From:	Mishaan, Jessica
To:	115351-41299230@requests.muckrock.com
Subject:	FW: Vermont Public Records Act Request: Geolocation data providers (Office of the Attorney General - Vermont)
Date:	Monday, July 12, 2021 8:35:11 AM

Good Morning Ms. Lipton,

Thank you for your public records request received on July 9, 2021 (not July 7 as stated in your follow-up mail). Please note that the Attorney General's Office does not contract with any geolocation data providers. Other state agencies might contract with them and I am happy to discuss that with you further. Might I reach you by phone? If so, please provide me with a number and time to reach you.

Best,

Jessica Mishaan | Paralegal
Office of the Attorney General | General Counsel and Administrative Law Division
109 State Street Montpelier, VT 05609-1001
p (802) 828-5500
Pronouns: she/her/hers

From: 115351-41299230@requests.muckrock.com <115351-41299230@requests.muckrock.com>
Sent: Monday, July 12, 2021 5:01 AM
To: AGO - Info <AGO.Info@vermont.gov>
Subject: RE: Vermont Public Records Act Request: Geolocation data providers (Office of the Attorney General - Vermont)

EXTERNAL SENDER: Do not open attachments or click on links unless you recognize and trust the sender.

Office of the Attorney General - Vermont
PRA Office
109 State Street
Montpelier, VT 05609-1001

July 12, 2021

This is a follow up to a previous request:

To Whom It May Concern:

I wanted to follow up on the following Vermont Public Records Act request, copied below, and originally submitted on July 7, 2021. Please let me know when I can expect to receive a response.

Thanks for your help, and let me know if further clarification is needed.

View request history, upload responsive documents, and report problems here:

Filed via MuckRock.com
E-mail (Preferred): 115351-41299230@requests.muckrock.com

For mailed responses, please address (see note):
MuckRock News
DEPT MR 115351
411A Highland Ave
Somerville, MA 02144-2516

PLEASE NOTE: This request was filed by a MuckRock staff reporter. Also note that
improperly addressed (i.e., with the requester's name rather than "MuckRock News" and the
department number) requests might be returned as undeliverable.

On July 7, 2021:
Subject: Vermont Public Records Act Request: Geolocation data providers (Office of the
Attorney General - Vermont)
To Whom It May Concern:

The Electronic Frontier Foundation (EFF) seeks records describing the relationship between
your agency and third-party providers of geolocation data. In particular, we seek records
related to:
• the location data provider Gravy Analytics and its subsidiary Venntel
• Babel Street's service Locate X.

For the purposes of this request, the term "geolocation data" refers to GPS data acquired from
cell phone apps, connected vehicles, or other connected devices, or from third-party
aggregators of such data, which pertains to the location of individual persons or devices,
whether identified or de-identified.

We request the following records for the period between January 1, 2015 and the present:

- All contracts or written agreements between Office of the Attorney General - Vermont, or
consultants thereof, and Gravy Analytics, Venntel, or Babel Street;
- All presentations, marketing materials, or proposals by contractors, subcontractors, or
consultants working with Office of the Attorney General - Vermont relating to the use of
geolocation data from Gravy Analytics, Venntel, or Babel Street;
- All technical documentation, guides, presentations, or policies describing access to, storage
of, or use of geolocation data acquired from Gravy Analytics, Venntel, or Babel Street;
- All privacy policies, memoranda of understanding, data-sharing agreements, or terms of use
applying to geolocation data acquired from Gravy Analytics, Venntel, or Babel Street;
- All written communications, emails, and attachments between Office of the Attorney

General - Vermont and Gravy Analytics, Venntel, or Babel Street;
- All written communications, emails, and attachments between Office of the Attorney
General - Vermont and INRIX.

If your office or agency contracts with a company not named here for geolocation data,
provision of the alternate organization and equivalent responsive materials would be greatly
appreciated.

The requested documents will be made available to the general public. This request is being
made in the public interest and is not being made for commercial purposes.

In the event that there are fees, I would be grateful if you would inform me of the total charges
in advance of fulfilling my request. I would prefer the request filled electronically, by e-mail
attachment if available or CD-ROM if not.

Sincerely,

Beryl Lipton
Investigative Researcher, Electronic Frontier Foundation
beryl.lipton@eff.org

View request history, upload responsive documents, and report problems here:
https://accounts.muckrock.com/accounts/login/?
next=https%3A%2F%2Fwww.muckrock.com%2Faccounts%2Flogin%2F%3Fnext%3D%252
Faccounts%252Fagency_login%252Foffice-attorney-general-4027%252Fgeolocation-data-
providers-office-of-the-attorney-general-vermont-
115351%252F%253Femail%253Dago.info%252540vermont.gov&url_auth_token=AAAKG
X2t6m1rC94x4raw_Tbqkqo%3A1m2roS%3Akjr727Fz_zC9YbE1yZGOcDYwUrc

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