

June 9, 2020

Boston City Council

**Testimony in Support of
Ordinance Banning Facial Recognition Technology in Boston**

Dear City Councilors,

I am writing in support of the ordinance banning facial recognition technology in Boston presented by Councilors Wu and Arroyo. This ordinance establishes a ban on government use of face surveillance in the City of Boston. Boston must pass this ordinance to join Springfield, Somerville, Cambridge, Brookline, and Northampton in protecting racial justice, privacy, and freedom of speech.

As an early stage investor and venture capitalist focused on the data and tools to provide greater trust and transparency in the adoption of artificial intelligence and machine learning, I can testify that frequently artificial intelligence based applications are being put into production without a systematic process for assessing bias and fairness in the data training the models, methodologies for making the models more interpretable or understandable, or methodologies for monitoring and management in production throughout their lifecycle, creating regulatory and compliance risk where auditors do not have the information they need to investigate decisions recommended or automated by these applications.

Artificial intelligence and machine learning have a tremendous opportunity to surface new understandings and insights, but those advances will only be realized if we adopt these solutions thoughtfully, transparently, robustly, and accountably. Because automating decisions that have material impact on people's lives has the potential to unleash as great harm, particularly to those least able to respond and most left out of historic data, as it could benefit.

A pause on face surveillance technology is critically important in the City of Boston for three reasons:

- ...numerous studies have shown that this technology reinforces racial and gender bias. In fact, an MIT researcher, Joy Buolamwini, found that 1 in 3 Black women is likely to be misclassified by the technology.
- ... a federal government study published in December 2019 found that face recognition algorithms were much more likely to fail when attempting to identify the faces of people of color, children, the elderly, and women.

- ...face surveillance harms our privacy and freedom of speech. This type of surveillance threatens to create a world where people are watched and identified as they attend a protest, congregate at a place of worship, visit a medical provider, and go about our daily lives.

I encourage you to press pause on the use of face surveillance by government entities in the City of Boston by supporting and passing this crucial ban. We cannot allow Boston to adopt authoritarian, unregulated, biased surveillance technology.

Thank you for your attention and consideration.

Best regards,

Jennifer Jordan

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