



PUBLIC RECORDS
OFFICE OF THE RECORDS ACCESS OFFICER
Martin J. Walsh, Mayor

August 12, 2019

Kade Crockford
Director
Technology for Liberty Program
ACLU of Massachusetts
kcrockford@aclum.org

Re: [July 29, 2019 Public Records Request](#)

Dear Kade:

The City of Boston (City) has received your request for public records from the Office of Emergency Management (OEM). It is expected that a custodian of records must use her superior knowledge of her records with respect to responses to public records requests. 950 CMR 32.04(5). **To be clear, the City of Boston does not utilize any facial recognition services or software.** Records responsive to your request are provided [here](#) via a Google drive folder. Specifically, you stated:

LAN-TEL Communications, Inc. ("LAN-TEL") is a prominent vendor that provides security systems for municipalities all across the Commonwealth of Massachusetts. On May 12, 2019, LAN-TEL announced a partnership with AnyVision. The aim of this partnership is to give LAN-TEL's clients access to facial recognition technology by means of a "plug-and-play" solution update to its systems.

The ACLU seeks records relating to the [OEM's] relationship with LAN-TEL. These records relate to any plan for, acquisition of, and/or use of services and/or technology provided by LAN-TEL. This includes any service that might have been impacted by its partnership with AnyVision and the facial-recognition technology it provides.

Records requested

The ACLU requests all such records created on or after January 1, 2015, including but not limited to:

- 1. All communications between or among any representative of the COBOEM and any representative of LAN-TEL, including text messages and emails;*
- 2. All COBOEM communications referencing LAN-TEL or any of its products or services, including text messages and emails;*

Response: Records responsive to Requests 1 and 2 are provided [here](#). Please note the City redacted IP addresses pursuant to the second clause of exemption (c) of the public records law. G. L. c. 4, § 7 (26) (c). Such information could be used for identity theft or other criminal activity. The public interest does not outweigh the privacy

interest in this information. Exemption (n) of the public records law also permits withholding of information the disclosure of which would be a threat to public safety. G. L. c. 4, § 7 (26) (n). The redacted information could be useful to a terrorist wishing to commit harm upon the public. No other portion of these records were redacted and no records were withheld.

3. *Documents relating to the COBOEM purchase or use of LAN-TEL systems or technologies. This request includes but is not limited to: purchase orders, RFPs, licensing agreements, invoices, and contracts (including non-disclosure agreements);*

Response: Records responsive to Request 3 are provided [here](#).

4. *Materials relating to how LAN-TEL's services and products—including those provided in partnership with AnyVision for the provision of facial-recognition products or services—functions (or functions improperly), including e-mails, handouts, PowerPoint presentations, advertisements, or specification documents;*
5. *Training materials related to LAN-TEL's products or services, including if available AnyVision's facial-recognition products and services;*
6. *Records relating to any mobile application(s) related to LAN-TEL's products or services; and*

Response: There are no records responsive to Requests 4-6

7. *Records relating to any public process or debate about any LAN-TEL's products or services, including meeting agendas or minutes, public notices, analyses, or communications between the COBOEM and elected officials.*

Response: Records responsive to Request 7 are provided [here](#), including the Metro Boston Homeland Security Region (MBHSR) Charter and representative minutes for both the governing board and related subcommittee meetings. The Charter lays out the governing structure of the MBHSR and details the responsibilities of both bodies. Budget updates and project status updates - including updates on Lan-Tel projects - are part of each meeting. The selected samples relate to public process or debate - primarily funding and contracting discussions. Public meeting notices, which contain meeting agendas, can be found on the City Clerk's [website](#).

All responsive records are provided and all applicable fees waived. You may appeal this response to the Supervisor of Records in the Office of the Secretary of the Commonwealth. G. L. c. 66, § 10A (c); G. L. c. 66, § 10(b)(ix); 950 CMR 32.08; 950 CMR 32.08(1)(h) (in petitioning the Supervisor, the requester shall provide a copy of such petition to the records access officer associated with such petition). You may also appeal to the Superior Court. 950 CMR 32.06(3)(c).

Very truly yours,

A handwritten signature in blue ink that reads "Shawn Williams". The signature is written in a cursive style with a large initial 'S'.

Shawn A. Williams, Esq.
Director of Public Records