



KEN PAXTON
ATTORNEY GENERAL OF TEXAS

December 14, 2022

Mr. Samuel D. Hawk
Counsel for the City of Grapevine
Boyle & Lowry, L.L.P.
4201 Wingren Drive, Suite 108
Irving, Texas 75063-2763

OR2022-38961

Dear Mr. Hawk:

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# 989753.

The City of Grapevine (the "city"), which you represent, received a request for specified audit logs pertaining to body worn camera recordings. You claim the submitted information is excepted from disclosure under section 552.139 of the Government Code.¹ We have considered the exception you claim and reviewed the representative submitted information.²

Section 552.139 of the Government Code provides, in relevant part, the following:

(a) Information is excepted from [required public disclosure] if it is information that relates to computer network security, to restricted information under Section 2059.055 [of the Government Code], or to the design, operation, or defense of a computer network.

(b) The following is confidential:

(1) a computer network vulnerability report;

¹ Although you raise section 552.101 of the Government Code, you make no arguments to support this exception. Therefore, we assume you have withdrawn your claim this section applies to the information at issue. Gov't Code §§ 552.301, .302.

² We assume 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 to the extent those records contain substantially different types of information than that submitted to this office.

(2) any other assessment of the extent to which data processing operations, a computer, a computer program, network, system, or system interface, or software of a governmental body or of a contractor of a governmental body is vulnerable to unauthorized access or harm, including an assessment of the extent to which the governmental body's or contractor's electronically stored information containing sensitive or critical information is vulnerable to alteration, damage, erasure, or inappropriate use;

(3) a photocopy or other copy of an identification badge issued to an official or employee of a governmental body; and

(4) information directly arising from a governmental body's routine efforts to prevent, detect, investigate, or mitigate a computer security incident, including information contained in or derived from an information security log.

Id. § 552.139(a)-(b). You claim the submitted information is subject to section 552.139(b)(4). You indicate the information at issue provides details about the city's network security, including IP addresses, employee usernames, and employee user IDs. Based upon your representations and our review, we find the information at issue relates to computer network security, and the design, operation, or defense of the city's computer network. Accordingly, the city must withhold the IP addresses, employee usernames, and employee user IDs under section 552.139(b) of the Government Code. However, you have failed to demonstrate the applicability of section 552.139 to any of the remaining information. Therefore, the city may not withhold any portion of the remaining information under section 552.139(a) of the Government Code. The remaining information must be released.

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 <https://www.texasattorneygeneral.gov/open-government/members-public/what-expect-after-ruling-issued> or call the OAG's Open Government Hotline, toll free, at (877) 673-6839. Questions concerning the allowable charges for providing public information under the Public Information Act may be directed to the Cost Rules Administrator of the OAG, toll free, at (888) 672-6787.

Sincerely,

Anthony Crabtree
Attorney
Open Records Division

A1C/eb

Ref: ID# 989753

Enc. Submitted documents

c: Requestor
(w/o enclosures)