
Subject: Aug 21 SFMTA agenda - Contract with new red light camera vendor ATS for 21 to 45 months

Date: Sun, 19 Aug 2018 16:04:26 -0700

From: Jim <jim

Reply-To: jim@

To: MTABoard@SFMTA.com, cac@sfmta.com, Roberta.Boomer@sfmta.com

8-19-18

Venue: Item 10.4 on Aug. 21 SFMTA Board agenda

Subject: Contract with new red light camera vendor ATS for 21 to 45 more months

For the SFMTA Board:

Is it true that red light cameras reduce collisions? The staff report says that the cameras have reduced collisions "by up to 40%" (page 2, near bottom), while the SFMTA's own *Annual Report 2016* (dated May 4, 2018, copy attached) shows that following the installation of the cameras there were reductions at only two of the nineteen intersections studied. (Also attached is a copy of the one-year-older *Annual Report 2015*, dated March 28, 2016, as its intersection-by-intersection pages provide details and dates about the engineering improvements made to the intersections while the *Annual Report 2016* does not. The two reports are best read side by side - the later of the two reports has narrowed the focus to just those collisions caused by red light violations. See note 5 on page 2 of that report.) [The annual reports are available in Set # 4 on the San Francisco Docs page at highwayrobbery (dot) net.]

Further to the question of whether red light cameras are effective, there is a Case Western study which came to national attention via a July 19 article in phys (dot) org. The study was published (posted) in the Social Science Research Network on November 30 last year. The authors made an in-depth statistical analysis - with controls - of the camera programs in Houston (which shut its cameras down in 2012) and Dallas and found, "... the cameras changed the composition of accidents, but **no evidence of a reduction in total accidents or injuries.**" (Abstract, page 1 of the pdf of the study, emphasis added.) The study further found, "... the model suggests that **the camera program led to a decrease in social welfare.**" (Page 5 of the pdf of the study, line 5, emphasis added.) (The study is available on the University's website; Google the title, *Criminal Deterrence when there are Offsetting Risks: Traffic Cameras, Vehicular Accidents, and Public Safety.*)

You probably know that other California cities have ended their camera programs. (29 programs remain out of the 103 that once operated.) Attached is a compilation of comments made by police chiefs, city managers, firemen and councilmembers in cities having a collective 200 years of experience with red light cameras. (The attachment has "Candor" in the file name.) .) [The Candor compilation is available in section 4.5 on the Industry PR - and Ours page at highwayrobbery (dot) net.]

If You Decide to Continue

In my 2017 letter (below) I suggested that you require the contractor to provide a way so that the egregiousness of the violations (how late into the red) can be reviewed each month. I provided an example of a report from Culver City (still attached). While the proposed contract includes (at D(2)(j) on page A-11) a requirement to report on "average red seconds of Violations and issued Citations" for each camera, the resulting figure will be of no use for evaluating performance if the particular camera is monitoring both straight thru and right turn violations, as right turn violations often occur multiple seconds into the red while straight thru violations are mostly fractions of a second. I suggest that the contract should require that the average (or other method of conveying egregiousness) be lane-by-lane, as in the example.

Finally, I see nothing in the contract dealing with the violations committed by the approx. 2 million privately owned vehicles having the confidential registrations allowed by CVC 1808.4. The Requirements for Issuing Citations (page A-6 of the contract) should require that they be processed like any other violation, and the monthly reports (page A-11) should detail the disposition of those violations, as a separate category.

Regards,

Jim

cc: Media, Supervisors & Candidates, CAC (SFMTA Citizens' Advisory Council), MTC

----- 2017 Message -----

Subject:Red light cams on July 18 SFMTA agenda - possible new vendor, ticketing way down

Date:Sun, 16 Jul 2017 16:09:47 -0700

From:Jim <jim>

Reply-To:jim

To:MTABoard@SFMTA.com, Roberta.Boomer@sfmta.com

7-15-17

Venue: Red light cameras, item 10.8 on July 18 Board agenda

[[]] = edited in 2018

For the SFMTA Board:

The staff report (copy attached) mentions a possible change to a new vendor, which could turn out to be American Traffic Solutions (ATS), the company which provides the cameras in Millbrae, Capitola, Covina and Cathedral City [[Cathedral City closed its cameras in June 2018]] - and formerly provided cameras to South San Francisco, Davis, Cerritos, Los Angeles, Murrieta, Pasadena, San Bernardino, San Diego, San Juan Capistrano and Santa Maria. [[And Cathedral City.]]

I have watched ATS operate in the cities mentioned above and would like to pass a couple of my observations along to the Board.

1. In most of those cities, the emphasis was on rolling right turn tickets. ATS has mostly ignored the CVC 21455.5(i) requirement to do an annual report breaking out the numbers of right turn, left turn and straight thru tickets (example from Napa, a non-ATS city, attached), but I have made the following estimates for the ATS cities still operating:

Millbrae: 81% right turns, mostly at foot of Millbrae Ave. offramp from the Sbd 101.

Capitola: 38% right turns.

Covina: 73% right turns.

Cathedral City: 76% right turns.

In the context of a potential heavy emphasis on right turn tickets, I'd like to pass along a Dec. 26, 2014 Wall Street Journal interview of the (then) president of Redflex, the camera company having the most installations in California: "Mr. [James] Saunders suggests jurisdictions refrain from issuing a [rolling right] ticket except when a pedestrian is in the crosswalk." The headline was, "Can the Red-Light Camera Be Saved? - Money-hungry politicians discredit a hopeful safety innovation." (A Jan. 22, 2015 column in the Dallas Morning News confirmed the statement The Journal had attributed to Saunders: *"When I asked Redflex spokeswoman Jody Ryan about her boss' comments urging cities to lighten up on rolling reds, she answered, "It only makes sense that Jim is going to say, 'Look, we need people to be thoughtful about how they are implementing these programs and how they are issuing citations.' It wasn't that shocking."*)

2. ATS is missing a feature that, I think, should be added to the RFP. Another of the photo enforcement companies active in California (and no, I don't have a tie of any sort to any photo enforcement company) produces a bar graph report (example attached) showing the egregiousness of the violations (how late into the red the violators were) as well as what lane they were in, the time of day, and the day of the week. Of the three likely bidders, they are the only company that includes that report as a standard feature of their reporting suite; your current vendor does not, nor does ATS. I suggest that you require all bidders to provide an equivalent report.

The new contract will be for five years, and if it is with a new vendor it is likely that you will be locked in, with no easy way to cancel; any new vendor will need several years of regular monthly payments from you in order to recoup its costs to install the new cameras, so probably will not agree to a Termination for Convenience ("escape") clause. So, you will be stuck with the vendor you pick and the number of cameras you contract for. The proposed extension (to Dec. 2018) reduces the number of cameras, to 20. I suggest that the number should be seven or less. Here is the basis for that opinion.

In 2016 MTA staff did a camera-by-camera examination (copy attached) of the effect the program has had upon accidents and found that the installation of a red light camera seldom was followed by a drop in accidents. Instead, the drops occurred after engineering improvements like making the yellows longer, adding an all-red interval (both of which are cheap to do), the addition of an arrow for left turns, or a general upgrade to the signal. (In one instance - see

page 12 of the report - staff conceded what one of the graphs shows, that the camera may have had no effect whatsoever.)

Beginning in September 2016 you reduced ticketing by 77%; during the eight-month period September 2016 thru April 2017 you issued a total of just 1942 tickets compared to the average 8281 tickets you issued in the same eight-month periods a year and two years before. (The month-by-month and camera-by-camera ticketing figures, just updated to include May 2017 [[now April 2018]], are available in a table on the San Francisco Docs page at highwayrobbery [dot] net.)

So, here's two ways to obtain the number of cameras the MTA should initially contract for. (If needed in the future, more cameras can be added, via contract amendment.)

1. It will take about 50 tickets a month for a camera to pay for itself, and In May 2017 (see the counts [[at highwayrobbery [dot] net]]) the total ticketing citywide was 382 - and only five cameras issued more than ten tickets. The 382 tickets issued in May would support, at most, seven cameras.
2. If you have somehow predetermined that there shall be 1000+ violators each month, never decreasing over the five-year run of the contract, and are willing to endure accusations that many of the tickets are "Mickey Mouse" because they are for right turns, then you can break even with 20 cameras and you should contract for same, as recommended by staff.

Regards,

Jim