

In 2014, the Franchise and Concession Review Committee approved a public communications structure franchise for CityBridge, LLC (“CityBridge”). The agreement the City of New York (“City”) entered into with CityBridge allows it to install the LinkNYC kiosks on the City’s right-of-way as part of providing free Wi-Fi and other free services to New Yorkers while generating revenue for the City.

In 2021, as part of its franchise administration oversight, the New York City Office of Technology and Innovation (“OTI”), formerly the New York City Department of Information Technology, engaged the consultancy firm KPMG to evaluate CityBridge’s compliance with its public communications structure franchise agreement, with particular attention to the franchisee’s compliance with provisions requiring the protection of Wi-Fi users’ personal identifying information. KPMG’s evaluation was primarily conducted from July 2021 through December 2021 and included the examination of documents and interviews with CityBridge and other LinkNYC system subcontractors. The report was substantially completed in December 2021 and the final report was issued to OTI on March 1, 2022.

The results indicated that CityBridge appeared to have largely complied with the terms of the privacy provisions of the franchise agreement. Additionally, there was no evidence found to suggest either inappropriate collection or usage of Personal Identifiable Information (PII) or that CityBridge shared PII with third parties and/or law enforcement beyond what is permitted by the Franchise Agreement. KPMG identified some areas for improvement. Those findings, along with recommended remediations, are detailed in the report.

OTI notes that CityBridge is permitted to collect data, subject to the franchise agreement and privacy policy, but the extent to which CityBridge actually collects certain data was not the focus of this review. Throughout the assessment, CityBridge was responsive to audit requests.

Due to the age of the audit and other factors, the report may not represent the current state of CityBridge’s program. In December 2022, OTI requested that CityBridge provide a supplemental submission regarding CityBridge’s remediation of the privacy findings. CityBridge’s remediation responses have not been verified by KPMG or the City. The privacy assessment, found [here](#), is partially redacted in a manner consistent with protections provided under the law, including exceptions to the New York State Freedom of Information Law. CityBridge’s supplemental response is found [here](#).

Privacy remains a high priority for the City. OTI will continue to evaluate next steps with regard to future reviews of CityBridge’s compliance with the franchise agreement and privacy protection.