



SCLC DC Global Policy Institute

April 9, 2020

The Honorable Muriel Bowser
Mayor of the District of Columbia
John A. Wilson Building
1350 Pennsylvania Ave, NW
Washington, DC 20004

Dear Mayor Bowser,

We at the Washington, D.C. bureau of the Southern Christian Leadership Conference (SCLC) are writing on behalf of our members, friends and neighbors who've expressed deep concern over a program being developed by the District Department of Transportation (DDOT). Notably, they've drawn our attention to DDOT's seeming disregard for the program's potentially harmful impact on equity, privacy, and safety in our most vulnerable neighborhoods. In the current cultural and political climate, the importance of protecting those three pillars of civil rights should be paramount. Thus, we will not hesitate to speak up when we observe the D.C. government stepping into territory that could curb those rights.

Like many others, we are troubled that DDOT's Mobility Data Specification (MDS) program could be used to track the movements of private citizens using dockless mobility devices, and eventually all ridesharing services. DDOT will soon require companies that operate these devices to adhere to MDS data sharing standards, which include providing the department with riders' precise GPS coordinates in real time. Although MDS doesn't collect rider names, numerous studies have shown that it's easy to identify someone based on their location. With very little analysis, MDS data can reveal a rider's home, work, place of worship, relationships, and more.

On its face, MDS is a clear violation of basic privacy standards, but more worrisome is the litany of troubles it could cause for minority and immigrant communities, among others. This includes equipping government agencies with a tool that could be used to surveil and racially profile our Black, Hispanic, and immigrant neighbors, and ultimately deter them from accessing affordable and convenient modes of transportation.

What will prevent Metro PD from accessing MDS and targeting Black neighborhoods for over-surveillance under the guise of crime prevention? Who will stop federal immigration authorities from getting a hold of MDS data to ramp up arrests and deportations among the District's undocumented population? And even if DDOT employees acted with the soundest moral code, there is no foolproof way to keep this data from falling into the hands of bad actors.

Furthermore, should MDS be developed to the extent its advocates have expressed hope for – real time tracking of ridesharing vehicles – how could minority and undocumented communities possibly feel safe using these services? The Center for Democracy and Technology has already written to DDOT expressing its concern that MDS could become “a barrier to entry for low-income and minority riders” and “deter underserved riders,” but the letter went unanswered.

Perhaps more troubling, DDOT has shown almost no transparency around its development of MDS or explained its motivations for implementing a program with such enormous red flags. The department has not held a single public hearing or meeting on MDS to seek input from residents and stakeholders, including civil rights groups like our own. It has not explained how such sensitive data will be handled, stored, shared, or secured. And it has not offered a single use case to demonstrate the need for tracking riders in real time. This is an inappropriate way to govern.



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We've seen far too many examples of technology created with the most benign intentions falling into the wrong hands or abused by those in power, and it's almost always our most vulnerable populations who pay the price. We strongly urge you to halt DDOT's development of this program and consider the threats it poses.

Sincerely,

Kevin B. Kimble, Esq.
Washington, D.C. Bureau Chief
Southern Christian Leadership Conference

CC:
Jeff Marootian, Director of the District Department of Transportation
The Honorable Karl Racine, Attorney General of the District of Columbia