



San Diego Metropolitan Transit System (MTS)
Video System Procedures
(Last revised on 9/16/2026)

I. Purpose:

MTS places the highest priority on safety. Placing video cameras on certain MTS vehicles and facilities and utilizing body worn camera for security personnel is one of the ways MTS aims to help ensure passenger, public and personnel safety and general security for MTS operations and property.

The purpose of this document is to provide a comprehensive, high level summary of MTS's current procedures as it involves video cameras. This includes a description of MTS video systems, ownership, access, proper use, management, storage, custody, control, and retrieval of video recordings.

II. Definitions:

Video System refers to any system or device that enables continuous or periodic video, or video and/or audio recordings, with the capacity to view or record MTS owned or controlled spaces, which includes the closed-circuit television cameras (CCTV) and related equipment, and recordings. Personal web cameras connected to personal computers, or recordings of telephone communications, are not included in the definition of Video System.

Bus Vehicle refers to a bus vehicle, whether operated directly by MTS or by MTS' contractors for fixed route bus service and complementary paratransit and mini-bus service.

Taxicab refers to a vehicle, operated directly by independent contractors, dispatched by taxicab dispatch service organization, a subcontractor to MTS' contractor for complementary paratransit and mini-bus service, that is used for passenger revenue service.

Trolley Vehicle refers to a trolley vehicle used for passenger revenue service.

Bus Non-Revenue Vehicle refers to administrative vehicles used by MTS Bus Department, whether operated directly by MTS or by MTS's contractors, that do not provide passenger trips. This includes: employee shared pool vehicles, relief vehicles, supervisory vehicles, and service trucks.

Non-Revenue Vehicle refers to administrative vehicles used by MTS that do not provide revenue passenger trips. This includes: employee shared pool vehicles, relief vehicles, supervisory vehicles, inspector vehicles, security vehicles, administrative vehicles, and service trucks/vehicles.

Facilities refers to trolley stations, transit centers, transit stations, Transit Store, maintenance facilities, certain bus stops, certain administrative lobbies, certain employee common areas, and parking lots/garages. Please note, not all bus stops, administrative lobbies and employee common areas have a Video System.



Body Worn Camera (BWC) refers to a wearable Video System by MTS or MTS' contractor for security services with the capacity to view or record interactions and events MTS Security are involved with.

III. Video Systems:

MTS owns, or has contractual rights for certain access to, the following Video Systems described in Table 1: Video Systems.

Table 1: Video Systems

Location of Video System	Video System	Ownership
Fixed Route Bus and Complementary Paratransit Vehicles	Luminator	MTS
Fixed Route Bus Vehicles (if operated by MTS' contractor for fixed route)	Lytx	MTS' contractor for fixed route; MTS has contractual rights to review video consistent with MTS oversight role however since MTS does not own the video system, it is not subject to disclosure through a Public Records Act request.
Mini-bus Vehicles	Safefleet	MTS
Complementary Paratransit and Mini-bus Vehicles	Lytx	MTS' contractor for complementary paratransit and mini-bus service; MTS has contractual rights to review video consistent with MTS oversight role however since MTS does not own the video system, it is not subject to disclosure through a Public Records Act request.
Taxicabs dispatched by MTS' contractor for complementary paratransit and mini-bus service's.	Samsara Dash Cams	Taxicab Dispatch Service Organization subcontracted by MTS' contractor for complementary paratransit and mini-bus service; MTS has contractual rights to review video consistent with MTS oversight role however since MTS does not own the video system, it is not subject to disclosure through a Public Records Act request.
Trolley Vehicles	MobileView, owned by Safefleet	MTS
Non-Revenue Vehicles (some MTS in-house vehicles) Effective July 1, 2025, these cameras will be phased out	Safefleet	MTS

Location of Video System	Video System	Ownership
as appropriate and replaced with Motive Technologies		
Non-Revenue Vehicles (MTS' contractor for fixed route-operated)	Lytx	MTS' contractor for fixed route bus service; MTS has contractual rights to review video consistent with MTS oversight role however since MTS does not own the video system, it is not subject to disclosure through a Public Records Act request.
Non-Revenue Vehicles (MTS' contractor for complementary paratransit and mini-bus-operated)	Lytx	MTS' contractor for complementary paratransit and mini-bus service; MTS has contractual rights to review video consistent with MTS oversight role however since MTS does not own the video system, it is not subject to disclosure through a Public Records Act request.
Non-Revenue Vehicles (MTS in-house vehicles)	Motive Technologies	MTS
Facilities	Avigilon	MTS
Body Worn Camera (BWC)	Axon	MTS
	Visiologix	MTS' contractor for security services, if for contracted security personnel; MTS has contractual rights to review and contractual rights to produce video consistent with MTS Public Records Act obligations.

IV. Recording Protocols:

The recording protocols and real time monitoring capability of Video Systems are described at Table 2: Recording Protocols.

Table 2: Recording Protocols

<u>Location of Video System</u>	<u>Video System</u>	<u>Recording Protocols</u>	<u>Real Time Monitoring Capability</u>
Fixed Route Bus and Complementary Paratransit Vehicles	Luminator	Automatic recording if vehicle ignition is on; if interior motion sensor is triggered; and 10 minutes after ignition is turned off.	Real time monitoring will be capable through mSet, a new platform that MTS is transitioning all revenue service vehicles to. It is also possible in the current platform if a bus is connected to a secure MTS wireless network

<u>Location of Video System</u>	<u>Video System</u>	<u>Recording Protocols</u>	<u>Real Time Monitoring Capability</u>
			(i.e. when not in revenue service and within a particular maintenance facility), on a case by case basis by authorized users.
Fixed Route Bus Vehicles (if operated by MTS' contractor for fixed route)	Lytx	Automatic recording if (a) vehicle ignition is on; and (b) 10 minutes after ignition is turned off. Two (2) camera system (one (1) internal facing and one (1) forward facing).	Capability for real time monitoring when vehicle ignition is on or if manually activated by authorized users depending on power and vehicle status, on a case by case basis.
Mini-bus Vehicles	Safefleet	Automatic recording if vehicle ignition is on; if interior motion sensor is triggered; and 10 minutes after ignition is turned off.	Real-time monitoring capability is not available during revenue service. It is possible if a bus is connected to a secure MTS wireless network (i.e. when not in revenue service and within a particular maintenance facility), on a case by case basis by authorized users.
Complementary Paratransit and Mini-bus-Vehicles	Lytx	Automatic recording if (a) vehicle ignition is on; and (b) four hours (time can be changed) after ignition is turned off. Two (2) camera system (one (1) internal facing and one (1) forward facing).	Capability for real time monitoring when vehicle ignition is on or if manually activated by authorized users depending on power and vehicle status, on a case by case basis.
Taxicabs dispatched by MTS' contractor for complementary paratransit and mini-bus service.	Samsara Dash Cams	Automatic recording if (a) vehicle ignition is on; and (b) 10 minutes after ignition is turned off. Two (2) camera system (one (1) internal facing and one (1) forward facing).	No.
Trolley Vehicles	MobileView, owned by Safefleet	Automatic recording so long as vehicle ignition is on.	Dependent on wireless connection, MTS has capability for real time monitoring if connected to a secure MTS wireless network at trolley stations or trolley maintenance yards, on a case

<u>Location of Video System</u>	<u>Video System</u>	<u>Recording Protocols</u>	<u>Real Time Monitoring Capability</u>
			by case basis by authorized users.
Non-Revenue Vehicles (some in-house MTS vehicles) Effective July 1, 2025, these cameras will be phased out as appropriate and replaced with Motive Technologies	Safefleet	Automatic recording if vehicle ignition is on; and 10 minutes after ignition is turned off.	No.
Non-Revenue Vehicles (for MTS' contractor for fixed route bus)	Lytx	Automatic recording if vehicle ignition is on; and 15 minutes after ignition is turned off. Two (2) camera system (one (1) internal facing and one (1) forward facing).	Capability for real time monitoring when vehicle ignition is on or if manually activated by authorized users depending on power and vehicle status, on a case by case basis.
Non-Revenue Vehicles (for MTS' contractor for complementary paratransit and mini-bus service operated vehicles)	Lytx	Automatic recording if (a) vehicle ignition is on; and (b) four hours (time can be changed) after ignition is turned off. Two (2) camera system (one (1) internal facing and one (1) forward facing).	Capability for real time monitoring when vehicle ignition is on or if manually activated by authorized users depending on power and vehicle status, on a case by case basis.
Non-Revenue Vehicles (in-house MTS vehicles, except for vehicles involved in Transportation Security Administration (TSA) operations)	Motive Technologies	Automatic recording if vehicle ignition is on; and 10 minutes after ignition is turned off for exterior camera. On a case by case basis with Office of General Counsel approval, certain non-revenue vehicles may have audio recording capabilities removed if the employees driving the vehicles are engaged in sensitive, safety, or other confidential communications, however video recording capabilities remain turned on in these instances.	Capability for real time monitoring when vehicle ignition is on or if manually activated by authorized users depending on power and vehicle status, on a case by case basis.

<u>Location of Video System</u>	<u>Video System</u>	<u>Recording Protocols</u>	<u>Real Time Monitoring Capability</u>
Facilities	Avigilon	Continuous, regardless if facility is closed.	Real time monitoring capability is not available at all facilities. Only if facility is connected through MTS secure fiber connection, on a case by case basis by authorized users.
Body Worn Camera (BWC)	Axon	Only when activated, when such use is appropriate for the proper performance of duties and as consistent with Security Department SOPs (SOP 200.5); and 30 seconds before activation.	No.
	Visiologix		

V. Use:

Video Systems may be used for the following reasons: safety monitoring; transit operation analysis; safety incident investigation; passenger complaint investigation; training; personnel performance reviews and investigations; external law enforcement investigations; internal security investigations; for use as evidence in criminal/civil prosecutions; claims/litigations; response to Public Records Act requests; responses to subpoenas; and as otherwise required by law.

VI. Authorizing Access to Video System:

Multiple departments are involved in the management and use of the Video Systems. Thus, the individual responsible for the Video Systems varies depending on the task and type of Video Systems. Access to a Video System, and appropriate credentials (e.g. right to view or right to export) is approved as described in Table 3: Authorizing Access to Video System.

Table 3: Authorizing Access to Video System

<u>Location of Video System</u>	<u>Video System</u>	<u>Authorizing Access to Video System</u>
Fixed Route Bus and Complementary Paratransit Vehicles	Luminator	If MTS staff, Employee Supervisor and Human Resource approval required; Access facilitated by IT Department. If MTS' contractor for fixed route bus service staff, to add access and determine the appropriate credentials, MTS Manager of Contract Services approval required; Access facilitated by IT Department. If MTS' contractor for complementary paratransit and mini-bus service staff, to add access and determine the appropriate credentials, MTS Manager of Paratransit and Mini-bus Service approval required; Access facilitated by IT Department.
Fixed Route Bus Vehicles (if operated by MTS' contractor for fixed route)	Lytx	For MTS' contractor for fixed route bus service staff, its General Manager and Human Resource approval is required.
Mini-bus Vehicle	Safefleet	For MTS' contractor for complementary paratransit and mini-bus service staff, to add access and determine the appropriate credentials, MTS Manager of Paratransit approval required; Access facilitated by IT Department.
Complementary Paratransit and Min-bus Vehicles	Lytx	For MTS' contractor for fixed route bus service staff, its General Manager and Human Resource approval is required.
Taxicabs dispatched by MTS' contractor for complementary paratransit and mini-bus service.	Samsara Dash Cams	For MTS' contractor for complementary paratransit and mini-bus service staff, to add access and determine the appropriate credentials, MTS Manager of Paratransit approval required.
Trolley Vehicles	MobileView, owned by Safefleet	Employee Supervisor and Human Resource approval required; Access facilitated by IT Department.

<u>Location of Video System</u>	<u>Video System</u>	<u>Authorizing Access to Video System</u>
Non-Revenue Vehicles (some in-house MTS vehicles)) Effective July 1, 2025, these cameras will be phased out as appropriate and replaced with Motive Technologies	Safefleet	Director of Transportation; Director of Maintenance; or Manager of Safety approval required.
Non-Revenue Vehicles (for MTS' contractor for fixed route bus service)	Lytx	For MTS' contractor for fixed route bus service staff, its General Manager and Human Resource approval is required.
Non-Revenue Vehicles (for MTS' contractor for complementary paratransit and mini-bus service operated vehicles)	Lytx	For MTS' contractor for complementary paratransit and mini-bus service staff, its General Manager approval is required.
Non-Revenue Vehicles (in-house MTS vehicles)	Motive Technologies	Director of Transportation or Director of Fleet & Facility Maintenance approval required; Access facilitated by IT Department
Facilities	Avigilon	Employee Supervisor and Human Resource approval required; Access facilitated by IT Department. CEO approval is required for any third-party access (See Section X(2): "Live Feed Access MOUs").
Body Worn Camera (BWC)	Axon	For MTS staff, Security Systems Administrator and Human Resource approval required; Access facilitated by IT Department.
	Visiologix	For MTS' contractor for security services, approval from the contractor's on-site IT/Administrative staff required.

VII. Video Recording Storage

Each Video System has the capability to view, and/or download video recordings. A video recording that is not marked for preservation is maintained within the applicable server/drive/device, until the storage capacity/range is met (See Section IX: "Video Retention"). A video recording that is marked can be saved for longer periods if it is downloaded and saved on the network in the applicable

department-specific drive. Video saved on the network will be retained until at least the minimum statute of limitations period on a claim has passed (6 months to 2 years), or as otherwise required by law.

VIII. Access to Video Recording

Video that has been marked and saved to the network may be shared in a viewable format with MTS or contractor staff for training, investigative, and reporting purposes consistent with Section V: “Use”. Video recordings may be shared with third parties, according to the parameters identified in Section X: “Record Request for Video System Recordings”.

IX. Video Retention

In general, the amount of time that video recordings are retrievable depends upon several factors: the number of cameras, the method of recording, the storage capacity allocated for recordings, the resolution of the cameras, and the amount of in-service time/activity that the cameras are recording.

The MTS Video System is extensive, including multiple cameras at Facilities, on Bus Vehicles, and Trolley Vehicles. The technical specifications for each system limits how long the system retains the full un-marked video recordings before it automatically records over – generally between 7 and 60 days, as described in Table 4: Video Retention.

Costs to store all un-marked video recordings for 1 year is estimated to be an additional \$18-20 million annually, which is not feasible under current budget constraints.¹ Rather than store all un-marked video recordings for this period, MTS video retention focuses on incidents that have been “marked and saved” by MTS staff because of a specific incident or investigation. If marked and saved, the video recordings are retained for at least 1 year, or longer if a complaint or investigation is still active. Separate rules apply for Body Worn Camera.

Video retention processes are described at Table 4: Video Retention.

Table 4: Video Retention

Location of Video System	Video System	Minimum Legally Required Retention	Current Retention Capability for Un-Marked Video Recordings	Current Retention Period, if Marked and Saved to Network
Fixed Route Bus and Complementary Paratransit Vehicles	Luminator	1 year, <i>unless</i> technology to store recorded data for 1 year in an economically and technologically	About 7-21 days, depending on how often the vehicle is in revenue service.	1 year on VIM/mSET, or up to 3 years as long as existing storage space permits; indefinitely if

¹ This estimate was prepared by IT staff in December 2024. MTS will continue to evaluate if technology improvements will allow the video storage period to be extended beyond the capabilities identified in Table 4.

Location of Video System	Video System	Minimum Legally Required Retention	Current Retention Capability for Un-Marked Video Recordings	Current Retention Period, if Marked and Saved to Network
		feasible manner is not available. (See feasibility analysis in Section IX) <i>See Pub. Util. Code 99164</i>		preserved for pending litigation.
Fixed Route Bus Vehicles (if operated by MTS' contractor for fixed route)	Lytix		About 14 days, depending on how often the vehicle is in revenue service.	Up to 3 years as long as existing storage space permits; indefinitely if preserved for pending litigation.
Mini-bus Vehicles	Safefleet		About 7-21 days, depending on how often the vehicle is in revenue service.	Up to 3 years as long as existing storage space permits; indefinitely if preserved for pending litigation.
Complementary paratransit and mini-bus vehicles	Lytix		About 10 days, depending on how often the vehicle is in revenue service	Up to 3 years as long as existing storage space permits; indefinitely if preserved for pending litigation.
Taxicabs dispatched by MTS' contractor for complementary paratransit and mini-bus service.	Samsara Dash Cams		About 60-100 vehicle hours.	Up to 3 years as long as existing storage space permits; indefinitely if preserved for pending litigation.

Location of Video System	Video System	Minimum Legally Required Retention	Current Retention Capability for Un-Marked Video Recordings	Current Retention Period, if Marked and Saved to Network
Trolley Vehicles	MobileView, owned by Safefleet	1 year, <i>unless</i> technology to store recorded data for 1 year in an economically and technologically feasible manner is not available. (See feasibility analysis in Section IX) <i>See Pub. Util. Code 99164</i>	About 10 days, depending on how often vehicle ignition is on.	Indefinitely if preserved for pending litigation.
Non-Revenue Vehicles (some in-house MTS vehicles) Effective July 1, 2025, these cameras will be phased out as appropriate and replaced with Motive Technologies	Safefleet		About 180 vehicle operating hours.	Up to 3 years as long as existing storage space permits; indefinitely if preserved for pending litigation.
Non-Revenue Vehicles (for MTS' contractor for fixed route bus)	Lytx		About 50 hours for the interior view and about 50 hours for the exterior view.	Up to 3 years as long as existing storage space permits; indefinitely if preserved for pending litigation.
Non-Revenue Vehicles (for MTS' contractor for complementary paratransit and mini-bus service operated vehicles)	Lytx		About 10 days, depending on how often the vehicle is in revenue service	Up to 3 years as long as existing storage space permits; indefinitely if preserved for pending litigation.
Non-Revenue Vehicles (for in-house MTS vehicles)	Motive Technologies		About 85-100 vehicle operating hours	Up to 3 years as long as existing storage space permits; indefinitely if preserved for pending litigation.

Location of Video System	Video System	Minimum Legally Required Retention	Current Retention Capability for Un-Marked Video Recordings	Current Retention Period, if Marked and Saved to Network
Facilities	Avigilon		Range of about 15-60 days. Storage capacity depends on individual camera/location.	Up to 3 years as long as existing storage space permits; indefinitely if preserved for pending litigation.
Body Worn Camera (BWC)	Axon	60 days for non-evidentiary data; 2 years for evidentiary data relating to incidents of force or detention or if relevant to a complaint against Security.	Prior to 12/14/2021: about 60 days* Video recorded 12/14/2021 to present: 2 years. *MTS cannot reasonably separate which BWC video recordings relate to non-evidentiary data and evidentiary data. Effective 12/14/2021, MTS implemented a new system that expanded video BWC storage capabilities to 2 years.	Indefinitely if preserved for pending litigation.
	Visiologix	<i>See Penal Code Section 832.18</i> (This statute only applies to law enforcement agencies, but MTS aims to meet these requirements).		

X. Record Request for Video System Recordings:

Pursuant to the California Public Records Act (CPRA), video recordings relating to the conduct of the public's business prepared, owned, used or retained by MTS may be public records subject to disclosure unless they fall within an exemption.

MTS advises requestors to submit requests as soon as reasonably practicable to the Office of General Counsel. Video Systems have limited retention periods (as discussed above) before the video recording may become unavailable.

The requester should specify the records to be inspected/copied with sufficient detail to enable MTS to identify the particular records. If the request seems ambiguous or unfocused, MTS staff will make a reasonable effort to obtain additional clarifying information from the requester that will help identify the record or records. In order to protect public safety and passenger privacy, video requests must specify a specific MTS operations related incident, or a crime that took place on MTS property or within view of an MTS camera that the video sought may have captured. This specificity is necessary to (a) ensure that MTS staff has enough information to locate responsive video and preserve the relevant portions for production; and (b) avoid MTS video from being used to harass, stalk, or surveil MTS passengers or staff.

The CPRA provides various, limited exemptions from general disclosure requirements. As it relates to video, the most common exemptions would be records involving a pending law enforcement investigation; personnel or medical file that if disclosed would constitute an unwarranted invasion of personal privacy; sensitive security information (SSI) or information about security, operations, facilities, or other critical infrastructure that disclosure would be detrimental to the security of MTS employees, customers or infrastructure; does not relate to MTS's conduct in the provision of offering public transportation services and would constitute an unwarranted invasion of personal privacy; if the public interest in withholding records clearly outweighs the public interest in disclosure; and as otherwise deemed appropriate by law.

Any request for video recordings may be subject to review by legal counsel, prior to any inspection of the records or delivery of copies. The requests will also be logged by the Office of General Counsel.

Although most third-party requests for video are routed through the Office of General Counsel for response, the following requests may be handled directly by the Transit Security and Passenger Safety Department (MTS Security) and Contract Operations.

1. Law Enforcement Investigations. MTS Security and MTS operating divisions work directly with local law enforcement to respond to, investigate, and prosecute crimes that occur on or near MTS facilities or against MTS employees or passengers. As part of that process, MTS or contract staff may directly provide MTS video to investigating officers. Contractors are required to notify MTS staff prior to releasing video and must obtain police department and officer contact information. All information must be appropriately documented.
2. Live Feed Access MOUs. For certain properties or stations where MTS operations or facilities may come under another agency's or entity's control or responsibility, MTS may provide access to the real-time camera feed (where this feature is available) of the Facility Video System. This may include local law enforcement who are charged with responding to an incident on the MTS property, a neighboring property with special security concerns (e.g., Courthouse Station video feed access provided to Courthouse security officials), and joint development properties including shared parking arrangements. Requests for video recordings would still be routed through MTS Security or the Office of General Counsel, as applicable.