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June 5, 2025

Barrington Town Council 283 County Road Barrington, RI 02806

Dear Members of the Barrington Town Council:

We understand that your upcoming special meeting on June 10, 2025 will focus specifically on the merits of installing ticketing speed cameras near schools. While we fully support efforts to make streets safer for pedestrians and bicyclists, we caution against the broader and unintended consequences of this particular approach. Specifically, we are concerned about the further expansion of camera surveillance into public spaces due to both its impact on privacy rights and the way that it encourages the privatization of law enforcement. As such, we respectfully request that you reject the installation of these cameras in the town.

Reliance on cameras and recording technologies to enforce traffic laws can, however unintentionally, easily escalate to a level of mass surveillance of motorists. While state law dictates some minimal school-zone speed camera enforcement privacy and data deletion practices, these systems can record and store an extensive amount of information about the movement of vehicles for months at a time.¹ With no legally binding standards in place, the data could be shared with third parties for a wide range of questionable purposes, similar to the ones noted below that have recently been reported in the media.

Traffic-related camera systems generally allow data to be aggregated and shared amongst other system users, allowing law enforcement to track vehicles (and, consequently, individuals) without a warrant. If the recorded data is combined with other surveillance cameras that read license plates, these systems can create a detailed and searchable database of an individual's travel. Even if a ticket is dismissed, images can be stored for months before being destroyed. And Rhode Island has no detailed laws in place to prevent the use of the captured images for other purposes.²

While the proposed Blue Line cameras' capabilities would not appear to be as robust as some other automated license plate reader (ALPR) systems like "Flock Safety," which is present in some Rhode Island municipalities, the potential for the use (or misuse) of these surveillance devices for other purposes simply cannot be discounted. A recently released report revealed that more than 4,000 national and statewide data lookup requests of Flock camera systems by local or

¹ R.I. Gen. Laws § 31-41.3-13.

² While § 31-41.3-13 refers, without further elaboration, to maintaining the privacy of records produced by the system, that language appears only to be aimed at the municipality, not the vendor.

state police were either done at the instruction of the federal government or with a particular focus on immigration.³

Further encroaching on privacy rights, traffic cameras and the data they generate can be used to track individuals and their movements. Another recent report revealed that in May, authorities in Texas searched over 83,000 traffic cameras nationwide to search for a woman they said had self-administered an abortion.⁴ This instance further illustrates how easily these systems can be used to surveil in disturbing ways — and ways that supporters of the cameras dismissed as fearmongering at the time of their implementation. While the proposed cameras for Barrington may seem relatively innocuous, the use of such surveillance systems promotes a culture that underestimates the potential adverse effects on privacy resulting from pervasive surveillance.

We are equally as concerned with the growing trend of privatizing law enforcement through arrangements with private vendors like Blue Line Solutions. According to a memo from the Barrington Police Chief to the Town Manager in early April, Blue Line Solutions engages in a vetting process and reviews every image captured through their "robust initial vetting system" before sending images to the police department. In that same memo, the chief explains that the vendor is additionally tasked with receiving all "not guilty" pleas, providing expert witness testimony, and scheduling all court hearings by coordinating with the Municipal Court. All of this internal collaboration is done while the company financially benefits from every ticket that leads to a fine. While perhaps not acting completely like "judge, jury, and executioner," the prominent role that Blue Line Solutions plays in the municipal process blurs the lines between the responsibilities of private entities and police in the enforcement of the law.

We again wish to emphasize that we share your commitment to protecting public safety. However, we believe that speed cameras can present significant privacy risks that outweigh their benefits. As others have noted, there are many alternative safety measures that are available, such as speed bumps, flashing signals, and better signage — none of which raise the privacy concerns that speed cameras do.

For all these reasons, the ACLU of Rhode Island urges the Council to explore those alternatives and reject this proposed measure to install speed cameras. Thank you for considering our views.

Sincerely,

Madalyn McGunagle

Madalyn McGunagle Policy Associate

cc: Philip Hervey, Town Manager Michael Correia, Chief of Police

³ https://www.404media.co/ice-taps-into-nationwide-ai-enabled-camera-network-data-shows/

⁴ https://www.eff.org/deeplinks/2025/05/she-got-abortion-so-texas-cop-used-83000-cameras-track-her-down; https://www.404media.co/a-texas-cop-searched-license-plate-cameras-nationwide-for-a-woman-who-got-an-abortion/