

City of Seattle

Revised Body Worn Video Redaction Cost Study Narrative

March 2018

Background

SPD has implemented a Body Worn Video (BWV) program. Currently more than 900 SPD officers are equipped with body cameras. They capture recordings that are public records subject to the Washington Public Records Act, Chapt. 42.56 RCW (PRA). The PRA allows a law enforcement agency to charge certain requestors the reasonable costs of redacting BWV videos prior to disclosure. Allowable redaction costs are in addition to copying costs that agencies are legally allowed to charge requestors. SPD conducted an initial body worn video redaction cost study in February 2017. SPD conducted this revised body worn cost study to incorporate SPD's experience with body worn video over the course of the past year. The purpose of this revised cost study is to determine those reasonable costs including determining reasonable estimated redaction charges to provide to requestors.

Introduction

With the exception of the following requestors, the PRA allows an agency to charge a requestor the reasonable costs of redacting, altering, distorting, pixelating, suppressing, or otherwise obscuring any portion of the body worn camera recording prior to disclosure:

- A person directly involved in an incident recorded by the requested body worn camera recording;
- An attorney representing a person directly involved in an incident recorded by the requested body worn camera recording;
- A person or his or her attorney who requests a body worn camera recording relevant to a criminal case involving that person;
- The executive director from either the Washington state commission on African-American affairs, Asian Pacific American affairs, or Hispanic affairs; or
- If relevant to a cause of action, an attorney who represents a person regarding a potential or existing civil cause of action involving the denial of civil rights under the federal or state Constitution, or a violation of a United States department of justice settlement.

An agency that charges redaction costs must use redaction technology that provides the least costly commercially available method of redacting body worn camera recordings, to the extent possible and reasonable.

EXHIBIT A

Principles

- We charge for redactions based on the parameters provided in the PRA
- We charge staff time directly applicable to redacting videos
- We charge staff time (salary only) for no more than the lowest-paid employee assigned responsibility for redacting video
- We have a highly-skilled Video Specialist who applies her expertise to redact video in an efficient and skillful manner
- We use redaction technology that most effectively and efficiently meets the administrative and operational needs of the Department
- We do not charge requestors any costs related to the redaction technology
- The City incurs substantial costs for video management, processing, storage, and redaction technology
- In addition to allowed redaction costs, we charge requestors the actual cost of copies of BWV recordings as provided in the PRA

Types of Redactions

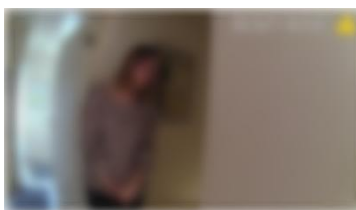
- Targeted Video Redaction of Person or Object with or without Targeted Audio Redaction: This blurs or blacks out the face or identifying features of an individual or object
- Targeted Audio Redaction Alone: This removes exempt portions of the audio without redaction of related video
- Screen Blur or Blackout: This blurs or blacks out the entire screen for a segment of video containing an exempt image, such as a Mobile Data Terminal (MDT) with exempt screen content, the interior of a place of residence where a person has a reasonable expectation of privacy, the interior of a medical or mental health facility, etc.
- The types of video redactions are illustrated in the next section

Video Redaction Type Illustrations

Targeted Video Redaction¹



Screen Blur²



Screen Blackout



¹ The size of the dot or shape obscuring an individual or object may vary to ensure that exempt identifying details are sufficiently obscured.

² Screen blur here is illustrated at 60% blur. The level of blurring may vary to ensure that exempt identifying details are sufficiently obscured

EXHIBIT A

Redaction Process

The cost of redacting video using current technology reflects actual staff time derived from the workflow necessary to apply redactions as detailed in the SPD Redaction Process Workflow, attached to this Cost Study.

Time Studies

Stopwatch style time studies were conducted to determine the amount of time it takes to redact BWV recordings including how long it takes to fully blur and remove audio from an entire video, eliminate one minute of video, redact one minute of simple audio, redact one minute of complex audio, redact one minute of simple video, and redact one minute of complex video.

Time Study Results:

Redaction Type	Actual Time	Redaction Time
Targeted Video Redaction with or without Targeted Audio Redaction	1 Minute per individual or object redacted	10 Minutes per individual or object redacted
Targeted Audio Redaction Alone	1 Minute	5 Minutes
Screen Blur or Screen Blackout	1 Minute per segment	1 Minute per segment

Video Specialist Salary

The salary for the Video Specialist in the SPD Public Disclosure Unit is approximately \$.60 per minute. This amount does not include benefits paid to the Video Specialist or other overhead costs. The PRA allows agencies to charge the actual cost of redacting BWV recordings including the cost of redaction technology provided it is the least costly commercially available method. The Video Specialist's salary amount does not include the cost of redaction technology and the City does not intend to charge requestors technology costs at this time. The City intends to charge requestors at the rate of \$.60 per minute of Video Specialist time to redact body worn videos. This rate is below the actual cost incurred by the City for redacting video.

Estimating Redaction Costs

Based on the results of the cost study, SPD Public Disclosure Unit staff will calculate estimated redaction costs at the following rates:

Redaction Method	Estimated Cost Per Minute to Redact	Minutes to Redact Per Minute of Raw Footage	Estimated Cost of Redaction Per Minute of Raw Footage
Targeted Video Redaction with or without Targeted Audio Redaction	\$.60 per individual or object redacted	10 per individual or object redacted	\$6.00 per individual or object redacted
Targeted Audio Redaction Alone	\$.60	5	\$3.00
Screen Blur or Screen Blackout	\$.60	1 Minute per segment	\$.60/segment

EXHIBIT A

SPD Will Charge Redaction Costs Based on Actual Redaction Time

The City will charge requestors redaction costs reflecting the actual time it takes to redact a particular video calculated at the rate of \$0.60 per minute.