NO. 448521-1-II

IN DIVISION II OF THE COURT OF APPEALS OF THE STATE OF WASHINGTON

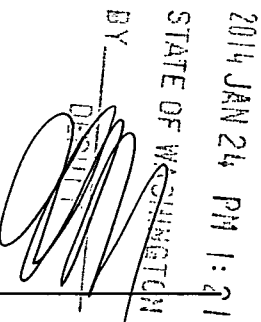
GLENDA NISSEN,

Appellant

v.

PIERCE COUNTY ET AL.,

Respondent



BRIEF OF AMICUS SUBMITTED ON BEHALF OF THE WASHINGTON STATE ASSOCIATION OF MUNICIPAL ATTORNEYS

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TABLES OF CONTENTS

TABLE OF AUTHORITIES

CASES **Page(s)**

STATUTES **Page(s)**

I. INTRODUCTION

A private business's surveillance video might be of great interest to the public, particularly if, for example, that video captured a city public works crew misbehaving while being paid to work on a street repair project. But the public's interest alone does not make that video a "public record" subject to the Public Records Act (PRA).

The surveillance video would still not qualify as a public record if the business was owned by the spouse of city employee. The business owner could upload a portion of that day's video onto a laptop and share it with his spouse after dinner one night without transforming the video into a public record. Even if the city employee happened to take that laptop to work the next day, the video in the computer on the employee's desk would remain outside of the light of the PRA.

This would change if, however, the city employee burned the video on her laptop onto a disc and gave it to the director of public works. Once the director reviews and considers the video to determine if discipline was warranted, public works director has "used" the surveillance video, making it relate to the conduct of government. But even at that point, the remainder of the surveillance video that was not recorded on the disc remains private.

This hypothetical demonstrates several legal issues regarding the application of the PRA to this case, and in particular to personal cell phone bills of employees who use their personal phones to make agency calls.[1]

First, the PRA only applies to public records. Thus, the requestor must prove a personal cell phone bill is a public record before any of the rules of the PRA, including its liberal interpretation mandate, apply.

Second, a plaintiff cannot meet this burden simply by showing that a record was prepared, owned, used or retained by a public employee. If the employee only prepared, owned, used or retained the personal cell phone bill when acting in a personal capacity, the bill is not the agency's public record.

Third, the content of a record does not automatically make the record "relate to the conduct of government." If the agency has not in any way used an employee's personal cell phone bill, that fact that the bill may reflected agency action does not make it a public record.

Fourth, if the employee elects to give a copy of a personal cell phone bill to the agency, the agency can only own, use or retain the phone bill in the form the employee intends to give. If the employee only intends to give the agency a redacted copy, there is no basis for saying the unredacted copy is also a public record.

[1] The term "cell phone" is used to include any personal mobile devise used for phone calls.

Finally, stretching the reach of the PRA to include the personal cell phone bill simply because the employee has volunteered to use a personal resource to benefit the agency would violate that employee's privacy and thus will discourage employees for using their personal phones. This would result in a loss of savings to the taxpayer, without brining any real increase in public accountability. The PRA is designed to help taxpayers control how tax dollars are spent, so interpreting the law to force wasteful increases in taxpayer costs is contrary to its intent.

II. SUMMARY OF INTERESTS AND IDENTITY OF AMICI[2]

The members of the Washington State Association of municipal Attorneys (WSAMA) are the attorneys who represent most of the cities and towns in this state and help their clients with PRA compliance.

III. SPECIFIC ISSUE ADDRESSED[3]

This Amicus brief only addresses one issue: when, if ever, does a public employee's personal cell phone bill become a public record subject to the PRA?

To address this issue, this brief assumes that the public employee has used a personal cell phone to make calls related to agency business

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[2] Additional details about Amicus, its interest in this case, why the Court should hear from Amicus and the familiarly of the applicant with the issues in this case are described in the Motion to File Brief of Amicus.

[3] Although this brief is limited to only one aspect of one of the issues before the Court, this should not be interpreted as disagreement with the County's other positions.

during business hours. It also assumes that the agency's policy allows the employee to use this personal cell phone for agency calls, but the agency does not provide a stipend or reimbursement for those calls.

Under these facts, this brief explains why neither the letter of the PRA, nor the policy of the PRA support finding that the personal cell phone bills are "public records" as defined in RCW 42.56.010.

IV. STATEMENT OF THE CASE

The brief only analyzes part of the factual scenario regarding whether an employee's personal cell phone bill is a public record.

V. ARGUMENT

The PRA only applies to requests for identifiable "public records" made pursuant to the PRA. This is a threshold determination that must be addressed any requirement of the PRA even applies.

The definition of "public record" has three elements: "Public record" "includes any [1] writing [2] containing information relating to the conduct of government or the performance of any governmental or proprietary function [3(a)] prepared, [3(b)] owned, [3(c)] used, or [3(d)] retained by any state or local agency regardless of physical form or characteristics." RCW 42.56.010(3).

Under most circumstances, including those at issue in this case, a personal cell phone bill does not meet the definition of "public record"

because it does not relate to the conduct of government and it has not been prepared, owned, used or retained by an agency.

A. The Initial Burden Is on a Plaintiff/Requestor to Establish that the Requestor Made a Request for an Identifiable Public Record Pursuant to the PRA

The PRA only applies to "public records," and agencies are only required to comply with the rules of the PRA if a requestor has made a request for identifiable public records pursuant to the PRA. *Beal v. City of Seattle*, 150 Wn. App. 865, 872, 209 P.3d 872 (2009).

If the requestor has made a request for records that are not "public records," then none of the rules and requirements of the PRA apply. *City of Federal Way v. Koenig*, 167 Wn.2d 341, 348 n.4, 217 P.3d 1172 (2009). Likewise, if the requestor has not requested "identifiable" public records, then the PRA does not apply. *Bonamy v. City of Seattle*, 92 Wn. App. 403, 409, 960 P.3d 447 (1998). Finally, if the requestor has not provided the agency with "fair notice" that the request is being made pursuant to the PRA, then the PRA does not apply. *Beal*, 150 Wn. App. at 873.

The plaintiff, as the party bringing the lawsuit, has the burden of establishing these three elements. *Spokane Research & Defense Fund v. City of Spokane*, 155 Wn.2d 89, 117 P.3d 1117 (2005) (PRA lawsuits governed by same rules as any civil lawsuit except where PRA explicitly provided otherwise). If these threshold elements are not proven, the

liberal interpretation rules of the PRA do not come into effect. *See Koenig*, 167 Wn.2d at 348 n.4. Moreover, the PRA only shifts the burden to an agency to justify an exemption; thus the burden otherwise remains on the plaintiff. See RCW 42.56.550.

B. Actions Taken by Public Employees and Elected Officials in Their Personal Capacity Are Not Actions Taken by the Agency

Records prepared, owned, used or retained by a public employee are not automatically "public records," even if the content of those records refers to agency business. This is obvious from a logical point of view but is also well established in law.

For example, if an employee were to write in a personal journal or posting on Facebook at night before bed about a particularly difficult discipline issue at work, the subject matter of the entry – official actions by a public agency – does not turn the personal journal or Facebook post into a "public record." This is because the entry or post is prepared by the employee in the employee's personal persona, and is thus not prepared, owned, used or retained by the agency.

This distinction has been recognized in slightly different factual circumstances. Thus, in *Diaz v. Wash. State Migrant Council*, 165 Wn. App. 59, 265 P.3d 956 (2011), a central issue was whether the plaintiff and the directors of the defendant non-profit corporation were within the

U.S. legally. Nevertheless, the appellate court ruled that the defendant was not required to produce the directors' immigration papers because those papers were held by the directors in their personal capacity. Therefore, the court found, those records were not in the "control"[4] of the defendant. *Diaz*, 165 Wn. App. at 77-78.

The distinction between an employee's personal persona and work persona was also recognized in a PRA case by the Supreme Court in *Cornu-Labat v. Hosp. Dist. No. 2*, 177 Wn.2d 221, 240, 298 P.3d 741 (2013). As one of its defenses, an agency argued that the requestor, who was an employee, had signed an agreement not to make PRA requests. In rejecting that defense, the Supreme Court adopted the trial court's reason that "it is not Gaston Cornu-Labat the [agency] employee who makes the request for public records. Rather it is Gaston Cornu-Labat the citizen who makes it." *Cornu-Labat*, 177 Wn.2d at 240. In other words, even if his employee persona was bound by the rule, his personal persona was not.

These two cases simply confirm what is common sense – only actions taken by public employees acting in their official capacity can be treated as actions of the agency.

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[4] Although the scope of records within a litigant's "control" as defined by the civil discovery rules can differ from the scope of records that will be considered to be an agency's "public records," the *Diaz* Court's analysis of the distinction between records held by the employee persona and record held in the personal persona is applicable to a PRA analysis.

This distinction does not disappear when the employee is an elected official. In fact, it could be said the elected official also has a third persona – a campaign persona. The distinction between an elected official's employee persona and campaign persona is implicit in the very fabric of the original Public Disclosure Act, which included both the public records laws and the campaign finance laws. Under the public disclosure law, currently codified at RCW 42.17A.555, public agencies are prohibited from using public resources to support a political candidate. If an elected official such as an elected prosecutor, was treated as the agency, then the official could not do anything to support his own campaign without using agency resources. That would lead to the absurd result that every official who has campaigned for re-election has been violating the law.

Therefore, when looking at the issue of whether personal cell phone bills are "prepared, owned, used or retained" by the agency, it is not enough to simply say "*an employee prepared (or used or retained or owned) the record and therefore it the agency's public record.*" Rather the Court must look at whether the employee was acting in his or her personal capacity or employee capacity (or for elected official political capacity) when a particular record is prepared, owned, used or retained.

C. An Employee's Personal Cell Phone Bill Is Not Prepared, Owned or Retained by an Agency Unless the Employee Voluntarily Transfers It to the Agency

Whether an agency has prepared, or owned or retained a writing is usually easy to determine. If the record is currently in the possession of the agency, it is at least retained by the agency. If the record originated at the agency, it was prepared by the agency. Finally, if neither of these first two conditions apply, but by matter of contract, substantive law or otherwise, the agency had legal ownership of the records, then the agency "owns" these records.

Here, the personal cell phone bills are prepared by a mobile phone service provider. They are sent to the public employee in his personal capacity for payment from his person funds. These bills are thus owned and (maybe) retained in the employee's personal capacity. This would remain true, even if the employee brought the bill to work and wrote a personal check to pay the bill during a break. The agency simply has no right to access this record without the employee's consent.

If an employee gives a copy of the bill to the agency for reimbursement or some other reason, that bill only becomes a public record in the form that the employee intends to legally transfer to the agency. Thus, if the employee only intends to give a redacted copy of the phone bill to the agency, then that is the only version of the record that

becomes a public record, and the agency will not have to justify those pre-made redactions. This would be true whether the employee did the redactions himself, or he gives the bills to the agency with the understanding that the agency will do the redactions. The agency only obtains a right to the record once those redactions are made. This conclusion is mandated by common sense, fairness, public policy and *Forbes v. City of Gold Bar*, 171 Wn. App. 857, 288 P.3e 384 (2012).

In *Forbes*, Gold Bar's mayor had been using her personal email account for both personal emails and city business. When her city emails were requested, the mayor voluntarily agreed to allow the City access to her emails on the condition that the city only turn over emails related to city business. The Court held that under these facts, the emails not about city business were not public records and did not need to be added to an exception log, even though the city possessed all of the mayor's emails and a city employee sorted them. *Forbes*, 171 Wn. App. at 867-68.

This is analogous to the litigant who appears in a lawsuit to file a motion dismiss for lack of personal jurisdiction. Just as a court would recognize that this appearance and request for court action was not consent to the court's jurisdiction, an employee's action of giving a record to an agency to determine whether the record is a public record cannot be

treated as automatically turning that record in to a public record based on this review.

This same reasoning applies in this case, where the prosecutor only gave his records to the County on the condition that certain redactions were made. If a requestor could get to personal information and records as is suggested by appellant, it would have the consequence of discouraging public employees from cooperating with agencies, thus leading to the public having less access to records and information.

D. An Employee's Personal Cell Phone Bill Is Not Used by the Agency & Does Not Relate to the Conduct of the Agency

While "used" and "relating to the conduct of government"[5] are two distinct elements in the definition of public record, they are in fact intertwined and cannot be considered separately. This relationship is best explained by the Supreme Court in *Concerned Ratepayers v. Clark County PUD*, 138 Wn.2d. 950, 983 P.2d 635 (1999). As this case illustrates, "used" means used as part of the conduct of government, and "relating to the conduct of government" means the record was used for an official government action. An agency does not "use" every record that one of its employees uses because the employee may be using it in the employee's

[5] The phrase "conduct of an agency" will be used to refer to the second element, whether the writing relates to the "conduct of government or the performance of any governmental or proprietary function."

personal capacity. Likewise, the content of a record is not determinative on whether the record relates to the conduct of government.

This was the issue in *Concerned Rate Payers* – the record considered by the Court was a blueprint for a turbine. On its face, the blueprint was not related to the PUD. But when the Court analyzed whether it was a public record, the Court found it was a public record because PUD employees reviewed and evaluated the blueprint before making an official agency decision not to purchase that turbine. It was this level of use that created a nexus between the record and agency action that made the blueprint a public record – just looking at the record did not amount to "use" or make the record "related to the conduct of government." *Concerned Rate Payers*, 138 Wn.2d at 960-61. (citing *Yacobellis v. City of Bellingham*, 55 Wn. App. 706, 780 P.2d 272 (1989)).

Concerned Rate Payers does not present a unique situation. In *Yocobellis*, the court faced a similar question. There, a municipal golf course had collected salary information from other municipal golf courses that it then used to help the city formulate a bargaining position. The City tried to argue that these were not public records because they related to the conduct at other municipal golf course, not Bellingham's municipal golf course.

In rejecting Bellingham's argument, the court of appeals held that the key factor was "the role the documents played in the system" rather than who had prepared the records. *Yacobellis*, 55 Wn. App.711-12. The court acknowledged that not every record retained by an agency is a "public record," solely because the records were in the city's possession, but here the city used the surveys to inform its bargaining position and thus the surveys related to the city's conduct.

This same analysis was used in *Tiberino v. Spokane County*, 103 Wn. App. 680, 13 P.3d 1104 (2000). The records at issue here were personal emails on a county computer. The issue arose when an employee was terminated for excessive personal email use. The county had reviewed these emails, which led to her termination, and then printed the emails when the terminated employee threatened to sue.

The emails were retained by the agency, but "[t]he content of Ms. Tiberino's e-mails is personal and is unrelated to government operations." *Tiberino*, 103 Wn. App. at 691. Nevertheless, the court determined that the emails did in fact "relate to the conduct of government" because the county used emails as a basis for termination and as evidence in an anticipated lawsuit. *Tiberino*, 103 Wn. App. at 688; *see also Dragonslayer v. State*, 139 Wn. App. 433, 161 P.3d 428 (2007) (remanding for "addition fact findings as to how the [agency] uses these

[financial] statements [of a private business] are necessary to determine whether they are related to the conduct of government.")

These cases demonstrate how the content of a record is not determinative and thus records with content unrelated to government can still be records related to the content of government if there records are used as part of official agency business.

West v. Thurston County, 168 Wn. App. 162, 275 P.3d 1200 (2012) illustrates how content does not control, and even when the content if a record is all about agency actions, it may still not be a public record if the it has not played any role in agency action. In *West*, this Court was analyzing whether attorney fee bills from a law firm defending the county were public records. The content described in these bills were about agency action, but the bills had been sent to the county's insurer, not to the county. No one at the county had ever seen them and the county had no obligation to pay the bills. Thus, they had not been used by the agency so this Court held they were not the county's public records

The key importance of the use of a record in determining whether it relates to the conduct of government can be most graphically illustrated by the hypothetical journal writer of Facebooker . Assume that after writing extensively about the incident at work before going to bed, the public employee decides to bring the journal to work so he can continue to

write during his lunch or use his computer to post on Facebook. That journal, once it is sitting on the employee's desk, or data in the computer's cache,[6] could be said to be "retained" by the agency. But that fact alone does not make it a public record because it has not been used by the employee's agency. Instead, it would only be if, for example, the computer use violated agency policy and the cache of the Facebook post was used as evidence for discipline that the content of the post would become a public record. But even in this scenario, the content is not the relevant factor; rather it is the use. Thus even if the employee in *Tiberino* has included complaints about her boss in her personal emails, that additional content about her job would have been irrelevant.

When "relating to the conduct of government" is interpreted under this "use" analysis, it becomes clear that a public employee's phone bills are not public records simply because the phone itself was used for agency business.

The appellant's only real "hook" for calling the prosecutor's personal phone bills "public records" is that those bills record phone numbers and times for agency-related calls. But the bills are not being

[6] For computing, "cache" is defined as "a fast temporary storage where recently or frequently used information is stored to avoid having to reload it from a slower storage medium." Wiktionary at http://en.wiktionary.org/wiki/cache. Even when an internet browser's "history" is removed, cache images reflecting webpages that have been visited may remain for a limited period of time. Moreover, pieces of cache may remain in a computer harddrive's unallocated space for significantly longer.

used by the agency. The prosecutor may be using the phone itself for agency business, but the phone bill is prepared after the call is complete by a private corporation and is later sent to the employee, in his personal capacity, for payment. At no point does the agency prepare, own, use or retain these bills. Thus, it cannot be said the bills relate to the conduct of the agency.

The appellant argues that the public might be interested in the information in the bills because it will show how the employee spent part of his day, and this interest makes those bills public records. To support this "interest" test, the appellant cites to *Tiberino*. But a closer look at *Tiberino* shows why the public's interest alone is not sufficient to make a record a public record.

First, the appellant has misconstrued the holding in *Tiberino* – the court did not analyze the public interest when determining whether the emails were public records – instead it looked at the use in the discipline process and for litigation to determine if the emails related to the conduct of government. *Tiberino*, 103 Wn. App. at 688. Had the emails not been used for discipline, they would not have related to the conduct of government. The public's interest only became relevant after the court had determined the emails were public records and the court was trying to determine if they were exempt under the employee privacy exemption.

Thus *Tiberino* cannot support appellant's claim that the public's interest in personal phone bills make those phone bills public records. Moreover, if you follow appellant's logic, the relevant information would not be data about calls the employee makes for agency business. Rather it would be data about when the employee is making personal phone calls on agency time.[7]

In sum, it is not sufficient to say personal cell phone bills become public records simply because an employee used the phone to make an agency-related phone call. While the employee may be using the phone itself for agency business, which is hardware, not a record, he is not using the bills, which are prepared by a private phone service provider sometime after the call itself. The private service provider's action of recording the number and length of the call is no different from a private security camera recording the actions of public work employees doing street repairs. The public might be interested in those videos but that does not mean the public has a right to access them. Interest alone does not make something a public record.

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[7] Ironically, even if the phone bills were public records, the public would likely not have a legitimate interest in the limited information in those bills because as shown below, the harm to the public interest that would be caused by disclosing those records would outweigh any benefit. *See Tiberino*, 103 Wn. App. at 690 (holding legitimate public interest is determined by balancing the benefits and the harms disclosure will cause the public).

Nor can it be said that the record is transformed into a public record once the carrier sends the bill to the public employee, because it is sent to the public employee in his personal capacity for payment for personal funds. This still does not change when the bill is brought into work so the employee can write the check when eating lunch at his desk. At no point has the personal phone bill played any role in agency conduct.

E. Mandating Public Disclosure of Personal Cell Phone Bills Would Not Serve the Public Interest

"The purpose of the [PRA] is to keep the public informed so it can control and monitor the government's function. [¶] Generally records of government expenditures for employee salaries ... are of legitimate public interest[.]" *Tiberino*, 103 Wn. App. at 690. Here, the public's "interest" in seeing how long a public employee spends on the phone carrying out agency business is minimal at best and does not substantially further the public's ability to control government. In contrast, the public is benefited by the wiser use of tax dollars that comes from employees using their personal cell phones for agency business, relieving the agency's taxpayers from the cost of supplying cell phones for these employees.[8] That cost savings will not be realized, however, if disclosure is required, because

[8] The Supreme Court's concern about government employees "circumventing" the PRA by the use of personal cell phones can be addressed by prohibiting the use of those phones for texting. The City of Everett has such a rule for all phones, based on the challenges text messages pose for document retention. See City of Everett's Electronic Communication & Technology Resources policy §2.3(G), (excerpt attaches as App. 1).

employees will be a lot less likely to use their own cell phone if the consequence of volunteering their personal cell phone for agency business is a loss of privacy.

It could even ultimately serve to harm public accountability by having a chilling effect on would-be whistleblowers, who might want to disclose public corruption or waste, but choose to stay silent out of fear that their personal cell phone bill might disclose that he was the person who leaked the information to the media.

VI. CONCLUSION

It has long been recognized that the purpose of the PRA is to scrutinize the conduct of government, not the conduct of individuals. When records will help the public trace the use of public resources and tax dollars, the PRA's light shines bright because control of tax dollars is at the heart of the public's ability to control the agencies they have created. The 1972 initiative itself also directs courts to be "mindful of the right to privacy." I-276 (1)(11). Thus, when scrutiny of an employee's personal actions will lead to waste without a comparable or greater public benefit, the policy justifications for turning the PRA light on those employees do not apply. Moreover, even when a record has been retained by an agency, if it has played no role in agency action and thus does not relate to the conduct of the agency, the letter of the PRA does make it a public record.

An employee's personal cell phone bill has not played any role in agency action, even when the phone itself has. Moreover, if employees were required to produce these bills, it would violate their privacy. The end result would be lost savings for taxpayers because the threat of this unnecessary scrutiny would be to discourage the use of personal cell phones, forcing the taxpayers to have to pay to provide these phones. Thus, personal cell phone bills fall outside of both the letter of the PRA and the spirit of the PRA.

RESPECTFULLY SUBMITTED this 24th day of January, 2014.

JIM ILES
City Attorney, City of Everett

By:_____
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CERTIFICATE OF SERVICE

I, Christina Wiersma, certify under penalty of perjury that true and correct copies of the above attached document were delivered as follows, with the parties' agreement to accept email service with hard copies mailed via U.S. mail:

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Executed at Everett, Washington, this 24th day of January, 2014.

Christina Wiersma

Christina Weirsma

Appendix

City of Everett Electronic Communication & Technology Resources Policy

(excerpt)

POLICY/PROCEDURE

TITLE **ELECTRONIC COMMUNICATIONS & TECHNOLOGY RESOURCES**		NUMBER 400-10-01
EFFECTIVE DATE 07/01/10	SUPERCEDES 400-07-01	PAGE NUMBER 1 OF 13

Section Index:

1.0 PURPOSE

1.1 This policy establishes guidelines for the use of City electronic communications, computers, networks and other information technology resources.

1.2 This policy shall apply to all City employees and volunteers as defined herein.

1.3 This policy is initiated by City Administration, the Information Technology Department, and the Human Resources Department.

2.0 POLICY

2.1 The City electronic communications and technology resources are provided for the purpose of conducting City business. City officers and employees are obligated to conserve and protect City electronic communication and technology resources for the benefit of the public interest. Responsibility and accountability for the appropriate use of City electronic communication and technology resources ultimately rest with the individual City officer or employee or with the City officer or employee who authorizes such use.

Improper use of the City's electronic communications and technology resources may result in discipline, up to and including termination.

2.2 City electronic communications and technology resources include computer systems, telecommunications systems, networks, supporting equipment, and services such as e-mail, telephones, cell phones, voice mail, data storage, and Internet use.

2.3 Cellular Telephones

A. Cellular telephones are issued to City staff when their current job justifies receiving or making calls away from their office or work base.

B. The cellular telephone is the responsibility of the employee or group of employees to which it was issued.

C. The cellular telephone is to be used solely by the employee or the group of employees to which it was issued.

D. The cellular telephone is to be used for calls that pertain to the specific job, project, or work assignment for the business of the City of Everett.
   a. Cellular telephones assigned to an employee – Personal cellular telephone call(s) are permitted when appropriate, with the understanding that the total cost of the call(s) will be reimbursed to the City of Everett within 30 days of the employee's receipt of the cellular telephone detail report.
   b. Cellular telephones assigned to a group of employees – Personal cellular telephone calls are strongly discouraged but are permitted when appropriate, with the understanding that the total cost of the call(s) will be reimbursed to the City of Everett within 30 days of the employee's receipt of the cellular telephone detail report.

E. Use of a cellular phone should be limited to instances when a less costly means of communication is not available.

F. Employees are to immediately report the loss of a cellular phone to their manager and to the Telecommunications Division. This will allow the Telecommunications Staff to stop the cellular service for that device in an attempt to prevent unauthorized use and cost to the City.

G. As cell phone text messaging presents a potential records retention requirement, the use of City owned or personal cell phones to send text messages to conduct City business is prohibited without prior approval of the Mayor or the Mayor's designee. Such approval will only be considered when the benefits of texting outweigh the burdens and risks of texting. Any requests for exemption must include a proposed procedure for meeting records retention requirements.

2.4 Smart Phones

A. All Cellular Telephone polices described in Section 2.3 also apply to smart phones.

Issued By: _____
Joe Boland, Information Technology Director

Approved By: _____
Sharon K. DeHaan, Labor Relations/Human Resources Director

Approved By: _____
Debra Bryant, Chief Administrative Assistant – CFO

Approved By: _____
Ray Stephanson, Mayor