

Personal Privacy Oversight Commission

November 8, 2023

Automated License Plate Readers

- License Plate Reader (LPR) Rule
- Current uses of LPR
 - Ports of entry
- Potential future uses of LPR
 - High occupancy toll lane
 - Cottonwood Canyon

- 2023 [S.B. 250](#) requires UDOT to issue a special use permit to a law enforcement agency before it uses an LPR system on a state highway
 - Prior to this change, UDOT did not allow LPR on state highways
 - [Proposed rule](#) has been submitted, public comment ends November 14
 - UDOT does not have oversight over an agency's use of LPR
 - UDOT will:
 - Verify that an agency has a LPR policy
 - Maintain permit information (agency, purpose, location, etc.)

Current Uses of LPR

- Ports of Entry
 - LPR data is used to identify motor carriers and their safety scores
 - Helps UDOT manage roadway safety and reduce delays for safe operators
- Process
 - UDOT uses license plate number and USDOT number to search federal safety database
 - UDOT reviews safety score
 - Potential inspection if safety score is low
 - No Personal Information of the driver only company information

Potential Future Uses of LPR

- High occupancy toll (HOT) lane
 - Current equipment is approaching end of life
 - Current contract ends 2027
 - Want to adopt the latest, most effective technology
 - Congestion is impacting HOT lane
 - Desire to decrease HOT lane violations
 - 2018 SB 71 allows UDOT to use LPR technology for tolling
 - Conducted LPR pilot January-April of this year
 - Side mounted LPR with optical character recognition
 - Captured 92% of plates
 - Next step: Select HOT lane replacement
 - Moving toward LPR as a solution
 - Only vendor would have access to PII for billing purposes
 - Once bill is paid, data could be deleted



Potential Future Uses of LPR

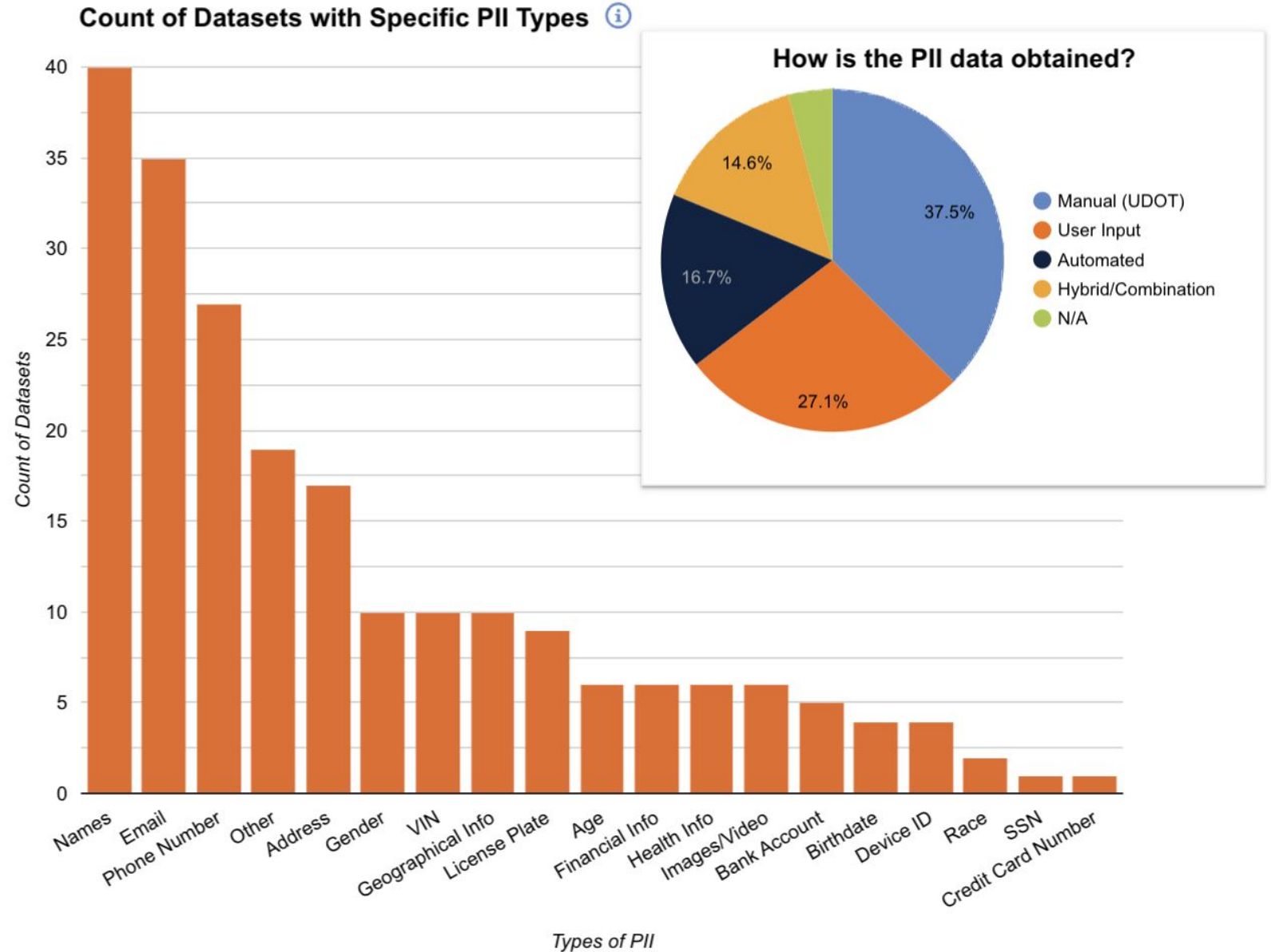
- Tolling in Big and Little Cottonwood Canyon
 - Tolling is part of Phase 1 of the Little Cottonwood Canyon Environment Impact Statement (need to do BCC EIS)
 - Target implementation is fall of 2025
 - Expect same implementation as HOT lane
 - Efficiencies if we have same back office for Canyons and HOT lanes tolling



Data Collection Activities - General Update

UDOT PII Dashboard

- UDOT PII Dashboard
- Public/Account Managers
- Contractors/Consultants
- Vendors/Suppliers
- Employees



PII Internal Audit Risk Evaluation (2021)

Date: June 2021	PII Information													
	PII1						PII2						PII Other 3	
	Name	Address	Phone #	Email Address	Driver License	License Plate	DOB	Gender	Race	Sex	HIPAA	Financial	SS #	Other
MC - MOTOR - CARRIER	Yes	Yes	Yes	Yes		Yes	Yes				Yes			
Certified Payroll - PDBS	Yes	Yes	Yes	Yes	No			Yes	Yes				Yes	Previous Name
PDBS (Project Development Business System) & Civil Rights	Yes	Yes	Yes	Yes	No			Yes	Yes				Yes	Previous Name
UTAPS - Crash Database	Yes	Yes				Yes	Yes				Yes			geographic coordinates.

Vendor Programs - Road Usage Charge & Express Lanes

Program enrollees provide the following to Commercial Account Managers:

- Name, email address, phone number
- Vehicle Identification Number (VIN) and License Plate Number (LPN)
- A valid credit or debit card for payment
- Address where the vehicle is registered
- Transponder ID, telematics access agreement, or OBD ID
- Express Lane- Clean Vehicle Pass

All data is collected and securely stored by Commercial Account Managers (Emovis, Etan) per Utah Code 63G-2-302(1)(s) (2022)

- Transponder (Date, Time, Tolling Plaza Location)
- RUC Device (Mileage, Location info, Vehicle performance statistics) per user agreement
- Financial payments and receivables
- Any data provided to DOT is aggregated and anonymized by CAM prior to delivery
- All data is destroyed at billing intervals (30-60 days) or as stipulated in personal registrant agreements

UDOT Major Systems with PII

Safety/Accident data - UTAPS

Permits - Access to do work within the ROW or state properties

Motor Carriers/POE: Prepass, Insection, CDL, Vehicle Reg, Oversize permits

Right of Way/Property Management - Purchases, acquisitions, leases, bidding

Procurement - Vendors, contractors, suppliers

Bidding System - Contracts, Invoices, Billing, Payments

TOC: ReadyOp, ATSPM, PEMS

Aircraft Registration

Employee Data

