



**INTERIM CDA**

InterIm Community  
Development Association

January 22nd, 2020

Dear Lawmakers,

On behalf of InterIm CDA— an organization dedicated to advancing social justice and equity for low income, Asian and Pacific Islander, immigrant, and refugee communities— we are writing to urge this Committee to oppose the 2020 WA Privacy Act (HB 2742 / SB 6281), and to instead support the Face Surveillance Moratorium bill HB 1654 / SB 5528.

Technology has too frequently been used as a tool of oppression, and we are concerned that the face surveillance aspects of the 2020 WA Privacy Act (SB 6281) could have negative impacts on our vulnerable communities. Face surveillance technology has not yet been adequately assessed to ensure that it's not biased, which is a critical step in determining whether this tool can be safely used on the public. In order to responsibly address the use of facial recognition tools in the state of WA, we urge you to oppose 2020 WA Privacy Act (HB 2742 / SB 6281) and support the Face Surveillance Moratorium bill HB 1654 / SB 5528.

History has repeatedly shown how technology can be used to unfairly target and surveil certain communities. Contemporary examples of the unjust use of technology can be found in examination of Japanese internment camps, the over policing of Black communities, and the warrantless tracking of Muslim individuals post-911. Proper governance of face surveillance technologies is a matter of protecting fundamental civil liberties.

Additionally, people in our communities are specifically vulnerable. Many of our communities have high numbers of immigrant people, who may live in mixed status families or who themselves might be undocumented. This technology puts their safety at risk by increasing the opportunity for a hostile federal agency to invade their privacy. Others in our communities are darker skinned, and these technologies have been shown to make more errors on people who have darker skin.

Beyond the problematic facial recognition components of the 2020 WA Privacy Act (HB 2742 / SB 6281), there are also vague phrases that undermine the ability of consumers to control their data. We urge the committee to carefully examine each aspect of this bill, which we have found to contain potential loopholes that tech companies could exploit.

We believe the 2020 WA Privacy Act does not create meaningful protections for the WA public, particularly people experiencing homelessness. We strongly urge this Committee to oppose the 2020 WA Privacy Act (HB 2742 / SB 6281), and to support Face Surveillance Moratorium (HB 1654 / SB 5528).

Signed,  
InterIm CDA