



**Office of City Solicitor**  
**City of Northampton**  
210 Main Street, Room 12  
Northampton, MA 01060

April 22, 2019

Please reply to:

Alan Seewald, Esq.  
City Solicitor

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**By Email Only**  
**kcrockford@aclum.org**

Kade Crockford  
Director  
Technology for Liberty Program  
ACLU of Massachusetts

RE: Public Records Request dated April 11, 2019

Dear Ms. Crockford:

I serve as Northampton City Solicitor. Please accept this letter as the response of the Northampton Police Department to the above-referenced public records request. You have requested the following documents:

1. Communications between any representative of the Northampton Police Department and any representative of any vendor offering any facial-recognition product or service.

**RESPONSE:** The Northampton Police Department has performed a search for the words "facial recognition," and found that there are 1,444 external emails with those words. Based upon the Department's experience with reviewing public records for redaction and dissemination, we expect the review to take approximately 25 hours, of which the first two hours are without charge. The lowest-paid qualified employee earns \$17.30 per hour. In addition, printing of the emails at \$.05 per page will cost \$72.20. In order to commence review of those emails, please forward a check payable to the City of Northampton in the amount \$470.10. Should the actual time to review the emails be more or less than estimated, the City will balance bill or issue a partial refund, as appropriate.

2. Internal communications between representatives or employees of the Northampton Police Department relating to any facial-recognition product or service.

**RESPONSE:** None

3. Documents relating to the Northampton Police Department purchasing or use of facial recognition, including but not limited to: purchase orders, RFPs, licensing agreements,

Department employees, invoices, and contracts (including non-disclosure agreements) related to any facial-recognition product or service.

**RESPONSE:** None.

4. Materials relating to how any facial-recognition product or service functions (or functions improperly), including e-mails, handouts, PowerPoint presentations, advertisements, or specification documents.

**RESPONSE:** None.

5. Manuals, policies, procedures, and practices governing the use or monitoring of a facial-recognition product or service or related information or databases. This request includes, but is not limited to:
  - a. Procedures for using, deleting, or retaining photos of subjects to be identified;
  - b. Materials identifying any sources of such photos, such as mobile devices, body cameras, surveillance videos, identification photos, or arrest photos;
  - c. Policies or procedures relating to the legal standard, if any, (e.g., probable cause, court order, relevance, consent) that is required before using any facial-recognition product or service.
  - d. Procedures the agency follows after a positive match, such as requiring independent or in-person verification;
  - e. Permitted uses of the information created from a positive match.

**RESPONSE:** None.

6. Training materials related to any facial-recognition product or service by employees of the Northampton Police Department.

**RESPONSE:** None.

7. Records relating to any mobile application related to any facial-recognition product or service.

**RESPONSE:** None.

8. Records relating to any public process or debate about any facial-recognition product or service, including meeting agendas or minutes, public notice, analyses, or communications between the Northampton Police Department and elected leaders or county officials.

**RESPONSE:** None.

9. Records relating to any Northampton Police Department employee use of the Face Match feature in the Coplink database system, including:
  - a. Any record pertaining to Face Match features.
  - b. Any record pertaining to how and when Northampton Police Department employees are permitted to perform Face Match searches.
  - c. Any record documenting the number of Face Match searches performed.
  - d. Any record pertaining to the notification of prosecutors and/or criminal defendants regarding the use of Face Match.

**RESPONSE:** None.

10. Records pertaining to the Coplink database, including:
  - a. Training materials.
  - b. Product documentation and/or marketing materials.
  - c. Policies, procedures, and memoranda of understanding or agreement.

**RESPONSE:** The Department has a Coplink manual that does not contain any materials regarding Face Match or other facial recognition features. Based upon the Department's experience with reviewing public records for redaction and dissemination, we expect the review to take approximately 2 hours. The lowest-paid qualified employee earns \$17.30 per hour. In order to commence review of that manual, please forward a check payable to the City of Northampton in the amount \$34.60. Should the actual time to review the emails be more or less than estimated, the City will balance bill or issue a partial refund, as appropriate.

Based upon the foregoing, it should be obvious that the Northampton Police Department does not use any facial recognition software. If you would like the Department to commence with its review of the external emails and Coplink manual, please forward a check or checks as set forth above.

Thank you for your attention to this matter.

Very truly yours,

Alan Seewald  
Northampton City Solicitor

AS/A

xc: Mayor David J. Narkewicz (by email only)  
Jody D. Kasper, Chief of Police (by email only)