Surveillance Impact Report

Application Based Commercial Transport (ABCT)
Airport

As required by San Francisco Administrative Code, Section 19B, departments must submit a Surveillance Impact Report for each surveillance technology to the Committee on Information Technology ("COIT") and the Board of Supervisors.

The Surveillance Impact Report details the benefits, costs, and potential impacts associated with the Department's use of Application Based Commercial Transport (ABCT) technology.

DESCRIPTION OF THE TECHNOLOGY

The Department's mission is the following:

We provide an exceptional airport in service to our communities.

In line with its mission, the Department uses Application Based Commercial Transport (ABCT) technology to receive data from Transportation Network Companies (TNCs) regarding their drivers' activity at the Airport, which the Airport uses to: (1) invoice TNCs for trip fees for passenger pickups and drop offs; (2) monitor and enforce TNCs' compliance with the conditions of their operating permits and the Airport Rules and Regulations (R&Rs); (3) support the issuance of citations for traffic violations issued by the SFPD Airport Bureau; and (4) for general transportation planning.

The Department shall use Application Based Commercial Transport (ABCT) technology only for the following authorized purposes:

Authorized Use(s):

- *Invoice TNCs for trip fees based on their passenger pick-ups and drop-offs at the Airport and perform invoice reconciliation.*
- *Monitor and enforce TNCs' compliance with the conditions of their operating permit and the R&Rs.*
- *Provide support for the issuance of citations for traffic violations by the SFPD Airport Bureau.*
- *Support Public Safety by ensuring only authorized and approved drivers and vehicles are allowed to service passengers at SFO.*

Prohibited use cases include any uses not stated in the Authorized Use Case section.

Further, processing of personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, gender, gender identity, disability status, or an individual person's sex life or sexual orientation, and the processing of genetic data and/or biometric data for the purpose of uniquely identifying an individual person shall be prohibited.

Airport technology may be deployed in the following locations, based on use case:

ABCT is located on the cloud of the third party platform that initially receives the data from the TNCs, Airport Research and Development Foundation (ARDF is a wholly owned subsidiary of AAAE).,and on premises at the Airport. The Airport's on-premises systems are comprised of a private cloud and on-premises hardware.

Technology Details
The following is a product description:

The ABCT app provides a real-time look into TNC traffic at an airport. This eliminates guessing how many rides happen daily or where the activity is occurring.

The ABCT service provides more than just reporting activity stats. The ABCT technology reconciles an airport's totals against the self-reported documents to ensure an airport is properly compensated for the amount of traffic and processes payments each month, helping make the process smoother for the many airport departments involved.

The ABCT mobile app gives airport curbside personnel the ability to check activity happening at the airport right from their phone or tablet.

Since each airport is unique with distinctive ground transportation challenges, the ABCT technology supports custom reporting features to fulfill each airport's unique need.

A. How It Works

To function, Application Based Commercial Transport (ABCT) works in the following way: The ABCT technology works by defining a perimeter, or "geofence," around the Airport using geographic coordinates. Using these coordinates, TNCs, which collect data about the activity of their on-duty drivers through the TNC app on the drivers' mobile device, parse out certain data regarding driver activity within the geofence. The TNCs send this data, along with the license plate number they have on record for the driver's vehicle, to a third-party platform, which in turn relays it to SFO in real time. The selected data is of the TNC driver's commercial activity, not personal driving activity, and includes no passenger information. Through the ABCT mobile app, SFO staff members, including SFPD officers assigned to the Airport Bureau, can monitor TNC drivers' activity for compliance with Airport Rules and Regulations and the conditions of the TNC's operating permit. Fines can be levied against TNCs for driver activities such exceeding curbside staging times, or for dropping off and picking up at non-designated areas. SFPD officers can also issue citations to the drivers based on violations of state and local law.

The third-party platform that originally receives the data from the TNCs, ARDF, uses it to invoice and collect trip fees from the TNCs on the Airport's behalf.

SFO keeps all the data for historical analysis.

All data collected or processed by Application Based Commercial Transport (ABCT) will be handled or stored by an outside provider or third-party vendor on an ongoing basis. Specifically, data will be

handled by ARDF (the vendor who licenses the technology) and Amazon Web Services to ensure the Department may continue to use the technology.

IMPACT ASSESSMENT

The impact assessment addresses the conditions for surveillance technology approval, as outlined by the Standards of Approval in San Francisco Administrative Code, Section 19B:

1. The benefits of the surveillance technology outweigh the costs.
2. The Department's Policy safeguards civil liberties and civil rights.
3. The uses and deployments of the surveillance technology are not based upon discriminatory or viewpoint-based factors and do not have a disparate impact on any community or Protected Class.

The Department's use of the surveillance technology is intended to support and benefit the residents of San Francisco while minimizing and mitigating all costs and potential civil rights and liberties impacts of residents.

A. Benefits

The Department's use of Application Based Commercial Transport (ABCT) has the following benefits for the residents of the City and County of San Francisco:

	Benefit	Description
☐	Education	
X	Community Development	Equitable distribution of and access to transportation.
☐	Health	
X	Environment	Traffic patterns and congestion within SFO.
☐	Criminal Justice	
X	Jobs	TNC companies and driver's; Ground Transportation Unit (GTU) resources.
☐	Housing	
X	Public Safety	Reduces risk of fraud and unethical business practices.
☐	Other:	Passenger Preference for this type of ground transportation.

B. Civil Rights Impacts and Safeguards

The Department has considered the potential impacts and has identified the technical, administrative, and physical protections as mitigating measures:

The San Francisco International Airport (SFO) strives to mitigate all potential civil rights impacts through responsible technology and associated data use policies and procedures, and intends to use aforementioned data exclusively for aforementioned authorized use cases. All other uses are expressly prohibited.

Specifically, SFO strives to support the civil liberties and freedoms of all persons and strictly prohibits the use of location data to identify or track individual users or customers of the City's Airport transportation system.

To set San Francisco residents' expectation of privacy and avoid resident loss of trust, public notice regarding SFO's receipt and use of data regarding TNC drivers' activity at the Airport is provided on the SFO Connect web-site (sfoconnect.com).

The SFO implements technical, physical, and administrative safeguards to mitigate potential misuse, abuse, or breach of collected data. Collected data is stored on a secure network in a restricted, password-protected system that can only be accessed by authorized personnel for authorized uses. Further, server rooms containing database systems are protected by physical access restrictions (i.e. badge access, locked door). The Department also follows data aggregation policies to ensure individuals' data is adequately protected.

To avoid discrimination and other potential civil rights impacts, data access is granted only to authorized users for authorized uses. Any Department personnel requesting access to the data must first submit a request to the Data Steward, specifically for the location data. The Data Steward obtains the user's requirements for data and its format for an authorized use. The Data Steward confirms end user authorization and signals technical staff to retrieve and send data to the requestor through a secure channel if necessary.

The administrative safeguards are the following: To protect the individual identities, travel preferences, and trip patterns and behaviors of individuals, any data released to the public through Sunshine requests or Public Records do not contain personal identifying information. Released datasets are limited to the requestor's specific request.

The technical safeguards are the following: Collected data is stored on a secure network in a restricted, password-protected system that can only be accessed by authorized personnel for authorized uses. The Department also follows data aggregation policies to ensure individuals' data is adequately protected.

The physical safeguards are the following: Specifically, server rooms containing database systems are protected by physical access restrictions (i.e. badge access, locked door).

C. Fiscal Analysis of Costs and Benefits

The Department's use of Application Based Commercial Transport (ABCT) yields the following business and operations benefits:

	Benefit	Description
X	Financial Savings	Not having to hire additional staff to manually monitor and manage the TNC's activities.
X	Time Savings	Staff can reconcile monthly invoices quickly with the use of aggregated data, saving dozens of hours per month of accounting time.·
	Staff Safety	
X	Data Quality	Human error is reduced; information is legible and can be easily sorted and summarized by computers; can be paired with analytical analysis; likely reduction in fraudulent handwritten records; increase in the number of records, since they are automatically created and sent.
X	Other: Enforcement of non-compliant drivers	Improved enforcement for non-compliance: drivers exceeding curbside staging times, drop-off and pick-ups at non-designated areas can be subject to fines and/or citations by the Airport (GTU and SFPD-AB), based upon the contracts with the TNC's.

The fiscal cost, such as initial purchase, personnel and other ongoing costs, include:

Number of FTE (new & existing)	*0.5 (IT staff maintaining API and data warehouse)*	
Classification	*Principal Information Systems Engineer (1044) / IS Project Director (1070)*	
	Annual Cost	***One-Time Cost***
Total Salary & Fringe	*$115,000 per*	
Software		
Hardware/Equipment	*$25,000*	
Professional Services		
Training		
Other		
Total Cost	***$140,000.00***	***None***

The Department funds its use and maintenance of the surveillance technology through operating funds and cost recovery through Permit Fees.

COMPARISON TO OTHER JURISDICTIONS

Application Based Commercial Transport (ABCT) technologies are currently utilized by other governmental entities for similar purposes.