



Position: ATMIA^{1[1]} opposes federal or state legislation mandating video surveillance cameras at all ATMs.

Video surveillance in public places is common in major cities of the world and has been around at least since a system was introduced at a London Transport train station in 1961. While being supportive of video and camera surveillance technology in principle as a crime-fighting tool, ATMIA and its Government Relations Committee are against mandating the installation of such technology at ATMs.

ATM surveillance cameras have traditionally been used by financial institutions to take photographs (snap shots) of ATM customers while they are doing a transaction at the ATM. The photographs are then archived for a period of time in order to be able to verify the identity of the cardholder in the event of a disputed transaction. And some ATM deployers have indeed taken strategic and business decisions to install video surveillance cameras at ATMs they own or operate.

ATMIA stands behind the right of ATM owners and operators to employ free choice in their selection of security solutions. However, attempts to mandate the use of surveillance equipment at ATMs are likely to prove counter-productive for the industry.

The ATM today is deployed in many different environments, from 'through-the-wall' drive-up and walk-up kiosks to indoor 'stand-alone' ATM terminals in retail merchant locations. For indoor stand-alone ATMs, camera surveillance would be redundant in the majority of cases, since most businesses already have CCTV security systems monitoring their premises. Mandating the installation of this technology in these cases would constitute an undue and unnecessary burden on the ATM owner.

An important reason why video surveillance should not be mandatory at ATMs is that ATM locations vary considerably, as do the average transactions per machine at these different locations. The costs of deploying and maintaining surveillance technology would render a large number of ATMs economically unviable, leading to many ATMs being withdrawn from service. This would adversely affect the immediate business and retail environments in those locations which benefit from the increased expenditure and availability of cash afforded by the presence of ATMs in the vicinity. It would diminish the convenience factor for millions of cardholders who see it as their right to have access to their banked cash near to where they live, work and shop.

Another practical matter is, as always, the cost and manageability of enforcing additional laws. The rationale for any legislation must weigh the cost-to-benefit impact on law enforcement. Collecting, retrieving, reviewing and storing images for future use as evidence in criminal actions or fraud resolution can be a daunting and costly task.

ATM owners carry certain liabilities in terms of providing safe environments for ATM usage by customers and it is the opinion of the ATM Industry Association that any further legislation affecting outdoor ATM terminals would be unnecessary given that courts are already empowered to decide on liability issues arising from ATM security. In addition, ATMIA and its Global ATM Security Alliance have produced international physical security best practices for both Stand-Alone and Through-the-Wall ATMs to ensure

^{1[1]} The ATM Industry Association is a non-profit trade association serving all businesses and groups in the ATM industry. The association is made up of several hundred members in more than 30 countries. We currently represent over one million ATMs internationally. For more information go to – www.atmia.com and www.globalasa.com.

safe environments for ATM use. We are working proactively with the banking community and law enforcement to educate ATM owners and cardholders on effective methods of crime prevention and public safety. Since the risk profile of different ATM sites varies significantly, and changes dynamically over time, it should be left to ATM security specialists and ATM owners to remain in control of their security strategies and security technology in our mature industry with its extraordinary track record of service over more than three decades.