

## Communication from Public

**Name:** Know History

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**Comments for Public Posting:** We all wish that automated photo-enforced traffic systems (hereinafter “APETS”) were a magic-bullet solution to improving traffic safety. Unfortunately, experience has shown that they are not. The promise that these systems will meaningfully improve safety is, in reality, a cruel hoax. These systems are about money. Money for the corporation that manufactures, maintains and operates the equipment. Money flows into politics to ensure the contracts are renewed. Financial incentives create a system that perpetuates itself. The financial model for APETS depends on continuous revenue generation. Citations must continue to be issued and mailed whether the violations are valid or not. False positives are incentivized. People are falsely accused. The LADOT report completely ignores the city’s own recent history with these systems. In 2011, the people of Los Angeles succeeded in removing APETS from the city. At the time it was a victory to eliminate what had become a deeply unpopular program. That history is recent, relevant, and essential to any evaluation of these systems today. Ignoring it is a serious failure. This omission calls into question the credibility of the LADOT report as a whole. When combined with other deficiencies the document provides little meaningful guidance for such an important decision. Before rushing to repeat past mistakes, decision-makers should review the events of leading up to 2011, when Los Angeles eliminated these widely disliked systems. History matters. Ignoring it risks repeating the same cycle of public backlash and political consequences. The corporation involved in APETS has a clear objective: securing contracts and ensuring those contracts are renewed year after year. Once the systems are installed, the financial incentives make them difficult to remove. Maintaining the revenue stream becomes the central objective. This dynamic undermines public trust and creates the appearance—if not the reality—of corruption. The report identifies the corporate “operator” that would run the system: Verra Mobility. In practical terms, the operator is the corporation that ultimately benefits from the flow of citation revenue through lease, maintenance and operational contracts with the city. Large financial consequences exist for motorists who receive one of these tickets. It triggers interactions with insurance companies that significantly increases a driver’s costs. This basic reality—well understood by any

driver—is not meaningfully discussed in the report. Past history in Los Angeles showed that APETS produced little improvement in traffic safety. What they did produce was controversy, public resentment, and anger over the motivation. The LADOT report does not address these historical outcomes. The corporations promoting began efforts in Sacramento with legislation that created funding for pilot programs. The goal appears simple: secure contracts with cities and restart the revenue flow. Institutional inertia and the financial commitments ensure continuation. Installing a large-scale surveillance system raises significant questions about privacy and data security. Even with policies and safeguards the risk is not eliminated. Data systems can be hacked, misused, or repurposed by other authorities. Once the data exists, the potential for misuse exists. APETS are meant to be deterrents. If that deterrence were truly effective, one would expect violations and therefore citation revenue to decline significantly over time. Yet the projections in the report assume continuing revenue streams. If the goal is deterrence, why are sustained revenues expected? Cities must make payments to the corporation operating APETS. System sensitivity can be adjusted. Revenue becomes necessary to sustain the program itself and the incentives become twisted. The result is a system that residents perceive as fundamentally unfair. It erodes public trust in local government, trust that is already fragile. The removal of APETS in 2011 occurred when city council members faced strong public opposition and upcoming elections. Voters made their views clear – vote to renew the contracts and you will be out of a job council member. The very same people who are in favor of APETS today will be voting you out of office tomorrow as the cruel reality becomes evident. Studies and past experiences of APETS have shown that while certain violations may decline, other types of accidents, particularly rear-end collisions, can increase. Drivers alter routes to avoid monitored areas, merely shifting accidents from one location to another. The history of APETS in Los Angeles reveals a failed system. Ignoring the history would be a serious mistake. I know that history and I am opposed to re-starting a failed system that becomes legalized extortion and victimizes innocent drivers.