



*SENT VIA EMAIL TO AG@RIAG.RI.GOV*

Rhode Island Office of the Attorney General  
150 South Main Street  
Providence, RI 02903  
Attn: Attorney General Peter F. Neronha

August 7, 2025

**RE: Rules and Regulations for Operation of Body-Worn Cameras**

Dear Attorney General Neronha,

We are writing on behalf of Access/RI, a nonpartisan and nonprofit organization dedicated to improving access to government in Rhode Island. Our members include the ACLU of Rhode Island, the New England First Amendment Coalition, the League of Women Voters of Rhode Island, Common Cause Rhode Island and the Rhode Island Press Association.<sup>1</sup>

Access/RI sent testimony last September on the proposed Department of Public Safety amendments to the rules and regulations establishing a statewide policy for the use of body-worn cameras, or BWCs.<sup>2</sup> While we appreciate your office providing an explanatory statement responding to some of our concerns, we are disappointed to find many of them unaddressed.<sup>3</sup>

Transparency is critical within law enforcement agencies, especially when there is an officer-involved shooting. An unfortunate reminder is the June 8 shooting in Pawtucket that illustrates many of our concerns about the timely release of BWC footage and incident reports. As of August 5, only BWC footage of the aftermath of the shooting has been released and not of the shooting itself or the events leading up to the shooting. There also has not been released a written report by the officer involved. Worse, there appears to be a malfunction or deactivation of the involved officer's BWC resulting in an inexplicable gap in the video — and yet more questions about law enforcement action that day.<sup>4</sup>

In our Sept. 30, 2024, letter we stressed the importance that body-worn cameras provide for greater transparency and accountability in police work. While we understand the formal deadline for comments has passed, we are again raising our concerns and asking you to reconsider them. In particular, we would like to highlight the following:

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<sup>1</sup> More information about Access/RI and its members can be found at [www.accessri.org](http://www.accessri.org).

<sup>2</sup> See "Comments on Proposed Department of Public Safety Amendments to Rules and Regulations Establishing Statewide Policy for the Use and Operation of Body-Worn Cameras," Sept. 30, 2024 (<https://nefac.org/wp-content/uploads/2024/09/2024-BWC-regulations-testimony-0924.pdf>).

<sup>3</sup> See "Concise Explanatory Statement" ([http://nefac.org/wp-content/uploads/2025/08/CON\\_13211\\_20250515113550324.pdf](http://nefac.org/wp-content/uploads/2025/08/CON_13211_20250515113550324.pdf)) and "Rules and Regulations Establishing Statewide Policy for the Use and Operation of Body-Worn Cameras" ([http://nefac.org/wp-content/uploads/2025/08/REG\\_13211\\_20250516081535177.pdf](http://nefac.org/wp-content/uploads/2025/08/REG_13211_20250516081535177.pdf)).

<sup>4</sup> See "R.I. ACLU Questions 'Inexplicable' Gap in Police Officer's Body-Camera Video of Disabled Man's Shooting," Aug. 5, 2025 (<https://www.bostonglobe.com/2025/08/05/metro/aclu-questions-pawtucket-police-shooting>).

- BWC recordings must be included in written narratives at the end of each shift *where applicable*.<sup>5</sup> While the intention may be to broaden the scope of reports requiring BWC documentation, eliminating specified instances could lead to some departments inappropriately determining that notification is not applicable when filing reports that are currently mandated.
- For BWC recording inside law enforcement facilities with functioning camera systems, there is still no consideration given to the potential that surveillance systems may not provide the best perspective, can malfunction, do not provide audio recordings most of the time, or otherwise provide a less reliable recording of an interaction.<sup>6</sup>
- In BWC deactivation instances, clarification is necessary as the current policy is still confusing and over-broad, and appears to give extensive authority to officers to stop recordings in situations that do not warrant deactivation.<sup>7</sup>
- When weighing privacy needs with BWC footage, the current open-ended authority to discontinue recording should be narrowed, as the footage is still crucial to investigate an incident.<sup>8</sup>
- The rule dealing with public access to footage involving serious use of force incidents fails to adequately take into account the public's strong interest in gaining prompt access to footage in these situations.<sup>9</sup>

These are just a few of the main concerns we had with your proposed amendments. Others involve the required protocol after an officer's shift, the responsibilities of supervisors to document when a recording was interrupted and supervisors' monthly review of at least one recording.

Trust in law enforcement and the public's confidence in its work cannot be accomplished while keeping the public in the dark. We respectfully ask that you reconsider our concerns and revise the rules and regulations in the near future.

Thank you again for your consideration.

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<sup>5</sup> § 2.5.4 (B)(2)

<sup>6</sup> § 2.5.6(B)(2)(e)

<sup>7</sup> §§ 2.5.6(B)(3) and 2.5.10(A)(4)

<sup>8</sup> §§ 2.5.10(B) and 2.5.10(C)

<sup>9</sup> § 2.5.13(D)