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June 9, 2023  
VIA EMAIL ONLY

Randy Ravitz, General Counsel  
POST Commission  
100 Cambridge Street  
Boston, MA 02114

Re: New POST Requirement to Provide Personal Contact Information

Dear Randy:

We represent the New England Police Benevolent Association (NEPBA), which serves as the collective bargaining representative for thousands of police officers in bargaining units across the Commonwealth. We are following up on our phone discussion this afternoon, and our email communications with you and Director of Police Certification, Steven Smith, earlier today. Thanks for taking the time to go through this important issue with us.

As you and I discussed at length, our membership is extremely concerned about the recent directive from POST, advising agencies and officers that they must input personal contact information into the officer portal. Obviously, the home addresses of law enforcement officers are specifically exempt from public disclosure, and for very good reasons. Based on the dangerous and often unwelcome service performed by police officers, our members, their peers and their families are particularly susceptible to retaliation. The publication of their personal contact information – whether intentionally or by accident—could very easily put the safety and security of these folks at great risk. Publication of personal email addresses provides further potential for hacking and harassment. This danger, coupled with the accepted reality that any database connected to the internet can be hacked, causes grave concern within our membership that they or their loved ones will be subjected to irreparable harm.<sup>1</sup>

At this point, I want to clarify what is required of our membership (based on our phone discussion) and to also request that POST act to further refine its new rule in a way that is as

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<sup>1</sup> For instance, the City of Lowell's main server was recently breached, and the City is being extorted to pay millions of dollars in order to prevent the release of confidential personnel information. Some of such information has apparently already been released onto the dark web. The idea that POST will create a single database containing the personal contact information for all police offices in the state is frightening to our membership and their families.

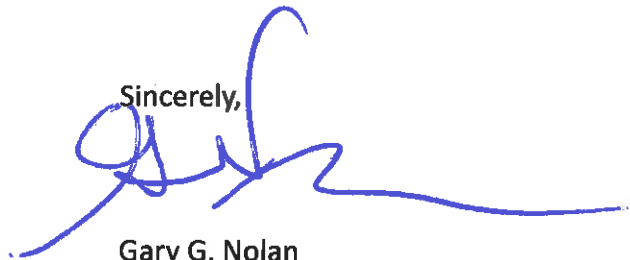


limited as possible, in order to protect our members, while at the same time addressing POST's interest of assuring timely communication. Based on my communication with you, members can be assured that home addresses DO NOT need to be provided. They have the option of providing either a personal email address or a physical address. The physical address can be any address, and need not be a home address (i.e. an officer can provide a union address, a lawyers address, etc.). In the event an officer opts to provide an email address (as opposed to a physical address), it need not be an email address currently being used, but instead officers can choose to simply create a new email address and provide it (i.e., a non-descript, generic "gmail" address). This, of course, presents the problem to the Officer who understandably may not check a new address (that they have obtained to maintain privacy) with the same frequency as a "regular" personal email.

You indicated that POST's primary concern is the ability to give notice to those officers that may be on leave or have separated from their agency. In our view, this concern can be addressed by allowing officers who have access to work email to continue to provide their work addresses and limiting any new requirement to those officers who no longer can be reached via work email/address. Accordingly, we think it would be reasonable to adopt a policy requiring officers who no longer have access to work email to provide either a mailing address or a personal email address to which notice could be sent. In this regard, a requirement could be introduced that calls for officers who become separated from their work email to provide alternative information upon a change in status (similar to requirements that require various types of licensees to update contact information upon moving, etc.). We sincerely hope the Board considers this modest amendment in light of the significant concerns and risks raised by the current requirement.

You indicated that the Commission will be discussing this matter in its upcoming meeting scheduled for next Thursday, June 15<sup>th</sup>, and that it is possible the rule may be amended further. We ask that you bring forward the concerns set forth by our NEPBA membership so that they can be considered by the Commission.

Sincerely,

A handwritten signature in blue ink, appearing to be 'Gary G. Nolan', with a long horizontal flourish extending to the right.

Gary G. Nolan  
Peter J. Perroni

GGN/gal