



July 24, 2019

The Honorable Yvette Clarke
2058 Rayburn House Office Building
Washington, DC 20515

The Honorable Ayanna Pressley
1108 Longworth House Office Building
Washington, DC 20515

The Honorable Rashida Tlaib
1628 Longworth House Office Building
Washington, DC 20515

Dear Representatives Clarke, Pressley, and Tlaib:

I write to thank you for introducing the No Biometric Barriers to Housing Act of 2019 and to commend you for addressing the issue of facial recognition technology. As a nonpartisan, independent watchdog that investigates and exposes abuse of power and champions reforms to achieve a more effective, ethical, and accountable government that safeguards constitutional principles, the Project On Government Oversight is proud to endorse this important legislation.

The No Biometric Barriers to Housing Act would prevent dangerously inaccurate facial recognition technology from being implemented in public housing. Given the serious risks of misidentification and invasion of privacy posed by facial recognition, this is a sensible step. “Real-time” facial recognition systems that scan everyone recorded by a camera against a watchlist have registered false matches over 90 percent of the time in multiple law enforcement pilot initiatives.¹ Researchers at the Massachusetts Institute of Technology, the American Civil Liberties Union, and even an FBI expert all found that facial recognition technology is less effective in properly identifying women and people of color, raising civil rights concerns.²

¹ Big Brother Watch, *Face Off: The lawless growth of facial recognition in UK policing*, May 2018, pp. 3-6. <https://bigbrotherwatch.org.uk/wp-content/uploads/2018/05/Face-Off-final-digital-1.pdf> (Downloaded July 23, 2019)

² Joy Buolamwini and Timnit Gebru, “Gender Shades: Intersectional Accuracy Disparities in Commercial Gender Classification,” *Proceedings of Machine Learning Research*, Vol. 81, February 2018. <http://proceedings.mlr.press/v81/buolamwini18a/buolamwini18a.pdf>; Jacob Snow, “Amazon’s Face Recognition Falsely Matched 28 Members of Congress With Mugshots,” American Civil Liberties Union, July 26, 2018. <https://www.aclu.org/blog/privacy-technology/surveillance-technologies/amazons-face-recognition-falsely-matched-28>; Brendan Klare et al., “Face Recognition Performance: Role of Demographic Information,” *IEEE Transactions on Information Forensics and Security*, Vol. 7, Issue 6, December 2012, pp. 1789-1801. http://biometrics.cse.msu.edu/Publications/Face/Klareetal_FaceRecognitionPerformance_RoleOfDemographicInformation_TIFS12.pdf (All downloaded July 23, 2019)

Public housing residents should not have to fear entering their own homes because an ineffective computer program could misidentify them to law enforcement. And absent the type of appropriate limits advanced in this bill, police encounters could become more fraught and frequent, damaging police-community relations.

By preventing deployment of this error-prone surveillance technology in public housing, this legislation would protect the civil rights, civil liberties, and safety of residents. We encourage Congress to quickly take up and pass this important legislation on a bipartisan basis, and to continue to find commonsense and effective limits for facial recognition technology.

Sincerely,

Danielle Brian
Executive Director