September 26, 2019

The Honorable Edward Markey
United States Senate
255 Dirksen Senate Office Building
Washington, DC 20510

Dear Senator Markey,

Thank you for your letter dated September 5, 2019 regarding Ring. Ring’s mission is to make neighborhoods safer. We feel strongly that when communities work together, safer neighborhoods become a reality, which is why we created the Neighbors app. The Neighbors app provides a safe forum for community members to easily communicate about crime and safety in their neighborhood. The Neighbors app is free and may be used by every community member regardless of whether they own a Ring device. We continue to see examples of the Neighbors app helping to create safer neighborhoods, including getting stolen guns off of the streets, helping families keep their children safe, and recovering stolen medical supplies.

The Neighbors Portal is an extension of the Neighbors app that allows local law enforcement to post information about crime and safety alerts; view and comment on public posts as an identified law enforcement officer; and use the video request tool to ask Ring to request video footage from Ring device owners who are in areas of an active investigation. With the Neighbors Portal, law enforcement can only view publicly available content in the Neighbors app, unless a user explicitly and voluntarily chooses to share their own recordings with law enforcement.

Ring customers place their trust in us to help protect their homes and communities and we take that responsibility seriously. We will continue to prioritize privacy, security, and user control as we pursue and improve technologies to help achieve our mission of making neighborhoods safer.

The answers to your specific questions are as follows:

1. How long has Ring prompted its users to share video footage with law enforcement entities? Please provide a detailed timeline of when this sharing began and how, if at all, Ring has changed its policies surrounding this sharing over time.

Ring only asks users to share video footage when specifically requested by law enforcement through the video request tool in Neighbors Portal. The video request tool – launched in April 2018 – allows law enforcement to ask Ring to request video footage from Ring device owners who are in areas of an active investigation.

Law enforcement cannot communicate with or request videos from users directly using the video request tool. Users are in no way required to share footage when requested. With each request, users decide whether to share any of their videos, and no videos or other user information is ever shared unless a user takes affirmative action. Users who choose not to share their recordings or opt out of
future video requests remain anonymous to law enforcement as they do not know the identity of users who received a request or opted out.

We continue to review ways to improve how law enforcement interacts with the communities they serve through this new feature, while maintaining privacy, security, and user control.

2. Please provide a list of all law enforcement entities – including local police departments and federal agencies – that have had or currently have access to video footage from Ring products. Please provide a copy of a standard video-footage sharing agreement between Ring and a local police department.

Ring is transparent about which local law enforcement entities are enrolled in the Neighbors Portal. Ring’s Active Law Enforcement Map¹ includes a list of local police departments that use the Neighbors Portal. State and federal agencies do not currently have access to the Neighbors Portal. Ring updates the map regularly so users can search either by zip code, address, or visually by zooming into a region or city. As of September 26, 2019, Ring’s most recent update to the map occurred on September 20, 2019.

Ring enters into agreements with law enforcement to provide access to the Neighbors Portal, the current version of which is enclosed herein. Ring customers choose whether to consent to sharing video footage with law enforcement. As noted above, the Neighbors Portal is designed to ensure that users maintain privacy and control over their data, and that law enforcement does not have access to user information or videos without a user’s explicit consent.

We are continually evaluating and refining our process for onboarding entities onto the Neighbors Portal to ensure that customers understand how law enforcement uses this tool, which includes strong mechanisms to maintain their privacy and security.

3. Does Ring require police department partners to delete users’ footage after a certain amount of time? If not, why not?

Ring does not require law enforcement to delete materials shared through a video request after a certain period of time. Law enforcement departments may be subject to local record keeping laws that require them to retain investigative materials for a defined period of time. Law enforcement may also need to retain the videos for a longer period of time to complete ongoing investigations or while a case is pending.

4. Does Ring require police department partners to institute security safeguards to ensure that the Ring footage to which they have access is not breached or otherwise accessed by unauthorized entities? If so, please describe these security requirements. If not, why not?

Each law enforcement agency has its own requirements, protocols, and security measures for materials stored in its files. Ring does not impose requirements beyond law enforcement’s own procedures.

¹https://bit.ly/2msXQOr
5. Does Ring prohibit police departments with access to users’ footage from sharing that footage with other entities? If not, why not? Is Ring aware of any instances in which police departments have shared users’ footage with third parties? If so, please describe in detail all such instances.

Ring only permits the requesting law enforcement officer and agency administrator the ability to view video footage that Ring users explicitly agree to share. If videos are downloaded by law enforcement, Ring does not require police departments to agree to additional restrictions, as the videos may become public records subject to certain record keeping and transparency requirements. For example, if the videos are used in an investigation that leads to criminal charges or a trial, the videos could become public records.

In addition, it is standard practice for law enforcement agencies to collaborate on investigations. Ring would not receive a notification each time a law enforcement agency shared information to solve a crime. Ring is constantly seeking ways to maximize transparency and user control, including adding additional information on how video footage may be used when a customer consents.

6. Will Ring commit to reviewing its consent prompts for video-footage sharing in consultation with experts and making any necessary revision to ensure that Ring does not use manipulative or coercive language with its users?

Ring’s customers are our top priority. Ring strives to effectively communicate customers’ choice to share videos. Ring uses clear language to ensure that customers understand that they are in complete control of their data and do not feel pressure to share video footage with law enforcement.

With each video request, users decide whether to share any of their videos, take no action (decline), or opt-out of all future requests. Law enforcement agencies have no visibility into which users have received a request and which have opted out or declined. Ring constantly reviews its processes and welcomes feedback from all groups to improve services to ensure that users understand their control over their data.

We are always looking for ways to improve our processes and communication to customers, including work with external experts to increase transparency and maintain customer trust.

7. What steps has Ring taken to ensure that its internet-connected doorbells and its social network, Neighbors, do not contribute to racial profiling by law enforcement or Ring users?

Ring requires all Neighbors app users to agree to community guidelines, which strictly prohibit racial profiling, hate speech, and other forms of discrimination, prior to posting on the app. Ring strives to promptly remove all content that violates the guidelines. We invest heavily in manual and automated content moderation. A dedicated group of Ring team members proactively moderate content before it is posted to the Neighbors app 24 hours a day, seven days a week to ensure all posts are in accordance with the community guidelines. Ring users also have the power to flag incorrect or inappropriate content directly in the Neighbors app. The moderation team reviews flagged posts and, if the content violates one of our community guidelines, it will be removed from the content feed. When we deny posts as part of our pre-moderation process, we send an email to the Neighbors user who submitted the post to let them know why. By educating our users on why their post did not make it to their feed, we reinforce our guidelines and help our users make responsible decisions.

We also reserve the right to terminate a customer’s use or access to Ring’s products or services when we determine a customer has violated our Ring Neighbors Community Guidelines.

Ring will continue to seek input to improve services, earn trust, and ensure all members of the community feel safe.

8. Has Ring consulted with experts in civil liberties, criminal justice, and other relevant fields to conduct a review of its internet-connected doorbells and its social network Neighbors, to ensure that these offerings do not present unique threats to people of color or other populations? If not, why not? If yes, please share the list of consulted parties.

Yes, Ring is currently engaged in private discussions with criminal justice and academic groups to explore ways to foster a safe and interactive space for all members of the community. Due to ongoing discussions, including our future product roadmap, Ring is keeping these conversations confidential in order to maintain a productive dialogue.

9. Please describe in detail Ring’s plans to add facial recognition capabilities to its products, including any potential timeline.

Ring does not currently offer facial recognition technology as part of its services. We are constantly innovating on behalf of our customers, and privacy, security, and user control will always be paramount when Ring considers applying any technology to its business.

10. Please describe any plans to coordinate law enforcement’s use of Amazon’s Rekognition product with forthcoming facial recognition offerings from Ring.

Ring and the Neighbors app are not affiliated with Amazon’s Rekognition and Ring has no plans to coordinate with law enforcement regarding their use of Rekognition or other facial recognition offerings.

Thank you for your interest in Ring and the important issues of security and customer trust.

Sincerely,

Brian Huseman
Vice President, Public Policy
Neighbors by Ring
Access Agreement

This agreement provides [agency] (“Agency”) access to the Neighbors Portal for the purpose of engaging [city/county] Neighbors app users subject to the following terms and conditions:

Ring
- Will make the Neighbors app available to community residents free of charge.
- Will make the Neighbors Portal available to Agency free of charge.

Agency
- Will maintain appropriate user access control to Neighbors Portal for Agency personnel, including ensuring credentials are not shared beyond the Agency’s law enforcement personnel and ensuring that terminated personnel will not have access to the Neighbors Portal.
- Will use Neighbors Portal only for legitimate law enforcement purposes.

Public Announcement
Neither party may use the other party’s name, logo, or likeness in any advertising or press release without prior written approval of the other party. Notwithstanding the foregoing, Ring shall be permitted to provide in-app announcements to Ring Neighbors announcing Agency’s participation in the Neighbors app.

Cost and Compensation
There is no cost associated with this agreement nor any endorsement or promotional requirements. At no point shall either party receive compensation from each other as a result of this program.

Ring Standard Terms
Ring’s Terms of Service, Privacy Notice, and the Ring Neighbors’ Community Guidelines as posted on Ring.com, shall apply to all uses of the Neighbors App and, as applicable, the Neighbors Portal.

Notification
You will promptly notify Ring if you become aware that you or your Agency’s personnel have violated any of the foregoing terms.

RING LLC
By: ________________________________
Name: ____________________________
Title: _____________________________
Date: _____________________________

[AGENCY]
By: ________________________________
Name: ____________________________
Title: _____________________________
Date: _____________________________