



To: The Honorable William Botzow, II, Chair, House Committee on Commerce and Economic Development

From: Joe Hoellerer, Manager – Government Relations, Security Industry Association (SIA)

Date: April 17, 2018

Re: Opposition to S. 180 (Pearson), as amended

SIA is a non-profit, international trade association representing over 800 security and life safety solutions providers. Our member companies develop, manufacture, and integrate technologies that help keep people and property safe from fire, theft, and other hazards. Some of these security solutions include video cameras, carbon monoxide detectors, facial recognition software, and advance locking mechanisms, to name a few. SIA represents industry leaders who constantly strive to introduce robust security solutions that keep families safe from nefarious individuals and ensure sensitive areas are secured from unauthorized entry. Due to the advent of interconnected sensors, networks, and ubiquitous smart technologies, use of these systems is growing in homes and businesses around the country.

On behalf of SIA, we must respectfully submit our opposition to S. 180, an act related to right to repair, as amended.

S. 180 was amended to create a *Right to Repair Task Force* comprised of public officials from Vermont's General Assembly and three state agencies. SIA's primary concerns lie with a few provisions noted in Section one of S. 180 as amended; specifically, provisions 1-4.

We understand the intent of this legislation is to study an issue that seeks to provide consumers with the freedom and flexibility to fix everyday consumer electronic devices. However, the aforementioned provisions in Section one conveys an inaccurate portrayal of how electronic equipment manufacturers interact with the repair community. Section one implies that original equipment manufacturers (OEM) prefer to ostracize the repair community by refusing to relinquish certain repair, diagnostic, and proprietary source code information upon request.

Our membership prides itself on manufacturing and deploying technologically-advanced security solutions while providing consumers and end-users with multiple reparation options outside of the OEM. In order to remain competitive in the security industry, companies understand it is imperative to certify authorized repair providers so customers receive flexibility when reparations are needed. SIA companies have certified multiple authorized repair providers and as a common business practice, OEMs certify repair providers through rigorous training to ensure

these authorized partners are well-trained, knowledgeable, and qualified to meet the standards set forth by the OEM. A multitude of our members have made significant investments in R&D initiatives, so in the end, our organization feels it is prudent to ensure those investments are not jeopardized by placing electronic products and proprietary software into the hands of untrained individuals whom are not certified by the OEM.

Furthermore, cybersecurity tools and processes such as embedded software, security patches, and encrypted firmware play an integral role in effective cyber hygiene. If these tools are improperly used and maintained, the cyber security of electronic equipment connected to an IP network could be compromised.

While “right to repair” appears well-intentioned, there are several unintended consequences that will adversely impact the security industry and its loyal customers if S. 180 continues to paint a negative picture on the relationship between the OEM and repair community. Before the General Assembly creates another taxpayer funded task force, the task force members should receive an objective and unbiased overview on how right to repair impacts Vermonters.

Thank you for your time and attention to this issue. Please let us know if SIA or its members can provide information or any other further assistance to you and your colleagues in the legislature.

cc: House Committee on Commerce and Economic Development

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