

Communication from Public

Name: Casey Maddren/Citizens for a Better Los Angeles
Date Submitted: 05/01/2025 08:52 AM
Council File No: 22-1154-S1
Comments for Public Posting: Citizens for a Better Los Angeles submits the attached comments on the proposed digital kiosk program.



Citizens for a Better Los Angeles

May 1, 2025

Los Angeles City Council
Los Angeles City Hall
200 N. Spring St.
Los Angeles, CA 90012

Sent via e-mail to council offices.

Posted to council files 22-1154 and 22-1154-S1.

Re: IKE Smart City Interactive Kiosks, Council File: 22-1154
Interactive Kiosks Request for Proposal, Council File: 22-1154-S1
OPPOSED

Members of the Los Angeles City Council,

Citizens for a Better Los Angeles (CBLA) is a nonprofit public benefit corporation organized to protect the rights and promote the well-being of all people throughout Los Angeles County. We're writing because we have serious concerns about the proposed interactive kiosk program, and especially the possibility that IKE Smart Cities could be chosen as the vendor for this program. While we have many concerns about the program in general, a review of IKE Smart Cities' privacy policy raises a number of red flags with regard to the collection and sharing of personal information. To briefly summarize our concerns:

- IKE Smart Cities' privacy policy acknowledges that the company collects personal information, including IP addresses, device names, phone numbers, email addresses and biometric information;
- IKE Smart Cities' privacy policy appears to indicate that it collects the above categories of information from minors;
- While IKE claims that it does not sell personal information, its privacy policy acknowledges that this information is or can be disclosed to its third-party partners, its parents, subsidiaries and affiliates, and/or any entity who acquires, by any means, some or all of the assets or ownership interests of

- IKE Smart City;
- As the LAPD rolls out its Real Time Crime Center Program, collecting video footage in public locations, we have serious concerns that any digital kiosk program will be used for surveillance of the general public;
- Any new street kiosk program which collects revenue through advertising will be directly competing with the already approved STAP program, for which the City is paying over \$300 million in capital expenditure costs, and will hamper the STAP contractor's ability to repay the City;
- Installing hundreds of digital kiosks in the public right-of-way is an invasion of our rapidly shrinking public space.

Following is a more detailed explanation of our objections to this program in general and to the IKE kiosks specifically.

IKE Kiosk Privacy Concerns

While few people who interact with IKE kiosks will likely take the time to read it, IKE Smart Cities' privacy policy acknowledges that the company collects personal information, including IP addresses, device names, phone numbers, e-mail addresses and biometric information.

IKE Smart Cities Privacy Policy

<https://www.ikesmartcity.com/documents/en/privacy-policy.html>

While IKE claims that it does not sell personal information, its privacy policy acknowledges that this information is or can be disclosed to its third-party partners, its parents, subsidiaries and affiliates, and/or any entity who acquires, by any means, some or all of the assets or ownership interests of IKE Smart City.

What's even more disturbing, the language of the policy seems to indicate that IKE knowingly collects data from minors over the age of 13:

[....] nor do we knowingly or intentionally collect personal information from children under the age of 13. If you are under the age of 13, you are not permitted to submit any personally identifiable information to us. We adhere to the Children's Online Privacy Protection Act in our operation of the Kiosks.

We are deeply concerned that the installation of hundreds of IKE kiosks on LA's streets will lead to the widespread collection and dissemination of personal information with no oversight and no accountability.

Concerns about LAPD Surveillance

As the LAPD rolls out its Real Time Crime Center Program, collecting video

footage from cameras in public locations, we have serious concerns that any digital kiosk program will be used for surveillance of the general public. The general public should not be subjected to warrantless surveillance by law enforcement.

Rollout of Kiosks Will Likely Reduce Revenue from STAP Program

Any new street kiosk program which collects revenue through advertising will be directly competing with the already approved STAP program, for which the City is paying over \$300 million in capital expenditure costs, and will hamper the STAP contractor's ability to repay the City. The City has made a huge financial investment in STAP, and because of its precarious financial state, it can't afford to undermine profits from STAP that would reimburse the City for funds already spent.

Further Invasion of Public Space

The STAP program promises the installation of hundreds of digital ad panels on LA's bus shelters. Metro's TNC program involves the installation of dozens of massive digital billboards within city boundaries. The City of LA does little to enforce existing laws against illegal billboards. Digital kiosks will be one more invasion of public space, which seems to belong less and less to the public. There has been no comprehensive environmental assessment of impacts. Public agencies that are supposed to be representing our interests instead seem to be selling public space to the highest bidder.

While we focus on the IKEA kiosks in this letter, the same privacy concerns would probably arise with any other commercial kiosk program. They all involve collecting personal data from the public and "sharing" that data with their "partners". Aside from general concerns about massive, unregulated collection of data, we are very concerned about law enforcement using video feeds to expand warrantless surveillance.

We ask the members of the LA City Council to reject the digital kiosk program. Thank you for your time.

Sincerely,
Casey Maddren
Citizens for a Better Los Angeles