

Communication from Public

Name: MoveLA
Date Submitted: 08/08/2025 11:21 PM
Council File No: 22-1154-S2
Comments for Public Posting: Letter from MoveLA.



August 8, 2025

Los Angeles City Council
200 N. Spring Street
Los Angeles, CA 90012

Re: CF **22-1154-S2 Interactive Kiosks**

To the Los Angeles City Council:

We are writing in opposition to the motion in Council File 22-1154-S2, which calls for an RFP for digital advertising kiosks throughout the city.

Move LA built the coalition that campaigned on and passed Measures R (2008) and M (2016) to fund the expansion of our transportation network. Our mission is to reduce emissions from the transportation sector through mode shift, zero-emission infrastructure and vehicles, and building density of affordable housing near transit stops. Our advocacy on student transit passes, bus shelters, bus lanes, and service has led to significant victories in increasing transit ridership.

Move LA worked with Councilmember Nithya Raman and Councilmember Bob Blumenfield to create the RaiseLA fund to ensure the advertising money from STAP was used to directly pay for more bus shelters and transit amenities to improve the lives of bus riders. This landmark fund ensures the city will have a critical revenue stream to build shelters, bike lanes, and pedestrian safety improvements.

Since STAP has launched, the city has seen triple the revenue from the previous contract, new bus shelters going up every month, and extensive sidewalk repairs to help improve the lives of our residents and bus riders. Even with the delays from

lawsuits and the complications of permitting three thousand unique locations across the city, StreetsLA and STAP are making significant progress.

Our main opposition to the kiosk RFP is that it makes no sense. A kiosk program outside of STAP will cannibalize the ad revenue for the City's own program, reducing the RasieLA fund and directly hurting the building of more bus shelters and transit improvements for bus riders.

Bus riders spent 20 years waiting for the promise of shade and shelter, and two years into STAP, the city is sabotaging its own program again with no regard for bus riders. Even worse, by launching a new program, the City would reallocate limited staff time to approve digital kiosks that would provide no public benefit and would merely serve as large digital advertisements.

Please do not move forward with this RFP or make an amendment that an independent outdoor advertising expert do a thorough review of the kiosk program's revenue impact on STAP before the RFP is launched.

Sincerely,

A handwritten signature in dark ink, appearing to read "E. Lipmen", with a stylized, cursive script.

Eli Lipmen
Executive Director
Move LA
www.movela.org
Eli@movela.org

Communication from Public

Name: Norma O Chávez

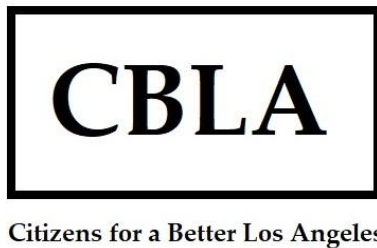
Date Submitted: 08/09/2025 01:51 PM

Council File No: 22-1154-S2

Comments for Public Posting: I support this motion and urge the City Council to include in this motion an Environmental Report as well as a Traffic Report to see what the effects the interactive kiosks will have in the community. I am Norma O. Chávez, vice-president of the Sun Valley Area Neighborhood Council, speaking on my behalf.

Communication from Public

Name: Casey Maddren/Citizens for a Better Los Angeles
Date Submitted: 08/10/2025 10:25 PM
Council File No: 22-1154-S2
Comments for Public Posting: Citizens for a Better Los Angeles submits the attached comments on the recent motion from Councilmembers Hernandez and McOsker regarding the kiosk and STAP programs.



August 10, 2025

Public Works Committee
Los Angeles City Hall
200 N. Spring Street
Los Angeles, CA 90012

Re: Interactive Kiosk Program, CF 22-1154-S2
Concerns and Suggestions

Members of the Public Works Committee,

Citizens for a Better Los Angeles (CBLA) is a non-profit public benefit corporation organized to protect the rights and promote the well-being of all people throughout Los Angeles County. We're writing to provide comments on the recent motion by Councilmembers Hernandez and McOskey regarding further actions to be taken regarding the development and implementation of the interactive kiosk program.

We understand that the City of LA needs increased revenue, and that the kiosks are one way of generating additional funds. We're glad to see that the motion asks BSS to investigate the regulatory framework and spatial requirements for kiosk installation, as well as estimated annual revenue and fiscal impacts to the Sidewalk and Transit Amenities Program (STAP). We're also very pleased to see that the City Tourism Department will be instructed to begin the environmental review process for the kiosk program.

We're writing to express some concerns we have about the program, make some suggestions that could improve it, and also to ask that the City make a meaningful effort to seek community input, which is likely to improve the chances of success. Following is a list of the points we'd like to address:

- * The City Council should start by rescinding Ordinance 187635 and develop a new ordinance specifically tailored to the kiosk program;
- * Sites for the kiosks should be limited to commercial corridors;
- * The City should make a meaningful effort to seek and incorporate community input;

- * Eliminate interactive elements, and acknowledge that the kiosks are primarily used for advertising;
- * Develop and approve a privacy policy that prohibits the collection of data by advertising structures in the public sphere;
- * Analysis of fiscal impacts to the Sidewalk and Transit Amenities Program.

Council should rescind Ordinance 187635 and develop new ordinance for kiosks

As the City considers new ad structures in the public right-of-way (ROW), the City must remember that this is **public** space. In recent years we've seen a proliferation of public and private uses encroaching on public space. Metro bike racks; e-scooters deployed by private companies (with riders often illegally using sidewalks); illegal billboards; sidewalk and street closures by clubs, restaurants and theaters. All of these uses impinge upon and sometimes prohibit the use of the public ROW by members of the public.

Ordinance 187635 is outrageously broad and automatically allows the installation of **any** structure in the public ROW that's related to an outdoor advertising program approved by the Board of Public Works. This gives private companies the unlimited right to install any structure as long as the program was approved by the BPW, an unelected body. This is an unacceptable giveaway, ceding an unlimited amount of public space to private interests. The Ordinance seems to have been designed to shut the public out of the process.

Ordinance 187635 should be rescinded, and a new ordinance developed with community input that is specifically tailored to the requirements of the kiosk program.

Sites for the kiosks should be limited to commercial corridors

Kiosks should only be placed in commercial corridors. They should be prohibited in ecologically sensitive areas, scenic corridors and residential neighborhoods.

The City should make a meaningful effort to seek and incorporate community input

In developing the kiosk program, the City should make a meaningful effort to seek and incorporate community input. In the best case scenario, the City would ask neighborhood councils to consider where kiosks might be placed in their communities. At the very least, the City should hold public meetings in each council district to gather community feedback regarding where the kiosks might be sited.

Eliminate interactive elements, acknowledge that the kiosks are for advertising

In promoting their kiosks, some companies highlight interactive features such as wayfinding, connections to 311 or the ability to summon a ride, as useful services that will benefit the public. In reality, nearly 100% of US adults between the ages

of 18 and 49 own a smart phone that can provide all of these services. The argument that the kiosks will provide significant benefits to the public is not credible. Let's be honest: The purpose of the kiosks is to propagate advertising.

For the few people who do use the interactive features, there are serious privacy concerns. Use of these features will likely involve the collection of sensitive info, including phone number, mobile device ID, e-mail address and/or location data. When the kiosks contain cameras, there is the danger they can be used for surveillance or for gathering biometric info. **While all kiosk companies say they want to protect your privacy, in reality all of them share data they collect with third party partners, and there are no meaningful protections in place to govern how they use the data.**

This is especially concerning as law enforcement agencies have rapidly adopted the practice of purchasing personal data from data brokers. To cite just one example:

Inside Fog Data Science, the Secretive Company Selling Mass Surveillance to Local Police

<https://www.eff.org/deeplinks/2022/08/inside-fog-data-science-secretive-company-selling-mass-surveillance-local-police>

The company, Fog Data Science, has claimed in marketing materials that it has "billions" of data points about "over 250 million" devices and that its data can be used to learn about where its subjects work, live, and associate. Fog sells access to this data via a web application, called Fog Reveal, that lets customers point and click to access detailed histories of regular people's lives. This panoptic surveillance apparatus is offered to state highway patrols, local police departments, and county sheriffs across the country for less than \$10,000 per year.

In Los Angeles, as ICE raids continue, we should be especially concerned about any device in the public sphere that has the ability to collect data from citizens.

By prohibiting interactive elements and the use of technology that captures data from personal devices, or cameras that could be used for surveillance, the city will eliminate privacy concerns. The primary purpose of the kiosks is to present advertising, and limiting their use only to advertising will not impact revenues.

Develop a privacy policy that prohibits collection of data by ad structures in public sphere

The City of LA should develop a privacy policy that prohibits the collection of personal data by ad structures in the public sphere. Advertising companies that want to do business within the city should be required to adhere to this policy. Without such a policy in place, the city could spend unnecessary time trying to evaluate the company's policy and/or negotiating standards. With an adopted policy in place, advertisers will know what the restrictions are, and they will know that they must abide by the policy if they wish to do business in the city.

Analysis of fiscal impacts to the Sidewalk and Transit Amenities Program

As part of the analysis of fiscal impacts to the STAP program, the city should consider the fact that kiosks could also be installed by Tranzito-Vector as part of the STAP program. This would eliminate the need for an RFP process and the selection of a new vendor. This would also simplify things for the Bureau of Street Services, enabling them to deal with a single vendor who could coordinate the installation of kiosks in conjunction with STAP, as opposed to competing with STAP for prime locations. In any case, the city should keep in mind that if a new kiosk program results in a reduction of STAP revenues, this could result in a reduction of the number of bus shelters serving transit riders.

We hope that these comments will be useful in the city's discussions about digital kiosks in LA. Please feel free to contact us if you have any questions. Thank you for your time.

Sincerely,
Casey Maddren
Citizens for a Better LA
contactcbla@tuta.com