

January 4, 2008

Rosemarie Kraeger
Superintendent of Schools
Middletown School Department
26 Oliphant Lane
Middletown, RI 02842

BY FAX AND MAIL

Dear Superintendent Kraeger:

An article in yesterday's *Providence Journal* describes how the Middletown School District is planning to implement a pilot program that, using Radio Frequency Identification (RFID) technology, will track the movements of Aquidneck Elementary School students who take school district buses. I am writing to express our organization's deep concerns about this program and to urge that this experiment be halted before it begins.

It is first important to emphasize the two very different components of this program, as described in the newspaper article. One is to use the RFID technology to track the movement of the school buses themselves. Based on the fact that your school district has apparently had only minor busing problems over the years, use of this potentially expensive technology seems rather unnecessary and an example of embracing new technology solely for technology's sake. However, the civil liberties implications of its use in this particular context are rather minimal and are not what prompt this letter.

Rather, our concern is with the totally separate decision to also attach RFID labels to the backpacks of the elementary school students taking these buses, so that the students themselves will be monitored. The only rationale offered in the news article for this significant intrusion is to allow school officials to know whether students boarded the right bus. We would certainly hope that this is a goal that school district procedures already address without the need to tag and track students like cattle. The use of RFID labels on the children is a solution in search of a problem.

Ironically, this intrusion on students' privacy could also have the effect of actually making the children less, rather than more, safe. That is because any information stored on an RFID chip that identifies a particular child, whether it be by name, address or school ID number, can potentially be read from a distance by inexpensive readers that can be easily purchased on the Internet. If school officials can find schoolchildren, others might also be able to find them and target them for improper purposes.

RFID technology was originally developed to track products and cattle. The privacy and security implications with using this technology for tagging human beings, particularly children, are considerable. Concerns about the use of RFID chips for non-commercial tracking purposes have been raised not only by organizations like the ACLU, but also by a variety of government organizations, elected representatives and independent researchers who specialize in RFID technology.*

* To cite just two examples: Noting that RFID tags "can be read by any compatible reader," the GAO wrote to Congress in 2005 that "the use of tags and databases raises important security considerations related to the confidentiality, integrity, and availability of the data in the tags, in the databases, and in how this information is

We do not know what assurances, if any, Mr. Collins has provided the school district about protecting the children's personal information and location information from unauthorized access, use and disclosure, but the results of detailed analyses of RFID technology by academic researchers, independent government agencies and the technology industry itself do not leave us sanguine about any such assurances.

Just as importantly, we believe that use of this technology on students, in addition to raising safety concerns, is objectionable for another fundamental reason. Requiring students to wear RFID labels treats them as objects, not children. The Middletown school district sends a very disturbing message to its young students when it monitors them using technology employed to track cattle, sheep and shipment pallets in warehouses. Further, encouraging the placement of RFIDs on young children, even in this limited and questionable context, can only have the unintended effect of acclimating them to being monitored by the government in other contexts and wherever they go, as if it were perfectly normal and appropriate. It is not, nor is it a notion that a school district should be encouraging, however unintentionally.

From a review of school committee minutes, it appears that this issue was the subject of discussion at one meeting, in November, with a presentation provided by Mr. Collins. Given the serious privacy and safety concerns raised by the implementation of this new program, the district's decision to go forward, based on what appears to be a relatively minimal examination of its implications, is quite troubling. We note that when a similar program was introduced a few years ago in a California school system in an even less intrusive manner – requiring students to wear RFID badges *while they were actually in school* – an outcry from parents led to its quick abandonment.

For these reasons, we urge school officials to respect the privacy and civil liberties of Middletown's elementary school students and reconsider this decision before the program is implemented on these children. For your information, by separate letter today, I am also filing an open records request to obtain more detailed information from the school district about this program.

Thank you in advance for your attention to these concerns, and I look forward to hearing back from you about it.

Sincerely,

Steven Brown
Executive Director

cc: School Committee Members
Michelle Fonseca
Maureen Cicchitelli

being protected.” *Radio Frequency Identification Technology in the Federal Government*, GAO, at <http://www.gao.gov/new.items/d05551.pdf>. The DHS Privacy and Integrity Committee in 2007 wrote that RFID-enabled systems had the potential to allow “widespread surveillance of individuals...without their knowledge or consent.” Report No. 2006-02: *The Use of RFID for Human Identity Verification*, DHS, at http://www.dhs.gov/xlibrary/assets/privacy/privacy_advcom_12-2006_rpt_RFID.pdf (p. 2).