



**New England Cable & Telecommunications Association, Inc.**  
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*New England Cable & Telecommunications Association, Inc.*

April 7, 2017

House Committee on Commerce and Economic Development,

The New England Cable & Telecommunications Association (NECTA) is a five state regional trade association representing substantially all private cable telecommunications companies in Vermont, Connecticut, Massachusetts, New Hampshire and Rhode Island. For more than four decades, NECTA has represented the interest of the cable telecommunications industry before state and federal regulatory agencies, in the Courts, the Legislatures and before the Congress of the United States.

NECTA members bring significant economic benefit to Vermont's economy. Major Vermont cable companies support more than 900 jobs statewide and generate \$210.8 million in economic activity annually.

NECTA opposes H.467. Our members respect and protect customers' personal data and that commitment is reflected in the privacy statements from each cable company, which are available online. However, H.467 is incredibly broad in scope and would create a new undue burden of regulation on companies operating in Vermont.


First and foremost, the Federal Trade Commission (FTC) already has a well defined standard for "data broker". However, the definition of "data broker" in H.467 as introduced does not match the federal definition. The definition of "data broker" included in the bill is extremely broad and it is not clear from our read of the language exactly which entities the legislation intends to regulate and which would be excluded.

Furthermore, it is unclear what exactly this bill is trying to accomplish. Virtually every aspect of commerce today is dominated by the collection and use of data, the overwhelming majority of which is publicly accessible. Requiring a broad array of entities that utilize this data will rope in many companies that use data in a way that has no negative impact to consumers. There are many positive uses of data in today's society and that the intent behind this legislation does not acknowledge.

Finally, H.467 would create an unnecessary and regulatory burden on businesses operating in Vermont, and would require significant resources within the Department of Financial Regulation to manage the information collected. A reporting regime of this scale would include millions of data points of data and would require a substantial investment of State dollars. We would also suggest the committee considers other reporting requirements already in place and how those are functioning today.

For the reasons above, NECTA strongly opposes H.467. We thank you for your consideration of these concerns and would welcome the opportunity to testify before the committee to reiterate our concerns with this bill and answer any questions the committee may have.

Respectfully,

A handwritten signature in blue ink that reads "Paul R. Cianelli". The signature is written in a cursive style with a large initial "P" and "C".

Paul Cianelli  
President and CEO