



August 6, 2019

The Honorable Jena Griswold
Colorado Secretary of State
1700 Broadway, Suite 200
Denver, CO 80290

Secretary Griswold:

During the negotiations of HB 19-1278, the Secretary of State's office agreed to review the video surveillance rules as they pertain to drop boxes. While we appreciate the proposed change in Rule 7.5.1(e), we would still like to see amendments to current Rule 1.1.45, too.

The current definition basically asks us to continuously record, which is antiquated, and we end up taking pictures of empty space. These pictures lead to larger file sizes and comes with a slightly higher risk of hardware degradation due to constant writing. Because we almost continuously record, we must lower both the frame rate and the resolution, which makes the images look choppy and blurry. Additionally, we would have to spend large amounts of time sifting through images of empty space if we wanted to find an event.

Instead, Denver has systems that can begin continuous recording once it detects motion, including buffer times on each end of the motion. As soon as motion is detected, the system goes back a set amount of time and gives context to the recording and can keep recording. This system would let us compress the files for better storage. It's also our understanding that most motion systems continuously record as a buffer in case of a failure, but the system simply overwrites this buffering much faster if it doesn't need to be kept (no motion was detected). This leads to smaller file sizes for more manageable storage. Additionally, both the hardware and software have undergone massive amounts of testing to assure the system will not fail.

Another issue is that we try to share already-existing infrastructure in the City so that we do not have to install new, yet ironically antiquated, video technology.

Therefore, Denver would like to see the definition of "video security surveillance recording" change to something along the lines of ". . . means video monitoring by a device that continuously records a designated location or a system that uses motion detection to trigger continuous recording."

Thank you.