



December 4, 2018

The Honorable Matthew Hill
The Honorable Christopher Pearson
Co-Chairs, Right to Repair Task Force
Vermont Statehouse
115 State Street
Montpelier, VT 05633-5301

Dear Vermont Right to Repair Task Force Members:

CTIA, the trade association for the wireless communications industry provides this letter as follow up to its testimony regarding the right to repair issue in Vermont. CTIA's members include wireless service providers, infrastructure providers, suppliers and manufacturers.

Legislation as offered to the Task Force, would negatively impact agreements between Original Equipment Manufacturers, (or OEMs) and authorized repair networks, which include businesses of all sizes. These agreements and repair networks would be undermined and provide no protection or quality assurance for consumers.

As we move to a more connected world, there is concern regarding cybersecurity and the Internet of Things. In fact, this summer, CTIA announced the creation of the CTIA Cybersecurity Certification Program for cellular-connected Internet of Things (IoT) devices. This program has been developed in collaboration with the nationwide wireless providers to ensure that devices coming into the marketplace and connected to wireless networks will have cybersecurity features built into them.

By offering certification for IoT devices built from the ground up with cybersecurity in mind, the program will protect consumers and wireless infrastructure, while creating a more secure foundation for smart cities, connected cars, mHealth and other IoT applications. Leading wireless operators, technology companies, security experts and test labs collaborated to develop the program's test requirements and plans. The program builds upon IoT security recommendations from the National Telecommunications and Information Administration (NTIA) and the National Institute of Standards and Technology (NIST).



Having legislation that mandates the sharing to all of important information regarding how equipment operates, specific schematic diagrams and service code descriptions would weaken cybersecurity on devices and potentially harm the security of information on devices and the networks themselves. One must bear in mind that bad-actors, cybercriminals and nation-states are adept at exploiting information and are not bound by rules and laws.

Manufacturers have invested heavily in their brands and have gone to extraordinary lengths to maintain the quality of the device carrying that brand for the first owner and all others for the life of the device. Authorized repair facilities work under contract with many manufacturers and providers to ensure repairs are made properly and safely and meet OEM standards. Their authorization to perform repairs ensures that the changes made to the devices are compatible with current technology and the networks on which they operate. Legislation as contemplated in Vermont would harm the marketplace by weakening the relationship that manufacturers have with authorized repair facilities.

When an electronic product breaks, consumers have a variety of repair options, including using an OEM's authorized repair network, which often include local repair service providers as well as mail-in, and even in-house repair options for some products. Consumers may also choose to use one of many independent repair service providers; although they do so without the quality assurance provided by using a manufacturer's authorized network provider.

Additionally, it is important to note that devices have value even when a consumer no longer wants to use a particular device. Many manufacturers and wireless service providers offer programs in which a consumer can trade in or donate an old device. This provides a way to recycle old, unused devices, eliminating household clutter and protecting the environment. ¹

¹ Information on Trade-In programs can be found on company websites: Verizon: <https://www.verizonwireless.com/support/trade-in-program-faqs/>; AT&T <https://tradein.att.com/#/how-it-works>; T- Mobile: <https://www.t-mobile.com/cell-phone-trade-in.html>; Sprint: <https://secure.sprintbuyback.com/bbt/>; USCellular: <https://www.uscellular.com/trade-in-cell-phones/index.html>; Apple: <https://www.apple.com/iphone/trade-up/> and Samsung: <https://www.samsung.com/us/trade-in/frequently-asked-questions/>



The marketplace already provides a wide range of consumer choice for repair with varying levels of quality, price and convenience without the mandates imposed by state legislation.

Sincerely,

Handwritten signature of Lisa McCabe in cursive script.

Lisa McCabe

Director, State Legislative Affairs
