amazon

July 1, 2022

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

Dear Senator Markey,

Thank you for your June 14, 2022 letter. Ring customers place their trust in us to help protect their homes and communities and we take that responsibility seriously.

Ring doorbells have always had audio capabilities, which help customers better understand what is happening on their property. Whether at home or away, our customers rely on the microphone and speaker in our doorbells to hear who is at their door and engage in two-way communication with delivery drivers, visitors, and others. As with the hundreds of millions of smartphones, video cameras, and other devices that have similar audio capabilities, our customers expect this functionality and appreciate the ability to review recordings they miss. For example, it is not uncommon for a delivery driver to leave a recording that a package has been delivered or provide instructions for where it can be located. We also provide customers with the ability to disable a device's audio features with an easy toggle found in the privacy settings of the Ring app.

For customers who subscribe to a Ring Protect plan, recordings are stored securely in the customer's Ring account in accordance with our standard retention and deletion policies, unless the customer selects a shorter custom retention period or manually deletes their recordings at any time. For customers who do not have a subscription plan, no audio or video is recorded or stored by Ring.

As you know, the Policing Project at New York University (NYU) School of Law recently completed an extensive audit of Ring to help Ring improve its products and services from a civil liberties and policing ethics perspective, with a focus on Neighbors Public Safety Service (NPSS). From the outset, Ring committed to the findings of this audit being made public, and the Policing Project maintained control over the report's content and findings.

Ring implemented more than 100 changes to our products, policies, and legal practices during the two years the audit was carried out. This included introducing Requests for Assistance, which helps ensure transparency in how public safety agencies can ask their communities for information or video as part of an active investigation. We intentionally designed Requests for Assistance to keep control in the hands of Neighbors users, not the requesting agencies. Contrary to reports by media and third-party organizations, NYU's independent audit found that Request for Assistance posts do not facilitate "the kind of continuous, bulk, and directly accessible surveillance that concerns us most;" in fact, most requests were for video related to relatively serious crimes like "vehicle burglaries and robberies,

shootings, home burglaries and robberies, and stolen vehicles." NYU's audit did not establish that Requests for Assistance contribute to over-policing of low-level offenses. Furthermore, NYU's audit concluded that changes made by Ring "facilitate democratic governance" and "make it easier for the public (including advocacy organizations) to hold their agencies accountable."[1]

NYU's audit also recommended a number of policy proposals to regulate how law enforcement agencies access and use videos from private individuals. We support and stand ready to work with policymakers to act on those recommendations.

We are proud of the changes we have made, both prior to and in response to NYU's audit. 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. **To the best of Ring's knowledge, how far away can Ring products capture audio?**

   Audio capture depends on many conditions, including device placement and environmental conditions. While our customers expect audio capabilities, they also have the ability to disable a device's audio features with an easy toggle found in the privacy settings of the Ring app.

2. **Will Ring commit to eliminating Ring doorbells' default setting of automatically recording audio when video is recorded? If no, why not?**

   Our customers expect and appreciate audio functionality—as they do with other devices that capture video, like their smartphones. Setting the default setting to not capture audio would be a negative experience for customers and might, for example, prevent a customer who never visited the settings from hearing audio in an emergency situation.

3. **Will Ring commit to never incorporating voice recognition technology into its products? If no, why not?**

   Ring does not currently offer voice recognition.

4. **Will Ring commit to making end-to-end encryption of stored recordings the default option for users, so that Ring and Amazon do not have access to user videos? If no, why not?**

[1] "Ring Neighbors and Neighbors Public Safety Service: A Civil Rights and Civil Liberties Audit," The Policing Project (NYU School of Law), accessed June 24, 2022, https://www.policingproject.org/ring, 27-33.

Ring was the first major security camera provider to offer customers End-to-End Encryption. With video End-to-End Encryption, customers can view their encrypted videos only on their enrolled mobile devices. This means some features will be disabled when customers choose to enable End-to-End Encryption. User control is foundational at Ring, and we recognize this advanced feature may not be right for all customers. We are committed to giving customers options so they can choose the Ring experience that is right for them.

5. **Ring has committed to "try to onboard" non-law enforcement agencies onto the NPSS platform in order to combat over-policing. Please detail how many of each of the following entities use NPSS:**
   a. **Police departments**
   b. **Fire departments**
   c. **Public health agencies**
   d. **Animal services**
   e. **Agencies that primarily address homelessness, drug addiction, or mental health**
   f. **Others (please specify)**

Neighbors is designed to connect users with trusted sources of information related to safety in their communities. That commitment pre-dates our work to improve our products and services with the Policing Project. For instance, since 2019, the National Center for Missing and Exploited Children and Ring have partnered to provide missing child posters on Neighbors and to prompt users to contact the proper authorities. Neighbors provides information and links to resources for mental health, including the National Alliance on Mental Illness Helpline and the National Suicide Prevention Hotline. Neighbors also provides resources and best practices for reporting and searching for lost pets; lost pets continue to generate more than a quarter of all content on Neighbors. Neighbors Public Safety Service currently has 2,161 law enforcement agencies and 455 fire departments enrolled. Ring continues to explore onboarding additional resources to Neighbors, and we will only do so with a thoughtful approach that protects customer privacy and promotes customer control.

6. **Some police departments have reportedly circumvented Ring's official processes to access users' recordings. What steps has Ring taken to ensure that police departments do not bypass Ring requirements by engaging directly with device users outside of NPSS?**

Ring introduced Request for Assistance posts on Neighbors to promote transparency in how public safety agencies ask their communities for information or video as part of an active investigation. We intentionally designed these Requests for Assistance to keep control in the hands of our customers, not the requesting agencies. Ring does not participate in camera registry programs managed by police departments, including programs that provide direct access to user devices, and we encourage agencies to utilize the Request for Assistance feature.

7. **Ring has stated that it will not share "customer information" with law enforcement absent consent, a warrant, or "an exigent or emergency" circumstance.**

    a. **Please explain in detail Ring's specific internal policies regarding what constitutes an "exigent or emergency" circumstance.**

As stated in Ring's law enforcement guidelines, Ring reserves the right to respond immediately to urgent law enforcement requests for information in cases involving imminent danger of death or serious physical injury to any person.[2] Emergency disclosure requests must be accompanied by a completed emergency request form.[3] Based on the information provided in the emergency request form and the circumstances described by the officer, Ring makes a good-faith determination whether the request meets the well-known standard, grounded in federal law, that there is imminent danger of death or serious physical injury to any person requiring disclosure of information without delay.

    b. **How many times has Ring shared a user's recordings with law enforcement because of an "exigent or emergency" circumstance?**

So far this year, Ring has provided videos to law enforcement in response to an emergency request only 11 times. In each instance, Ring made a good-faith determination that there was an imminent danger of death or serious physical injury to a person requiring disclosure of information without delay.

8. **Under the NPSS Terms of Service, Ring reserves the right to permanently ban a user or agency for conduct that is "inappropriate or harmful." Please explain in detail Ring's specific internal policies regarding what constitutes such "inappropriate or harmful" behavior, including what behavior would lead to suspension and what behavior would lead to a permanent ban.**

All posts and comments to Neighbors, including by NPSS users, are subject to moderation before they are published to ensure compliance with our community guidelines.[4] If a post or comment violates our guidelines, it will not be published. Neighbors reserves the right to remove any content that we determine violates our guidelines, and reserves the right to take other action, such as temporarily suspending or permanently banning accounts, at any time for any conduct that we determine to be inappropriate or harmful. In addition to Ring's work with the Policing Project, Ring recently completed a thorough review of our content moderation practices and guidelines with the

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[2] For Ring's full law enforcement guidelines, please see https://support.ring.com/hc/en-us/articles/360001318523-Ring-Law-Enforcement-Guidelines

[3] For Ring's emergency law enforcement request form, please see https://support.ring.com/hc/en-us/article_attachments/360081269691/Ring_Emergency_Law_Enforcement_Request_Form.pdf

[4] For Ring's full community guidelines, please see https://support.ring.com/hc/en-us/articles/115004851266-Neighbors-by-Ring-Community-Guidelines

Center for Democracy and Technology to ensure posts on Neighbors do not amplify inappropriate behavior.

9. **Does Ring work to proactively ensure that users or agencies on NPSS abide by the NPSS Terms of Service? In particular, does Ring proactively review activity on NPSS to stop users from engaging in "inappropriate or harmful" conduct, "post[ing] deliberately false or misleading information," and using anything other than their "real name, title, and agency contact information"? If yes, please explain how. If no, will Ring commit to developing such a process?**

See response above.

10. **Ring has "placed a moratorium" on onboarding private policing agencies onto NPSS.**
    a. **Please identify all the private agencies currently on NPSS.**

All agencies are subject to the same NPSS policies, including posting requirements and guidelines. All agencies on NPSS have a public profile, so customers and the public can see which agencies use NPSS, and easily review all posts and requests for information made by agencies.

    b. **Will Ring commit to extending this "moratorium" into an indefinite ban on all private policing agencies from NPSS? If no, why not?**

Ring does not allow private security companies on NPSS. Following NYU's audit, it is our policy to onboard private agencies only if they are peace officers under state law and subject to constitutional restrictions.

11. **Ring has made updates to address concerns about privacy, bias, and over-policing. Will Ring commit to making the changes identified below permanent? If no, why not?**
    a. **Never accept financial contributions from policing agencies;**
    b. **Never provide contributions of financial value, including device donations and event invitations, to policing agencies;**
    c. **Never allow immigration enforcement agencies to request Ring recordings;**
    d. **Never allow federal law enforcement agencies to request Ring recordings;**
    e. **Never allow Ring employees to bring incidents posted on the Neighbors App, the Ring social network platform, to law enforcement attention or encourage the same;**
    f. **Never participate in police sting operations;**
    g. **Always uphold all other commitments enumerated in part IV of the Policing Project report.**

Ring participated in an exhaustive review of these issues as a part of NYU's audit, and Ring stands by the commitments we have made both prior to and during the audit.

Ring is continually improving our products and services to enhance customer control, and we remain committed to protecting customer privacy and security. Thank you for your attention to this important topic.

Sincerely,

Brian Huseman
Vice President, Public Policy