



IHS Markit™

January 23rd, 2018

To: House Committee on Commerce and Economic Development

Re: Opposition to Draft Legislation related to Data Brokers

On behalf of IHS Markit (IHSM) and its subsidiary R. L Polk & Co., I am writing to express my concerns and opposition to legislation being considered that will define and regulate Data Brokers. We believe this legislation places an undue burden on our industry with little impact on consumer fraud.

IHSM provides valuable motor vehicle information and analysis to the automotive industry as well as government agencies. IHSM is the leading provider of recall notifications to virtually all auto makers. IHSM also provides vehicle identification services to businesses and government agencies for fraud prevention. To accomplish this, IHSM (through its automotive division R. L. Polk & Co.) obtains vehicle title and registration information from all U.S. jurisdictions (including the Vermont DMV) and is regulated by each jurisdiction and the Federal Driver's Protection Act (DPPA). This legislation could have a negative impact on our access to vehicle data and reduce the quality of our services, including notifications to Vermont residents of important vehicle safety recall information.

Our major concerns with this legislation are the very broad definition of personal information, the requirements established for Data Brokers, and potential security breach notifications based on this new definition of personal information. We believe these requirements do not address the misuse and fraudulent access of an individual's personal information. In addition, we believe registration as a Data Broker with the Secretary of State's office is an unnecessary and burdensome requirement that will do little to fight the fraudulent use of personal information.

For these reasons we strongly urge you to reconsider this legislation.

Sincerely,

Dennis Haake
Director, Government Relations
IHS Markit