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VIA EMAIL

Special Committee on Health, Opportunity, Prosperity, and Education
Providence City Council
25 Dorrance Street
Providence, RI 02903

Dear Councilors:

We write to thank you for your consideration tonight of Ordinance 54939 which would prohibit City-owned automated license plate readers (ALPRs) in Providence. We encourage the Committee to approve this ordinance for consideration by the full Council. Almost exactly one year ago, on November 7, 2025, the Council took steps to protect both our privacy rights and our immigrant community members by amending the City's Community-Police Relationship Act (CPRA) to set some restrictions on the use of these cameras. Instituting a ban on ALPRs is the next logical step flowing from those amendments, and key to prevent the misuse and abuse of these technologies that we have seen occur across the country.

Municipalities nationwide and in Rhode Island are increasingly terminating their Flock Safety ALPR contracts. For the Committee's reference, we have included a list of some of the municipalities nationally that have recently canceled Flock Safety contracts due to concerns like those outlined below. Locally, that list includes South Kingstown, Narragansett, Glocester, North Kingstown, Foster, and Cumberland. Providence can – and we believe should – further pave the way and become the first *city* in Rhode Island to ban these cameras.

We would also ask you to consider amending the proposed ordinance to address and eliminate the five ALPRs hosted by the City that are owned and operated by the Rhode Island State Police (RISP). Because we do not know where the RISP cameras are located in Providence, they could fall outside the bounds of this ordinance's protections. Recently, other municipalities have successfully requested the removal of RISP ALPRs from their communities, and we would encourage the Committee to explicitly do so as well through this ordinance.

Some of our more specific reasons for support of this ordinance are as follows:

• **The cameras capture more information than just license plate numbers**. ALPRs are often portrayed as law enforcement tools that merely capture photographs of license plates. However, this description understates, misrepresents, and minimizes the actual strength of these cameras, which can reveal a lot about a person. When combined, the data generated by these systems can reveal remarkably personal details about a person's life: where they worship, receive medical care, attend protests and political events, or even where they sleep. To sell their ALPRs,

Flock Safety touts their nationwide data sharing network, making this potentially sensitive information accessible to law enforcement across the country.

The system does not merely operate passively like other ALPR systems. Flock Safety users can search the system by inputting a wide variety of vehicle characteristics, including searches by vehicle type, make, color, and other unique features like roof racks and even bumper stickers. The police can obtain information about a vehicle's whereabouts, when captured by a camera, for the preceding 30 days by inputting any of these characteristics, and the vehicle's license plate, if they have it.[1] Notably, officers may input almost any reason when searching for a vehicle. We have seen numerous Flock Safety audits that merely include vague references to "investigations" as reasons to search the system.[2] Search results can include images not just from an ALPR located in Providence, but potentially from any municipality participating in the nationwide sharing network.[3] Even more alarming, despite continued – and false – reassurances by police that any privacy invasion is minimal because the cameras photograph only the backs of vehicles, a recent lawsuit in Rhode Island revealed the devices taking front-facing pictures of a vehicle's driver.[4]

Reports have also documented Customs and Border Protection searches of Flock databases and police conducting searches on behalf of Immigration and Customs Enforcement (ICE).[5] As mentioned prior, Providence amended the City's CPRA last year to prevent handing over information to ICE. However, the only surefire way to prevent misuse and abuse is by banning these cameras. The data sharing model is at the core of the system's problems. Other documented abuses include monitoring protests, tracking former romantic partners, and using the network to locate a woman suspected of having an abortion.[6] Due to the lack of rigorous auditing procedures in many police departments, most misuses of the system remain unknown.

• **In the absence of state laws limiting their use, the privacy rights of the public remain at the complete discretion of the police department and a private company, which can change their policies at any time.** Rhode Island currently has no law governing ALPRs, and the model policy resulting from the Governor's 60-day pause study period fails in a number of key respects to adequately protect the privacy rights implicated by the use of these systems.[7] There are

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[1] Flock Safety made operational changes that changed the default data retention time period from 30 days to 7 days. One state that has taken legislative action, New Hampshire, requires the information gathered from ALPRs to be deleted after three minutes. Flock's new changes also include an "evidence mode" which allows for ALPR users to retain significant portions of data for lengthy periods of time.

[2] https://data.aclum.org/2025/10/07/flock-gives-law-enforcement-all-over-the-country-access-to-your-location/

[3] For example, Woonsocket, RI shares camera data with dozens of municipalities including Houston, TX. See https://transparency.flocksafety.com/woonsocket-ri-pd

[4] https://www.golocalprov.com/news/ri-woman-sues-police-alleging-unlawful-arrest-following-inadequate-facebook-investigation

[5] https://www.404media.co/cbp-had-access-to-more-than-80-000-flock-ai-cameras-nationwide/; https://www.404media.co/ice-taps-into-nationwide-ai-enabled-camera-network-data-shows/

[6] See, e.g., https://www.eff.org/deeplinks/2025/11/how-cops-are-using-flock-safetys-alpr-network-surveil-protesters-and-activists; https://newbedfordlight.org/new-bedford-police-officer-accused-of-using-flock-cameras-to-track-and-follow-ex-romantic-partner/ ; https://www.404media.co/a-texas-cop-searched-license-plate-cameras-nationwide-for-a-woman-who-got-an-abortion/

[7] https://www.riaclu.org/news/aclu-of-rhode-island-statement-in-response-to-the-proposed-statewide-automated-license-plate-reader-policy/

additionally no constraints on the company's ability to change privacy protections at any time.[8] The recent statement from Flock Safety that the default timeframe for data retention will be 7 days instead of the current 30-day default only highlights the fact that nothing prevents law enforcement agencies or the company from deciding to extend data retention to 60 days, a year, or even a decade. The same is true for any other "safeguards" offered exclusively by police departmental policy or Flock Safety guidelines.

As an added layer of questionable transparency, we recently learned that Flock Safety has excluded all of their webpages – including transparency portal URLs that detail important information about municipal use of ALPRs – from appearing on the Internet Archive's Wayback Machine.[9] The Wayback Machine allows users to look at historical snapshot images of past versions of websites. This now means that no one can independently verify Flock Safety's past statements, guidelines, or promises. Instead, we are left relying on the continued contradictions the company makes.[10]

Additionally, we would like to call the Committee's attention to a recent *USA Today* article detailing how its investigation into Flock Safety system misuse led to numerous police employees in five states being arrested, fired, placed on leave, or under investigation.[11] The article's investigation relied on access to monthly use audits which detailed important information about law enforcement agency searches using Flock Safety, what data they are looking at, and the reason for the search. But in December 2025, Flock Safety changed the software for these logs to automatically redact officer identifiers, license plate numbers, and search reasons, making it much harder to flag misuse, since the public can no longer see the reasons for searches in logs dated after January 2026. As the *USA Today* article noted, the grave misuses of the system by police came from the newspaper's investigation, and not from internal audits by police departments.

• **It is almost inevitable that the use of these cameras will expand over time to engage in more – and more intrusive – types of surveillance**. The history of surveillance technology in this country has been a history of ever-growing uses, which are then used to justify and normalize even greater intrusions on privacy. Not only does this gradually erode our expectations of privacy, but it also normalizes these surveillance progressions. Even if not being used in more expansive ways today, the potential capabilities of an ALPR are not as narrow as simply identifying and cross-checking license plate numbers, and nothing prevents expanded uses in the future. The potential chilling effects on daily life by the ability to track individuals in this manner cannot be overstated.

Public safety is the result of community-based tools and systems that directly and tangibly support residents. It is not, and has never been, a result of indiscriminate 24/7 surveillance. We know that public safety objectives can be met without sacrificing basic privacy protections or

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[8] Legislation intended to regulate the use and procurement of these systems has been introduced in past legislative sessions and have been held for further study in committee after facing strong opposition from law enforcement agencies. See 2026-H 8077: https://webserver.rilegislature.gov/BillText/BillText26/HouseText26/H8077.pdf.

[9] https://ipvm.com/reports/flock-wayback

[10] https://www.aclu.org/news/privacy-technology/tracking-alpr-cameras/flock-safety-credibility-lost-as-it-repeatedly-lies-to-city-councils-police-departments-and-public-across-the-country

[11] https://www.usatoday.com/story/news/nation/2026/08/28/flock-camera-investigation-police-arrested-fired-surveillance/91383586007/

allowing unchecked surveillance.[12] Those that suggest that such surveillance technology is only a threat to those committing crimes are dismissive of the legitimate privacy concerns that all residents have. Ultimately, there should be no misunderstanding about the impact of Flock Safety technology: it constitutes the beginning of a nationwide surveillance network.

For all these reasons, we urge the Committee to pass this ordinance. As noted earlier, we also hope you will consider amending it to explicitly reject the continued placement of state police cameras in Providence. Thank you for your consideration of our views and we would be happy to explain these issues in more detail or answer any questions you may have.

Sincerely,

Madalyn McGunagle
Policy Associate

Enclosures

[12] We also wish to briefly address the narrative exploiting the tragic shooting at Brown University last year that has been used to justify the continued use of these technologies. The City's ALPRs did not prevent the horrific event from happening, nor did it prevent the culprit from killing another person two days late. Additionally, by the time the ALPR footage was able to locate the perpetrator, he had already been dead for two days. The Editorial Board of the Brown Daily Herald themselves called for termination of the City's contract with Flock Safety. See, https://www.browndailyherald.com/article/35faa89d-77b3-4538-a3cf-006b402ce99b

Cities That Have Ended Their Use of Flock (and other) ALPRs

State	Locality	Action	Date
Massachusetts	New Bedford	Banned ALPRs	10/22/26
Rhode Island	Cumberland	Cancelled Flock contract	10/7/26
Rhode Island	Foster	Cancelled Flock contract	9/10/26
Rhode Island	North Kingstown	Cancelled Flock contract	8/18/26
Massachusetts	New Bedford	Temporary suspension of system	8/11/26
Rhode Island	Glocester	Cancelled Flock contract	8/6/26
Rhode Island	Narragansett	Cancelled Flock contract	8/3/26
Rhode Island	South Kingstown	Cancelled Flock contract	7/27/26
Massachusetts	Salem	Cancelled Flock contract	7/23/26
Connecticut	Windsor	Cancelled Flock contract	7/15/26
Connecticut	Killingworth	Cancelled Flock contract	7/15/26
California	Los Angeles	Suspended Flock use to renegotiate stronger contract	7/11/26
Massachusetts	Framingham	Let Flock contract expire	6/25/26
Rhode Island	Little Compton	Indefinitely tabled Flock proposal	6/18/26
Maine	South Portland	Cancelled Flock contract	6/11/26
Ohio	Dayton	Indefinitely suspended Flock use	5/2/26
Wisconsin	Oshkosh	Cancelled Flock contract	4/23/26
Wisconsin	Dane County	Ended funding for Flock contract (effective termination)	4/19/26
Wisconsin	Sturgeon Bay	Did not renew Flock contract	4/15/26
Indiana	Bloomington	Cancelled Flock contract	4/15/26
New York	Tompkins County	Cancelled Flock contract	4/14/26
Massachusetts	Attleboro	Cancelled Flock contract	3/22/26
New York	Saranac Lake	Cancelled Flock contract	3/9/26
New York	Ithica	Cancelled Flock contract	3/8/26
Iowa	Coralville	Cancelled Flock contract	2/24/26
Colorado	Denver	Cancelled Flock contract; switched to Axon	2/23/26
Washington	Lynnwood	Cancelled Flock contract	2/23/26
Connecticut	Windsor	Temporarily paused Flock cameras	2/19/26
Arizona	South Tucson	Cancelled Flock contract	2/19/26
Missouri	Seneca	Cancelled Flock contract	2/19/26
National	n/a	Ring cancelled partnership with Flock	2/12/26
New York	Pine Plains	Nullified Flock contract	2/3/26

California	Mountain View	Discontinued use of Flock ALPRs	2/3/26
Washington	Prosser	Discontinued use of Flock	1/30/26
Massachusetts	Watertown	Canceled Flock contract	1/28/26
Rhode Island	Portsmouth	Rejected State Police Flock contract	1/28/26
California	Los Altos Hills	Removed all Flock ALPRs	1/27/26
New York	Syracuse	Removed all Flock cameras	1/26/26
Massachusetts	Greenfield	Removing all Flock cameras	1/22/26
Massachusetts	Natick	Terminated Flock pilot program	1/21/26
California	Santa Cruz	Cancelled Flock contract	1/13/26
Oregon	Bend	Turn off cameras and not renew contract	1/8/26
Washington	Walla Walla	Discontinued use of Flock	1/6/26
Virginia	Staunton	Canceled Flock contract	12/22/25
Arizona	Flagstaff	Canceled Flock contract	12/19/25
Virginia	Charlottesville	Discontinued use of Flock (at end of pilot program)	12/18/25
Texas	San Marcos	Declined to renew Flock contract	12/15/25
New York	Poestenkill	Rejected police request to install Flock ALPR	12/13/25
Colorado	Longmont	Declined to renew Flock contract	12/10/25
Massachusetts	Cambridge	Canceled Flock contract	12/10/25
Oregon	Lane County	Canceled Flock contract	12/10/25
Utah	Salt Lake City	Declined $224,000 DOJ grant to fund **Motorola/Vigilant** ALPRs	12/10/25
California	Richmond	Shut off Flock cameras	12/9/25
Rhode Island	Warren	Rejected State Police Flock contract	12/9/25
Oregon	Eugene	Cancelled Flock contract	12/5/25
Oregon	Springfield	Ended use of Flock cameras	12/5/25
Washington	Mountlake Terrace	Canceled Flock contract	12/4/25
Oregon	Woodburn	Suspend use of Flock (for at least 60 days)	11/13/25
Washington	Skamania County	Discontinued use of Flock	11/13/25
Wisconsin	Verona	Declined to renew Flock contract	11/11/25
North Carolina	Hillsborough	Canceled Flock contract	11/10/25
Texas	Hays County	Cancelled Flock contract	10/14/25
Arizona	Sedona	Canceled Flock contract	9/10/25
Illinois	Evanston	Cancelled Flock contract	8/26/25

Illinois	Oak Park	Canceled Flock contract	8/7/25
New York	Scarsdale	Canceled Flock contract	8/6/25
Texas	Austin	Cancelled Flock contract	6/6/25