



**KEN PAXTON**  
ATTORNEY GENERAL OF TEXAS

June 28, 2019

Ms. Jeri Carter Lawson  
Open Records Coordinator  
City of Dallas  
1500 Marilla 5DS  
Dallas, Texas 75201

OR2019-17863

Dear Ms. Lawson:

You ask whether certain information is subject to required public disclosure under the Public Information Act (the "Act"), chapter 552 of the Government Code. Your request was assigned ID# 772153 (Reference# C001318-021319).

The City of Dallas (the "city") received a request for information pertaining to a specified incident. You state the city released information to the requestor, but made redactions as permitted by section 552.024(c) of the Government Code without requesting a decision from this office. We note the city also redacted the originating telephone number of a 9-1-1 caller pursuant to Open Records Letter No. 2011-17075 (2011).<sup>1</sup> Pursuant to sections 552.024(c-1), the requestor has asked this office to review the information redacted by the city and render a decision as to whether it is excepted from disclosure under section 552.117(a)(1) of the Government Code. We have considered the city's position and reviewed the representative sample of information.<sup>2</sup>

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<sup>1</sup>Open Records Letter No. 2011-17075 authorizes the city to withhold, under section 552.101 of the Government Code in conjunction with section 772.318 of the Health and Safety Code, an originating telephone number of a 9-1-1 caller furnished by a service supplier established in accordance with chapter 772 of the Health and Safety Code without the necessity of requesting a ruling from this office.

<sup>2</sup>We assume that the "representative sample" of records submitted to this office is truly representative of the requested records as a whole. *See* Open Records Decision Nos. 499 (1988), 497 (1988). This open records letter does not reach, and therefore does not authorize the withholding of, any other requested records

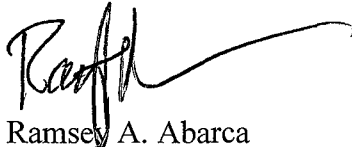
Initially, we note some of the information you redacted is unresponsive to the request at issue. This ruling does not address the public availability of the non-responsive information and the city need not release it to the requestor.

Section 552.136 of the Government Code provides, “[n]otwithstanding any other provision of [the Act], a credit card, debit card, charge card, or access device number that is collected, assembled, or maintained by or for a governmental body is confidential.”<sup>3</sup> Gov’t Code § 552.136(b); *see id.* § 552.136(a) (defining “access device”). We understand the employee identification numbers you marked are used in conjunction with one additional digit to access City of Dallas credit union bank accounts. We therefore conclude the city must continue to withhold the employee identification numbers you previously redacted under section 552.136 of the Government Code.<sup>4</sup>

This letter ruling is limited to the particular information at issue in this request and limited to the facts as presented to us; therefore, this ruling must not be relied upon as a previous determination regarding any other information or any other circumstances.

This ruling triggers important deadlines regarding the rights and responsibilities of the governmental body and of the requestor. For more information concerning those rights and responsibilities, please visit our website at [http://www.texasattorneygeneral.gov/open/orl\\_ruling\\_info.shtml](http://www.texasattorneygeneral.gov/open/orl_ruling_info.shtml), or call the Office of the Attorney General’s Open Government Hotline, toll free, at (877) 673-6839. Questions concerning the allowable charges for providing public information under the Act may be directed to the Office of the Attorney General, toll free, at (888) 672-6787.

Sincerely,



Ramsey A. Abarca  
Assistant Attorney General  
Open Records Division

RAA/be

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to the extent that those records contain substantially different types of information than that submitted to this office.

<sup>3</sup>The Office of the Attorney General will raise a mandatory exception on behalf of a governmental body, but ordinarily will not raise other exceptions. Open Records Decision Nos. 481 (1987), 480 (1987), 470 (1987).

<sup>4</sup>As our ruling is dispositive, we need not address your remaining argument against disclosure of this information.

Ref: ID# 772153

Enc. Submitted documents

c: Requestor  
(w/o enclosures)