City of San Diego DEPARTMENT INSTRUCTION	DI Number 1	Sustainability Department
INTELLIGENT STREETLIGHT DATA POLICY	Page 3 of 3	Effective: 1/1/2019
Applies to all City staff; relates to businesses, organizations, and members of the public	Supersede DI N/A	Dated: 2/6/2019 (revision)

PURPOSE:

To provide clear direction to department personnel regarding the proper use, retention, storage, and dissemination of data collected by the cameras and sensors onboard City's intelligent streetlights.

SCOPE:

On December 13, 2016, the City of San Diego approved an agreement with General Electric (GE) to upgrade its infrastructure with intelligent streetlights from GE in approximately 9,000 of its 60,100 streetlights. The City's partnership with GE is expected to significantly reduce its energy consumption by adopting Adaptive Control LED lighting systems. Additionally, approximately 4,200 intelligent streetlight sensors will be installed at full deployment that will allow the City to transform this equipment into a connected digital network that can provide benefits and information such as optimized parking and traffic, enhanced public safety, and air quality information. The principal goal of the City in deploying intelligent streetlight sensors is to better understand the urban environment and to use these insights to provide better services to our residents.

HOST AND PARTICIPATING DEPARTMENTS:

Host Department: Sustainability

Participating Departments:

a. Police

b. All other departments that may use sensor data/metadata

DEFINITIONS:

API - An application programming interface (API) is a set of subroutine definitions, communication protocols, and tools which serve as a software intermediary that allows two applications to talk to each other.

API KEY - An application programming interface key (API key) is a code passed in by computer programs calling an application programming interface to identify the calling program, its developer, or its user to the Web site.

AUDIO – Real-time or recorded audio data.

DATA – Audio, video, and other information generated by CityIQ sensor nodes and subsequently retained onboard the streetlight, cloud services associated with the management of the streetlight, or retained by the City.

INTELLEGENT STREETLIGHT SENSORS – CityIQ sensor nodes, manufactured by General Electric, which have been installed on City streetlights to capture data and generate metadata.

JSON – JavaScript Object Notation or JSON is an open-standard file format that uses human-readable text to transmit data objects consisting of attribute value pairs and array data types or any other serializable value.

1

METADATA - Metadata is a description or definition of electronic data, or data about data. As referenced here, processed data generated by sensor nodes (static data on parking, vehicle counts, pedestrian counts, temperature, humidity, pressure). The nodes connect to technology partner GE's CityIQ cloud database to make the metadata collected by the sensors available. For example, metadata could include information regarding the number of persons who passed a location, during a particular time but would not include personally identifiable information about those persons. Often used interchangeably with data in this project.

VIDEO – Real-time or recorded video data.

OVERALL PROGRAM MANAGEMENT AND POLICY:

Access to data and metadata collected or generated by the sensors onboard City's intelligent streetlights shall be managed by the Sustainability Department's Director and their staff and/or City liaison appointee(s).

VIDEO/IMAGE RETENTION AND USAGE:

The video and related images from the cameras onboard the City's intelligent streetlight sensors may be accessed exclusively for law enforcement purposes with the Police Department as the custodian and departmental owner of these records. Only law enforcement personnel authorized by the Chief of Police and subject to Police Department policy shall have access to these recordings. The Chief of Police shall determine the manner in which video is retained and the duration of retention. The Sustainability Department and any and all other City staff will not have access to video/image data.

AUDIO RETENTION AND USAGE:

The audio from the City's intelligent streetlight sensors may be accessed exclusively for law enforcement purposes with the Police Department as the custodian and departmental owner of these records. Only law enforcement personnel authorized by the Chief of Police and subject to Police Department policy shall have access to these recordings. The Chief of Police shall determine the manner in which audio is retained and the duration of retention. The Sustainability Department and thus any and all other City staff will not have access to audio data.

PUBLIC ACCESS TO INTELEGENT STREETLIGHT SENSOR DATA:

Public access to or use of video, image, and audio data is not allowed and is subject to the Police Department's policy related to the use of video, images, and audio recordings for criminal investigations. Metadata and other data devoid of personally identifiable information and /or biometric information can be made available to the public with an open API key and log in credentials available via the City's website. The credentials will be changed regularly. The information is provided in JavaScript Object Notation (JSON) format. Members of the public may request access to an individual/custom application programming interface (API) key from the City with credentials that don't change regularly which they can use to access the data. In such cases the data requested, and the requestor, will comply with all other provisions of this policy and the Department may impose fees to recover its cost for creating, hosting, and

maintain the API. Access to the data by members of the public via an API may be authorized and/or discontinued at the discretion of the Department Director. The Department Director may create and administer a process for receiving, reviewing, and approving API key requests. Data requested and used by members of the public is to be used for purposes of beneficial research and/or civic innovation. Any user conducting unauthorized, negligent, or malicious use of data will be denied access immediately.
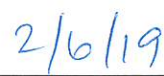
PROTECTING PRIVACY:

Information made available to the public will be anonymized data devoid of personally identifiable information and biometric information. To further safeguard privacy, intelligent streetlight sensors shall not be equipped with the following technology: Pan-Tilt-Zoom (PTZ) video magnification, facial recognition, and/or automatic license-plate readers (ALPR).

GENERAL SUPERVISION AND AUDIT:

The Department Director is responsible for conducting periodic reviews of the Department's use of intelligent streetlight sensor technology. The review should be conducted to ensure adherence to this policy and ensure the intelligent streetlight sensor program is providing value to the residents of the City as well as other operating departments.

Any individual requesting individual access to intelligent streetlight sensor data, metadata, and/or API access must review this policy and accept of the terms of use described here prior to receiving access.

As this is a new technology and an evolving field, the City of San Diego and the Sustainability Department may revise this policy at any time based on new information or best practices. This policy document is to be adhered to by all general City staff as of the latest date, regardless of ongoing review processes that may generate further revision.

Approval:

2/6/19

[Department Head/ Appointing Authority] Date