



128 Dorrance Street, Suite 400
Providence, RI 02903
Phone: (401) 831-7171
Fax: (401) 831-7175
www.riaclu.org
info@riaclu.org

January 16, 2026

Members of the Middletown Town Council
Middletown Town Hall
350 E Main Road
Middletown, RI 02842

VIA EMAIL

Dear Town Councilors:

On behalf of the ACLU of Rhode Island, I want to thank you for the important points you raised at your last meeting, and the serious consideration you have given whether to install six Flock Safety surveillance cameras in your community.

As we have noted in prior communications with the Council, this technology is presently unregulated in the state. In that regard, I am writing to clarify a misconception expressed at the last meeting that no legislation has been introduced to regulate the use of these surveillance devices. In fact, there have been attempts at passing a state law to protect privacy and govern the procurement and use of these cameras, but they have been stymied by the strong opposition of law enforcement agencies. For reference, I have enclosed our testimony in support of [H-5659](#), a bill introduced last year on this subject. The bill was heard on March 25, 2025, but held for further study after facing opposition from multiple chiefs of police.

Preventing further installation of these systems is the best way to protect the privacy rights of everyone who resides in or visits Middletown. Vehicle surveillance cameras, such as the ones proposed, collect detailed location information on every driver who passes by, regardless of whether they are suspected of wrongdoing. These systems capture much more information than license plate numbers, raise significant privacy and civil liberties concerns, and enable broad data sharing with agencies outside of Rhode Island.

We truly appreciate your commitment to examining and considering these issues carefully, and we once again urge you to reject this proposal. If you have any questions, or if we can be of any assistance as you consider this request further, please let us know. Thank you again for your thoughtful attention to this important matter.

Sincerely,

A handwritten signature in black ink that reads "Madalyn McGunagle".

Madalyn McGunagle
Policy Associate

Enclosure

cc: Police Chief Jason Ryan, Chief of Police
Shawn J. Brown, Town Administrator
Peter Regan, Town Solicitor

ACLU OF RI POSITION: SUPPORT

**TESTIMONY ON 25-H 5659,
AN ACT RELATING TO CRIMINAL PROCEDURE –
AUTOMATED LICENSE PLATE READERS
March 25, 2025**

Over the past few years, the implementation of expansive “automated license plate readers” in municipalities across the state – in many instances without a public approval process or substantive public transparency – has marked a very troubling trend in the proliferation of surveillance tools by law enforcement. These cameras, owned and operated by a company called Flock Safety, have been rapidly expanding in use through municipal law enforcement departments and without any meaningful limitations on their usage or requirements for public oversight. We therefore strongly support this legislation, which would ensure that the implementation of these surveillance tools in Rhode Island cannot happen indiscriminately or without appropriate restrictions on their installation and use.

As typically occurs with surveillance technology, the actual capabilities of these cameras have been severely underplayed by police representatives. A joint news release issued by the police departments of Cranston, Woonsocket, and Pawtucket in August 2021 when they adopted this technology illustrates this issue clearly. The release reduced the abilities of the Flock Safety cameras to simply say that they “capture still photographs of license plates and vehicle characteristics as they travel on public roads.”¹ It is true that these cameras record and store both of these aspects, but the realities of the expansive abilities of this technology are far more alarming and troubling.

While the website no longer appears to contain this information, Flock Safety previously publicly advertised what these “vehicle characteristics” entail, explaining that its surveillance system allows police to search by “*vehicle type*, make, color, license plate state, missing/covered plates, and other unique features like *bumper stickers*, decals, and roof racks.” (emphasis added) We could find nothing currently on the Flock Safety website indicating that these types of data gathering techniques have been taken out of circulation.

Since every police department that is part of the Flock Safety system has access to the data collected by other participating agencies, the opportunity for targeted and widespread surveillance is multiplied. This is not a passive system that merely alerts police when a photographed license plate matches a vehicle in the NCIC system, for example. Police can input any license plate number

¹ <https://warwickpost.com/surprise-traffic-camera-surveillance-draws-criticism/>

or vehicle characteristic into the system and pull out any information about that vehicle's movements over a lengthy period of time in any community where the cameras are being used.

In addition, the capabilities of this technology go far beyond the exclusive capturing of visual data. Flock Safety's website again previously advertised the ability to search by "audio evidence" and "contextual evidence," which included "screeching tires" and "associated vehicles," implying that these systems capture audio in addition to video and utilize artificial intelligence to determine which vehicles in a certain area may be linked to one another. Though we were unable to continue to find promotion of these abilities on their website, it is a stretch to believe that a company like Flock Safety would *reduce* rather than *expand* the technological capabilities of its systems. Both of these uses, beyond the already invasive capabilities of the video capturing, signify a profound overreach of this technology and invite over-policing and misuse. In the absence of legislation as the scope of this technology expands, the privacy rights of Rhode Islanders will be solely at the mercy of police departments and a private company.

Further, separating the history of surveillance in the United States from racial discrimination is impossible because they are inextricably bound. Communities of color have disproportionately experienced the egregious effects of limitless surveillance, and this is not purely an historical lesson. In the last few years, First Amendment rights and racial discrimination have been entwined with the expanded use of surveillance tools. For example, municipal law departments were found to have used surveillance camera footage to inappropriately monitor activists during the Black Lives Matter protests of summer 2020.² In short, the abuse of surveillance technology is not hypothetical. Given the swath of current capabilities that Flock Safety has advertised – and the ones which it could add in the future – we are extremely concerned that this technology could facilitate similar police activity in Rhode Island.

It has been alleged by surveillance advocates time and time again that technology of this degree is necessary for public safety. We emphatically reject this claim. Community safety is not – and has never been – the result of a heavily and indiscriminately surveilled society. To posit Flock Safety as a needed component of safety diverts attention from the scope of this technology and its capacity to needlessly and harmfully encroach on the privacy of residents, and it particularly ignores the discriminatory manner in which surveillance technology has often been implemented. To represent the actual technology of these cameras as limited in scope is disingenuous and inappropriate given their extraordinarily invasive reach.

In short, this bill is a crucial piece of legislation which will ensure that our state maintains oversight over the technology and tools being used by our public-serving institutions. We cannot pay attention to the proliferation of surveillance technology only when it has become too late to stop or meaningfully regulate. We strongly urge passage of this legislation. It will allow police to use the cameras for the specific purpose that has been promoted, while prohibiting its more expansive and invasive use.

Thank you for your consideration.

² <https://www.npr.org/2021/08/20/1029625793/black-lives-matter-protesters-targeted>