

AUTOMATED LICENSE PLATE RECOGNITION SYSTEMS AT SAN DIEGO INTERNATIONAL AIRPORT – USAGE AND PRIVACY POLICY

SECURITY PROCEDURES AND PRACTICES

PURPOSE AND SCOPE

Public agencies using an automated license plate recognitions system (“ALPR system”) are required to comply with California Civil Code §§1798.25- 1798.29 and §§1798.90.5 – 1798.90.55. These Security Procedures and Practices (“ALPR Procedures”) outline the primary use and restrictions of ALPR systems at San Diego International Airport (“SAN”).

ALPR systems, also known as License Plate Recognition, provide automated imaging, digitization, recording and reporting of vehicle license plate numbers. ALPR systems have two distinct technologies: 1) Stationary systems using fixed cameras to collect and process digitized license plate numbers and 2) Mobile systems that rely on portable cameras to collect and process digitized license plate numbers.

The San Diego County Regional Airport Authority (“Authority” or “End User”) and its Parking Contractor (“Operator”) currently use a mobile ALPR system. A special camera, mounted on the Operator’s vehicle, systematically traverses the parking lots collecting license plate data. This process, performed each night, gathers and records parked vehicle license plate numbers.

These ALPR Procedures are consistent with Authority Policy 8.63 concerning privacy of personal information, which may be accessed at the following link:

http://www.san.org/Portals/0/Documents/Policies/SDCRAA_Policies_4-21-2016.pdf

AUTHORIZED PURPOSES FOR ACCESSING AND USING ALPR INFORMATION

The collection, use and retention of license plate numbers through the ALPR system by End User and Operator will be performed to:

1. Verify and document revenue control for lost or contested parking tickets;
2. Process vehicles parked in Authority Parking Lots exceeding 60 days to request vehicle identification/ownership from Harbor Police Department and issue an impending Intent to Tow Notice to the vehicle’s owner pursuant to California Vehicle Code § 22852;
3. Reconcile overnight parking inventories with the Parking Access and Revenue Control System;
4. Respond to Authority or law enforcement agency inquiries regarding stolen or suspicious vehicles; and
5. Identify a passenger’s vehicle location.

License plate information collected by the ALPR system will not be provided, sold and/or exchanged outside these provisions under any circumstances or conditions without the consent of the Authority’s Board of Directors or as required by law. License plate numbers will not be photographed, copied or in any way reproduced, except as authorized in this procedure.

ALPR OVERVIEW

The ALPR system at SAN collects license plate numbers using specially-designed mobile cameras affixed to a moving vehicle to accurately capture a vehicle's license plate number, convert the plate's alphanumeric characters into a digital image using optical character recognition technology and store the number in an electronic file. The ALPR Operator follows a prescribed route nightly to collect and process license plate images. The ALPR Operator confirms the digitized image is accurate before accepting it into the file, while performing the ALPR license plate collection. ALPR files are transmitted wirelessly to a central computer database (located in the SAN's Parking Management Office) where they are retained and accessed for approved use until deleted.

ALPR ADMINISTRATION

The Authority retains control and ownership of the license plate information collected from the ALPR system as the official custodian of its records. Requests for records containing information from the ALPR system under the California Public Records Act or other legal process outside the authorized uses described in this ALPR Procedure will be processed by the Authority. The Operator performs and manages all tasks associated with the ALPR operation including equipment specification, installation, operation and maintenance as well as the collection, control, archival and destruction of license plate number information. The Operator is responsible for ensuring only authorized persons (approved by the Authority) access, operate and/or maintain the ALPR equipment. The Authority further approves individual access and administrative rights to the ALPR applications. The Authority approves the procedures and practices for license plate number collection, storage, retention, archival and deletion.

ALPR USE RESTRICTIONS

ALPR use is restricted for the purposes described within these ALPR Procedures. ALPR Operator and End User personnel do not use or allow others to use the equipment or database records for any unauthorized purpose. The following restrictions apply:

1. License plate numbers collected with the ALPR system are for official and approved Authority business.
2. License plate numbers collected with the ALPR system may be used in conjunction with Authority-related investigations that require fact-finding or data collection.
3. Operator or End User personnel may not operate ALPR system equipment or access the license plate numbers without first completing training approved by the Authority's Ground Transportation Department.

ALPR LICENSE PLATE NUMBER COLLECTION AND RETENTION

Data and images of license plate numbers collected by the ALPR system are the property and possession of the Authority. License plate numbers collected by the ALPR system are for official use only by authorized Authority personnel, the authorized ALPR Operator or law enforcement agencies. License plate numbers collected by the ALPR system are retained and deleted according to the Authority's records retention policies for the Operator and End User.

ALPR SYSTEM QUALITY AND ACCURACY

The Authority will take reasonable measures to ensure the accuracy of license plate numbers collected by the Operator and other authorized personnel. The Operator and Authority correct mistaken translation and other database errors when identified.

The Authority acknowledges that, in rare instances, the ALPR system may inadvertently capture information contrary to the collection guidelines set forth in this policy. Such records will be purged upon identification.

AUTHORIZED USERS

Authority personnel authorized to obtain and use the ALPR system and/or to request ALPR system information from the Operator are:

1. The Vice President, Operations, as the Authority official and custodian accountable for all compliance with Authority Policy 8.63; and
2. The Director, Ground Transportation and the Manager, Ground Transportation as the Authority officials responsible for the Personal Information Implementation and Maintenance Procedures, the interface/liaison with law enforcement agencies, the interface/liaison with the ALPR Operator and the implementation of the Authority's ALPR procedures.

Law enforcement agencies (whether local, county, state or Federal) may also obtain information from the ALPR system through the Authority's Ground Transportation Department as part of a law enforcement investigation either in person (with identification) or through a written notice (agency letterhead). Except under exigent circumstances (as determined in the sole discretion of the Authority), two signatures from a law enforcement agency are required before information from the ALPR system is provided to law enforcement.

TRAINING

Training requirements for those with access to and use of the ALPR system are consistent with those defined in the Authority's Personal Information Policy Implementation and Maintenance Procedures. This training is conducted annually to review Authority Policy 8.63 and these ALPR Procedures. Records acknowledging completion of the training with the employee's signature will be maintained by the Authority. Access to the Authority's ALPR system is limited to persons who have successfully completed the training.

MONITORING AND COMPLIANCE

Procedural and technological measures will safeguard and protect information from the ALPR system at all times. These safeguards are followed to access and use information from the ALPR system:

1. All non-law enforcement requests to access stored information from the ALPR system will be referred to the Authority's Ground Transportation Director and processed in accordance with these ALPR Procedures.
2. All information from the ALPR system downloaded to the Operator's mobile workstation will be sent via a secure protocol to a server accessible only through a login/password-protected system and capable of documenting all access of information by name, date and time.

3. All information from the ALPR system is collected and retained by the Operator. The End User will verify the license plate information with the Operator prior to any action being taken.
4. Persons accessing information from the ALPR system will be permitted to use the information only for purposes authorized in these ALPR Procedures.
5. Information from the ALPR system may be released to verified law enforcement officials and agencies at any time for legitimate law enforcement purposes.

Annual ALPR system audits will be conducted to ensure compliance with these ALPR Procedures.