



FOUNDATION

P.O. Box 32159
Newark, NJ 07102

Tel: 973-642-2086
Fax: 973-642-6523

info@aclu-nj.org
www.aclu-nj.org

JEANNE LOCICERO
Deputy Legal Director

973-854-1715
jlocicero@aclu-nj.org

VIA HAND DELIVERY

April 18, 2016

Custodian of Records
NJ TRANSIT
One Penn Plaza East, 9th Floor
Newark, NJ 07105-2246

Dear Records Custodian:

This is a request for records pursuant to the Open Public Records Act, N.J.S.A. 47:1A-1 et seq., and the common law right of access to public documents. *South Jersey Publishing Co. v. New Jersey Expressway Auth.*, 124 N.J. 478, 487-89 (1991).

Please provide me with the following government records for the period of July 1, 2014, to present (unless otherwise noted):

1. Invoices reflecting the purchase and installation of the audio recording systems in use on NJ Transit light rail systems;
2. If not contained in the records above, records documenting the name of the manufacturer(s) and model number of the audio recording system(s) utilized and/or owned by NJ Transit;
3. Records documenting the capabilities of the audio recording system utilized and/or owned by NJ Transit, including audio and visual recording technology, wireless communication networks, and recognition capabilities, including materials from the vendors describing the features of the systems;
4. Communications with the U.S. Department of Homeland Security regarding funding for recording systems (for light rail, heavy rail and buses), including grant applications;
5. Policies, procedures, guidelines, and other records documenting the procedures governing how and when information collected by the audio recording system is recorded, stored, indexed, accessed, and deleted, including documenting which employees or other persons are entitled to access to the recordings and what restrictions are placed on access; how long recordings are kept and how such recordings are deleted or destroyed; and what safeguards are taken to ensure no unauthorized persons gain access to the recordings;
6. Policies, procedures, guidelines, and other records documenting the data management of information collected by the audio recording system;

7. Reports, studies, or other evaluations discerning the effectiveness of audio recording on mitigating crime;
8. Reports, studies, or other evaluations discerning the effectiveness of audio recording systems deployed on public transportation;
9. Reports, studies, or other evaluations utilized in determining which NJ Transit lines to equip with audio recording systems;
10. Memoranda, directives, and/or bulletins to NJ Transit employees regarding the audio and video recording systems;
11. Records that reflect the number of distinct recordings made between April 1 and April 10, 2016.
12. Records that reflects the number of hours recorded between April 1 and April 10, 2016.
13. All audio recordings made on the Newark Light Rail from 7 a.m. to 9 a.m. on April 1, 2016;
14. All audio recordings made on the River Line Light Rail from 7 a.m. to 9 a.m. on April 8, 2016; and
15. All audio recordings made on the Hudson-Bergen Light Rail from 7 a.m. to 9 a.m. on April 13, 2016.

If you determine that any portion of the requested materials is exempt from release, we request that you redact the portion that you believe exempt and provide us with copies of the remaining, non-exempt portions. If any or part of this request is denied, please send us a letter describing each item being withheld or each partial redaction and listing the exemption(s) on which you rely for each such item or redaction.

If you feel that unusual circumstances warrant a special charge for providing the particular items in this request, please advise me beforehand so that we can discuss arrangements.

If you feel that any of the requests are unclear, vague, or overbroad, please contact me for additional information.

Thank you in advance for your attention to the matter.

Sincerely,

A handwritten signature in cursive script that reads "Jeanne LoCicero".

Jeanne LoCicero
Deputy Legal Director