



THE ORTON FAMILY BUSINESS EST. 1946

**Testimony of Kara Soulia, President of The Vermont Country Store
H.71, An Act Related to Consumer Privacy and Online Surveillance
House Commerce and Economic Development Committee
Submitted May 4, 2026**

I am the newly appointed president of The Vermont Country Store, a leading family-owned retail business based in Vermont. My predecessor, Jim Hall, previously provided testimony on data privacy, voicing support of S.71 on behalf of our company. The Vermont Country Store was proud to support last year's S.71, which represented a privacy-protective bill aligned with numerous other states across the country.

The current working draft of S.71, including the proposed amendments from the House Commerce Committee, represents a novel and wholly untried approach with material differences from other state privacy laws, and raises significant questions about how businesses would implement and comply with their provisions in practice. As written, it would meaningfully affect our core business operations and increase compliance complexity for multichannel retailers both inside and outside of Vermont. For these reasons, I am respectfully submitting testimony for the record in opposition to the current working draft.

Although I am new in my role as president, I have been with the company for nearly 25 years. During that time, I have watched our business adapt to evolving technology and changing customer expectations while remaining grounded in our values and true to our roots in Vermont. Our operations are entirely located in Vermont, offering high-quality, practical, and distinctive products, and we value relationships with people, including the employees who provide world-class service in our stores, on the phone, and online, as well as our loyal customers across all 50 states and beyond. We have been doing business this way for 80 years, under the same family owners, since the Ortons founded our company in 1946.

Last year, we supported the passage of S.71 as a practical and balanced approach to consumer data privacy in Vermont. We continue to believe the Senate-passed version struck an appropriate balance between strong consumer privacy protections and allowing Vermont businesses to engage in responsible, transparent digital advertising to reach customers and sell goods and services. Traditional forms of advertising such as print, television, and radio have become less effective and significantly more expensive, while digital advertising has become the most cost-effective way for many businesses, including ours, to compete in a national marketplace.

For our company, rising paper, printing, and postage costs have made print advertising increasingly difficult to sustain. While we still print and mail catalogs nationwide, we have significantly reduced circulation and rely on audience segmentation to determine whom to mail. Digital advertising allows us to reach new customers and engage with them where they spend their time and attention —online.

We are concerned about the most recent version of S.71, which was released without advanced opportunity for stakeholder review. As a result, businesses have had limited time to evaluate the amended language and its impacts. Based on our initial review, the new provisions move far beyond a sensible and workable framework for consumer data privacy to a first-in-the-nation model that expands the scope of covered businesses and places strict limitations on how customer information may be collected and used.

In particular, definitions of key terms such as “targeted advertising,” “sensitive data,” “personal data,” “derived data,” and “publicly available information” are broad, complex, and, in some instances, potentially contradictory. This ambiguity makes it challenging for businesses to assess the magnitude of their impact. Even without full clarity on the consequences, it is evident that the bill’s impact would be far reaching.

I want to be very clear that The Vermont Country Store has long supported consumer data privacy and responsible data use. This commitment spans our entire 80-year history. As a multichannel retailer selling nationwide, we make a concerted effort to comply with state consumer privacy laws and we are accustomed to operating thoughtfully within evolving regulatory environments.

Since mailing our first catalog, decades before the advent of the internet and digital advertising, we have used customer information responsibly to build and maintain our mailing lists with the goal of mailing catalogs only to customers who want them. Based on our early assessment, the language in this draft would limit our ability to reach customers and reduce the number of catalogs we mail to Vermonters, because certain types of customer information could no longer be used for this purpose. While this may not be the bill’s intent, it’s an example of how it would impact businesses outside of the digital realm.

We were also disappointed by the removal of the notice to cure provision. Allowing businesses a reasonable opportunity to correct unintentional infringements before enforcement promotes cooperation, faster compliance, and more efficient use of state resources. While we would work diligently to comply with any new law in Vermont, the absence of a cure period would increase cost and complexity to Vermont businesses without necessarily improving consumer outcomes.

The concerns I have shared today are not comprehensive. Rather, they reflect our early and good-faith efforts to understand the practical implications of a complex and consequential bill introduced on a compressed timeline. Many aspects of the draft are untested, and Vermont would be adopting an approach that differs meaningfully from privacy statutes enacted elsewhere.

As you hear from data privacy experts and others who stand to gain from passage of this bill, I ask that Vermont businesses be given additional time to review the amended language, more fully understand its implications, and provide informed feedback.