



May 1, 2023

Senator Matt D. Klein
Chair, Senate Commerce and Consumer Protection Committee

Representative Zack Stephenson
Chair, House Commerce Finance and Policy Committee

Senator Robert J. Kupec

Representative Peter Fischer

Dear Chairs Klein and Stephenson, Senator Kupec, and Representative Fischer:

On behalf of CTIA®, the trade association for the wireless communications industry, I write to you in opposition to the inclusion of digital repair language in the omnibus commerce bill, which places mandates on original equipment manufacturers regarding diagnostic and repair information for digital electronic equipment. The marketplace continues to evolve and manufacturers continue to make changes to address consumer demand while offering consumers safe and reliable repair options. For example, manufacturers have relationships with authorized repair providers. These providers – which include local small businesses – have received the appropriate training from manufacturers and have the qualifications to help ensure that repairs are done properly and safely.

To further address the repair marketplace, CTIA launched two programs related to repair, the Wireless Industry Service Excellence (WISE) Technician Certification Program and the WISE Authorized Service Provider (ASP) Certification Program. The WISE technician program educates and tests wireless device repair technicians on industry-recognized standards, certifying those that meet the highest standards for service quality and technical skill. The first certification of its kind, WISE-certified device repair technicians provide consumers with a predictable, high-quality repair experience.¹ The WISE Authorized Service Provider (ASP) Certification Program creates a network of certified retail locations, helping consumers identify qualified providers that meet the highest standards for service quality and wireless device repair.²

Finally, CTIA is concerned that this legislation has the potential to weaken the privacy and security features of electronic products. The security of user information is of the utmost importance to consumers. The potential weakening of privacy and security protections will increase risks to consumers. With broad and unchecked access to technical information, security protections could be easily circumvented. In an era of sophisticated cyberattacks, we should not make it easier to hack devices and networks.

¹ <https://www.ctia.org/news/ctia-launches-technician-certification-program>

² <https://www.ctia.org/news/ctia-launches-retail-certification-program-for-wireless-device-repair>



If you proceed with including the digital repair language, CTIA recommends including language requested by TechNet and the Consumer Technology Association dealing with retroactive application of the language, cybersecurity, business-to-business, and business-to-government issues.

Sincerely,

A handwritten signature in black ink, appearing to read "Gerard Keegan".

Gerard Keegan
Vice President, State Legislative Affairs