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November 9, 2026

SUBMITTED VIA EMAIL:
Attention: Skye Matthews, Analyst | matthewss@nyassembly.gov

The Honorable Nily Rozic
New York State Assembly
Legislative Office Building
Chair, Committee on Consumer Affairs & Protection
Albany, New York 12224

The Honorable John McDonald
New York State Assembly
Legislative Office Building
Chair, Committee on Government Operations
Albany, New York 12224

The Honorable Michaelle Solanges
New York State Assembly
Legislative Office Building
Chair, Committee on Local Governments
Albany, New York 12224

RE: New York Assembly Automated License Plate Reader (ALPR) Hearing

Dear Assembly Members Rozic, McDonald and Solanges:

On behalf of Metropolis Technologies, I respectfully submit the following comments related to Automatic License Plate Reader (ALPR) following the New York Assembly's hearing on Monday, November 9, 2026. We appreciate the legislature's intent to regulate ALPR, which regrettably has become associated with law enforcement and other security misuse cases. However, ALPR has been used effectively and safely by the parking industry, along with other industries such as toll collectors, to facilitate payment and access control for decades.

Who is Metropolis, What Do We Do & What's the Social Benefit?

Metropolis' platform is built for consensual parking transactions. A driver that uses a Metropolis-enabled parking facility is completing a payment transaction, comparable to a car driving through an automated highway tollbooth (i.e., similar to E-Z Pass). Recognition of a vehicle's license plate is a mechanism for billing and seamless access to parking facilities, as opposed to monitoring or tracking a vehicle's past or future travels.

Most importantly, this is only done with the consumer's explicit consent after the consumer affirmatively opts into the platform. Metropolis is deploying our computer vision technology across the largest parking network in the United States, allowing millions of customers to transact seamlessly when accessing a parking facility. Amongst the many benefits of Metropolis's technology include giving people back time through friction-less parking, reducing traffic congestion, increasing personal safety at garages by not having to exit your vehicle, reducing reliance on cash payments and minimizing credit card fraud.

What is Metropolis' Footprint & Social Impact?

We employ over 4000+ New Yorkers (22,000 employees nationwide) in our operations across over 380+ metro locations (4500+ locations nationwide), and over 180+ full time corporate employees in our Manhattan office. We are a parking operator serving clients that include major hotels, commercial properties, malls, transit and airport authorities, universities and hospitals.

Metropolis is also proud to be a "Second Chances" employer providing employment opportunities to veterans, formerly incarcerated individuals and victims of domestic violence. While we are deploying technology to enable frictionless experiences, **we are not eliminating jobs**. To the contrary, we are retraining and repurposing our onsite parking professionals, who previously exclusively solely collected payments inside booths, to now create personalized customer engagement and monitoring garage activity for safety concerns (i.e., such as identifying cars that may have accidentally left their keys in their cars to avoid theft). We train them to use computer tablets and other technology tools to customize and personalize experiences for our customers.

How is Metropolis Using ALPR?

While Metropolis' computer vision technology uses state-of-the-art capabilities and camera hardware, it functions similarly to the commonly known automatic license plate readers (ALPR), the same technology that has been used safely and effectively by toll and parking operators for payment transactions for decades. Overly broad restrictions on ALPR risk inadvertently dismantling routine commercial payment systems across New York State. I would also note that using ALPR for payment processing is not uncommon. Toll collectors have used this technology for years. For example, the Metropolitan Transit Authority has deployed ALPR technology for its congestion pricing program.

It is worth emphasizing, consumers affirmatively opt in to Metropolis' platform—linking their vehicle registration directly to a payment method—to enable seamless, ticketless entry and exit at parking facilities and tollways. While legislative safeguards targeting law enforcement misuse are understandable, indiscriminate bans create severe collateral damage for private operators and everyday commuters who rely on secure, consent-driven drive-through commerce.

Does Metropolis Consider Privacy & Provide Data to Law Enforcement?

Metropolis takes privacy and security of consumer data stewardship seriously. Hence, we collect the bare minimum of data essential to facilitate a commercial payment transaction. To clarify our operational model and privacy architecture:

- **Closed System:** Metropolis operates a closed, proprietary network. We ***do not sell, rent, or share user data with third parties or law enforcement for surveillance purposes.*** Further, we do not provide our data to law enforcement unless presented with a valid subpoena or judicial warrant.

- **Consensual & Commercial:** License plate reads are used exclusively to calculate time parked and process payment for authorized vehicle entries. **We do not track a person's movements.**

- **High Standards of Audit and Cybersecurity:** Our data security practices are independently audited to SOC 2, Type 1 standards to protect payment and user data.

- **Encryption & U.S. storage:** All data is encrypted at the point of capture and stored in U.S.-based cloud infrastructure.

- **Customer Ownership of Data:** Customers can delete their Metropolis account at any time or request the deletion of their Metropolis account and data at any time.

- **Privacy:** We have a very comprehensive privacy policy that is publicly available on our website.

What is Metropolis Asking of the Assembly?

While the primary scope of the current hearing appears aimed at surveillance ALPR uses, systems designed for ongoing commercial transactions inherently require retaining user account information and transaction records for active billing, dispute resolution, and continuous service. Requiring immediate or short-term deletion of ALPR scan data indiscriminately could render modern, checkout- free parking payment systems inoperable for New York consumers and businesses.

- **Preserve Checkout-Free Infrastructure & Avoid Business Uncertainty:** Metropolis relies on state-of-the-art computer vision and license plate recognition to power contactless parking at private commercial facilities (e.g., hotels, hospitals, retail centers, airports, and private garages). Without explicit statutory carve-outs for permissible commercial use cases, a broad ALPR ban could introduce severe operational uncertainty for platforms like Metropolis in New York. Other jurisdictions—notably California and Illinois—have already recognized this distinction by introducing clear exemptions for example, airports, private parking and toll operators, in their proposed ALPR state policies. Commercial payment processors operating on consumer consent should not be regulated under the same framework as law enforcement surveillance. To that end, we welcome the opportunity to collaborate with members of the New York Legislature as you evaluate and draft any ALPR-related legislation.

- **Recognize Account-Based Billing:** Metropolis's model requires retaining user account information and transaction histories to recognize returning drivers and execute seamless, automated billing

(functioning similarly to an “E-Z Pass for parking"). Short data retention mandates and blanket private bans would render this consent-based commercial model technically and legally inoperable. As stated previously, we do not share driver data with cities or clients, unless it’s anonymized and aggregated.

Legislate for the issue:

We support a “surgical approach” to this issue. If the goal is to prevent law enforcement and other government agency misuse of ALPR data, then consider legislative language tailored to specifically regulate these agencies' access to consumer data. Proportionate data retention rules should reflect the purpose data serves — rather than a single blanket timeline applied regardless of context. Access to surveillance data should always expire; Transaction data, like billing, dispute resolution, safety and audit data may be retained for reasonable use, ***especially when it's obtained by a consumer affirmatively opting in to such use for a commercial payment transaction.***

We welcome the opportunity to meet with your office to discuss potential solutions that reduce surveillance abuses without unintentionally banning commercial payment infrastructure. We would be happy to share our thoughts on any potential legislative language that would satisfy our concerns and enable our customers, employees, clients and businesses to continue to operate in New York without disruption.

Please do not hesitate to contact me at (347) 703-2069 if I can be of further assistance. Finally, please do not hesitate to contact our New York government affairs representatives at Yoswein New York – Joni Yoswein (joni@yny.com) or Jeff Denman (jeff@yny.com) at (212) 233-5700 – with any questions.

Respectfully submitted,

George A. Ortiz
Director of Government Relations