



12/5/2017

Mike Ceynowa
City of Duluth Police Department
2030 North Arlington Avenue
Duluth, MN 55811

Re: Automated License Plate Reader Audit

Dear Mr. Ceynowa,

This letter is to address an error in the original Automated License Plate Reader Audit letter dated 5/31/2017. The original letter reflected a 90-day retention period in error. The City of Duluth Police Department retains their ALPR data for 60 days in accordance with the retention requirements of the 2016 Minnesota Law Chapter 13.824. This correction is reflected below.

FRSecure LLC was retained by the City of Duluth Police Department to conduct an audit of their Automated License Plate Reader (ALPR) system. The purpose of the audit was to evaluate the security controls and operational processes used to manage the ALPR and validate that these controls and operational process are in compliance with the 2016 Minnesota Law Chapter 13.824.

These efforts were led by a professional security practitioner that has over 30 years' experience performing audits and risk assessments.

The analysis was conducted using the 2016 Minnesota Law Chapter 13.824 and determined that the City of Duluth Police Department is operating their system in accordance with this law. Specially:

1. Logs are maintained that reflect the operations of the ALPR. The required data and audit information is being logged and archived.
2. Data is being classified appropriately. There has been no request to re-classify the data for disclosure or extended retention.
3. The ALPR data is only being used to assist the officers on their patrols. No request for disclosure have been received.
4. ALPR data is retained for 60 days, there have been no request to retain ALPR data beyond the 60 days.
5. Access permissions are appropriate. An access sample was performed to verify appropriate access permissions are granted to the users.

Based on the above, we hereby attest to the fact that the City of Duluth Police Department has taken and currently maintains reasonable and appropriate security measures and has established effective operating procedures for proper security and management of the ALPR system in accordance with the 2016 Minnesota Law Chapter 13.824.

Sincerely,

John Harmon
VP of Operations
FRSEcure, LLC



FRSECURE

INFORMATION SECURITY EXPERTS