

United States Senate

March 3, 2021

Mr. Jeffrey Bezos
Chief Executive Officer
Amazon.com, Inc.
410 Terry Avenue N.
Seattle, WA 98109

Dear Mr. Bezos:

We write regarding the recent announcement that Amazon has equipped its delivery vehicles with surveillance cameras to monitor its drivers.¹ Although community and automobile safety are of the utmost importance, they must not come at the expense of workers and the public's safety, privacy, and wellbeing. We are concerned that adding further surveillance tools and monitoring could increase dangers on America's roads, place unsafe pressure on drivers, and infringe on individuals' privacy rights.

Amazon has partnered with the start-up Netradyne to deploy its "Driveri" cameras on Amazon's vehicles. These cameras reportedly have four lenses that simultaneously record the vehicle's interior, the road ahead of it, and a view from both sides of it. As drivers and people go about their daily lives, these cameras will likely capture an enormous amount of video footage without their knowledge or permission. Turning Amazon's increasingly prevalent delivery vehicles into roaming video recording devices could dramatically decrease Americans' ability to work, move, and assemble in public without being surveilled.

Your company's use of surveillance cameras in Amazon's vehicles could also threaten the safety and wellbeing of your delivery service providers. According to reports, the Driveri cameras that Amazon has installed in its vehicles constantly record video when drivers are on their delivery routes, and software sends the footage to a portal if artificial intelligence systems detect that a driver is not displaying safe behavior.²

While we applaud efforts to improve safety on the roads and decrease the plague of distracted driving, we need a better understanding of how your company will protect against potential new safety hazards stemming from increased worker surveillance.³ Although Amazon may intend for its use of Driveri cameras to improve safety on the road, this surveillance could, in practice, create significant pressure on drivers to speed up on their routes, which can lead to driver fatigue and decreased safety.⁴ Amazon's business model prioritizes quick delivery to your customers,

¹ Nick Statt, *Amazon plans to install always-on surveillance cameras in its delivery vehicles*, The Verge, (Feb. 3, 2021), <https://www.theverge.com/2021/2/3/22265031/amazon-netradyne-driveri-surveillance-cameras-delivery-monitor-packages>.

² Annie Palmer, *Amazon is using AI-equipped cameras in delivery vans and some drivers are concerned about privacy*, CNBC (Feb. 3, 2021), <https://www.cnbc.com/2021/02/03/amazon-using-ai-equipped-cameras-in-delivery-vans.html>.

³ *Id.*

⁴ Karen Levy, *To fight trucker fatigue, focus on economics, not electronics*, The Los Angeles Times, (July 15, 2014), <https://www.latimes.com/opinion/op-ed/la-oe-levy-trucker-fatigue-20140716-story.html>

and reports have demonstrated how Amazon's existing tracking systems may pressure drivers to prioritize speed over safety.⁵ By deploying Driveri cameras in its trucks, Amazon risks exacerbating this problem.

Finally, Amazon appears to be implementing a worker surveillance infrastructure that infringes on your workers' privacy.⁶ Evidence suggests that artificial intelligence systems designed to analyze faces may be plagued with systematic inaccuracy issues that place disproportionate burdens on women and individuals of color.⁷ Amazon needs to explain how it will address these concerns.

We therefore request written answers to the following questions by March 24, 2021.

1. According to reports, Amazon has installed Driveri cameras in only a percentage of its delivery vehicles thus far.⁸
 - a. How many delivery vehicles are currently equipped with Driveri cameras? What percentage of Amazon delivery vehicles have this technology installed now?
2. Does Amazon intend to install Driveri cameras in all its delivery vehicles? Please describe in detail any plans that Amazon has for increased deployment of Driveri cameras.
3. Does Amazon intend to install this technology on Amazon's fleet of third-party contracted delivery vehicles?
4. How does Amazon plan to use the recordings and monitoring information from Driveri? How will that information be used to evaluate or score a driver's performance or safety record, including assessments about performance goals?
5. Will the monitoring from Driveri be used to determine driver remuneration, promotion, allocation of hours or tasks, or termination?
6. What training will Amazon provide to managers or drivers regarding what information Driveri and other monitoring services collect and how they use that information?
7. Does Amazon own the video that Driveri cameras on Amazon's vehicles capture? If not, who owns this footage?

⁵ Patricia Callahan, *The deadly race: How Amazon hooked America on fast delivery while avoiding responsibility for crashes*, ProPublica, (Sept. 19, 2019), <https://features.propublica.org/amazon-delivery-crashes/how-amazon-hooked-america-on-fast-delivery-while-avoiding-responsibility-for-crashes/>.

⁶ Annie Palmer, *Amazon uses an app called Mentor to track and discipline delivery drivers*, CNBC (Feb. 12, 2021), <https://www.cnbc.com/2021/02/12/amazon-mentor-app-tracks-and-disciplines-delivery-drivers.html>.

⁷ Patrick Grother et al., *Face Recognition Vendor Test (FRVT) Part 3: Demographic Effects*, National Institute of Standards and Technology Interagency or Internal Report 8280 (2019).

⁸ Annie Palmer, *Amazon is using AI-equipped cameras in delivery vans and some drivers are concerned about privacy*, CNBC (Feb. 3, 2021), <https://www.cnbc.com/2021/02/03/amazon-using-ai-equipped-cameras-in-delivery-vans.html>.

8. Amazon’s Privacy Policy for Vehicle Camera Technology states that Amazon can “share the information derived from the Technology” with “Third-party service providers” as well as “Amazon group affiliates.” It also states that “[u]nder appropriate circumstances the information may be provided to law enforcement.”⁹
 - a. Please identify any third parties with which Amazon has shared or plans to share Driveri footage and describe in detail these data sharing arrangements.
 - b. Please describe in detail the circumstances under which Amazon has or would share Driveri footage with law enforcement entities, including whether Amazon voluntarily complies with law enforcement requests or requires a subpoena or other compulsory process.
9. Please describe in detail the security protocol that Amazon uses to protect Driveri camera footage. Does this protocol employ encryption techniques?
10. Does Amazon upload this footage to a portal or server? If so, please describe in detail the process by which the Driveri camera footage is uploaded to the server where Amazon stores this data.
11. How long does Amazon—and any other entity with access to Driveri camera footage—maintain this data?
12. Please describe in detail Amazon’s process for reviewing Driveri camera footage.
 - a. Does Amazon rely on automated systems, human oversight, or a combination of the two for its review of Driveri camera footage?
13. Please describe in detail the policies Amazon has in place to ensure that the Driveri cameras Amazon deploys do not capture footage of members of the public or private vehicles without their knowledge or permission.
 - a. Is license plate data purposefully captured by these cameras?
14. Do the Driveri cameras on Amazon’s vehicles employ facial recognition technology, such as Amazon’s Rekognition technology, or other biometric recognition technology? If not, will you commit that you will not integrate any biometric recognition technologies into the cameras on Amazon’s vehicles? If not, why not?
15. Can any driver of Amazon’s vehicles opt-out of being recorded by Driveri cameras?
 - a. If so, can you commit that Amazon will not terminate or otherwise retaliate against drivers who opt-out of this monitoring system? If not, why not?

Promoting safety on our roads is of paramount importance. However, the surveillance system you have begun to deploy in your vehicle fleet raises important privacy and worker oversight questions that Amazon must answer. Thank you for your attention to this important matter.

⁹ Amazon - Privacy Policy for Vehicle Camera Technology
<https://amzl-dsp-bgc-docs.s3.amazonaws.com/DSP+Privacy+Policy+for+Vehicle+Camera+Technology.pdf> (Last visited Feb. 4, 2021).

Due to the telework policies of many Senate offices during the coronavirus pandemic, physical signatures are unavailable. The listed senators have asked to be signatories to this letter. If you have any questions, please contact our offices.

Sincerely,

Edward J. Markey
United States Senator

Richard Blumenthal
United States Senator

Bernard Sanders
United States Senator

Cory Booker
United States Senator

Elizabeth Warren
United States Senator