Statement to the Federal Trade Commission Workshop on "RFID: Applications and Implications for Consumers"

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Stapleton-Gray & Associates, Inc. believes that radio-frequency identification (RFID) merits study as a technology readily applicable to surveillance, with significant potential consequences to personal privacy. Together with the RAND Corporation and Carnegie Mellon University, we are undertaking the "Sorting Door" project in an effort to render these technologies more amenable to research investigation, and public understanding.

A description of the project and its proposed scope is provided at: http://www.sortingdoor.com

The project will assess how those bearing or wearing RFID tags or comparable RF-emitting devices (such as cellphones or contactless-payment devices) might be made targets of surveillance; what might inferred about them through analysis of RFID-derived data; and the consequences for personal privacy. The project uses a Door as a metaphor for likely future scenarios: the RFID tags envisioned as labeling the world as an "Internet of things" are simple, cheap, and read at limited range, but could be readily interrogated in situations individuals find themselves in continually, passing through doorways and similar constrained spaces.

The Sorting Door Network will be a technology testbed — an arena in which to pit technologies, both of surveillance, and of privacy, against one another, to emerge with a better appreciation of RFID's utility as a technology for surveillance. That will in turn inform policymaking, and guide individuals and advocacy groups in their negotiations over the use of RFID by retailers, manufacturers, the government, and others, to ensure that such use not overly compromise privacy.

The Sorting Door Network will welcome participation by other researchers and educators, and is intended to afford both groups access to the collective experience and expertise of many others pursuing similar work. Another significant goal is to explore just how such technologies of surveillance can be studied, given human subjects research constraints: while commercial firms can experiment with these technologies surreptitiously (as some have), academic research is necessarily more constrained.

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