



March 27, 2018

Dear Chairperson Grad and members of the Committee,

Thank you for the opportunity to submit comments on S. 105 – An act relating to consumer justice enforcement. Members of the Lake Champlain Regional Chamber of Commerce operate in a variety of sectors and many of them use the type of standard-form contract covered by the bill. Members in the telecommunications sector are reliant on those contracts and would certainly experience negative impacts by the changes contemplated under S. 105. While well intentioned, S. 105 would have direct negative consequences to businesses operating responsibly in Vermont and likely result in costly litigation.

The prescriptive approach outlined in this bill contradicts the established framework for resolving disputes arising from the arbitration provisions in consumer agreements. This added complexity of necessitating Vermont-specific agreements would increase the difficulty for interstate businesses wishing to operate in Vermont. Further, the reporting requirement of S. 105 will demand that businesses reallocate limited resources while concurrently increasing the cost of arbitration. Finally, we would like to point out that most consumer contracts already include provisions mitigating against undue consumer costs and excessive travel requirements.

Thank you again for the opportunity to comment on S. 105.

Sincerely,

Thomas W. Torti

President, Lake Champlain Regional Chamber of Commerce