



February 4, 2025

Rep. Joseph J. Solomon (Chair, House Corporations Committee)  
Rep. William W. O'Brien (Vice Chair, House Corporations Committee)  
Rhode Island General Assembly  
82 Smith Street  
Providence, RI 02903

**Re: Alarm Industry Concerns Regarding H 5246 / S 60 (Digital Electronics Right to Repair Act)**

Dear Reps. Solomon and O'Brien and Honorable Members of the Rhode Island House Corporations Committee:

The Alarm Industry Communications Committee (AICC), on behalf of the many central station alarm companies represented within its membership, respectfully wishes to identify its concerns about the current version of H 5246 / S 60, and requests that the Rhode Island House Corporations Committee refrain from advancing the Bill without an appropriate amendment to establish that electronic security and life safety systems are excluded from the scope of the Digital Electronics Right to Repair Act (the "Act"). To be clear, AICC does not oppose the concept of expanding the freedom of Rhode Island's citizens to repair mobile phones or the vast majority of consumer digital electronic devices. However, application of the Act in its current form to central station alarm technology and other security devices would endanger public safety by creating vulnerabilities in alarm monitoring systems that protect the citizens of Rhode Island from the threat of fires, medical emergencies and other life-threatening issues. If the disclosure of access codes, schematics and other information required by the Bill were to be applied to certain alarm devices, every family, business, hospital, bank, jewelry store, and power plant protected by one of these alarm devices could be put at risk. AICC respectfully requests that the Committee create an exclusion or exemption in the Act that is applicable to "security and life safety systems and equipment" (as defined below). This would ensure that consumers who have purchased alarm systems and equipment can continue to rely on the vital protections these devices afford.

**"Security and life safety systems and equipment" means a product designed to prevent, detect, protect against or respond to security incidents or safety hazards impacting individuals or property, including, but not limited to:**

- (1) A fire alarm.**
- (2) A medical alert.**
- (3) Intrusion detection.**
- (4) Video security.**
- (5) An access control system or device.**

AICC is a committee formed by The Monitoring Association (TMA), representing the vast majority of entities providing central station alarm security protection services. The Electronic Security Association (ESA) (representing security and fire alarm service providers) and the Security Industry Association (SIA) (representing alarm system manufacturers) are valuable members of AICC. Central station alarm operations protect tens of millions of families in their homes, a wide range of hospitals, businesses, public utilities and key government facilities (including military installations).

Central station alarm services often act as the “front line” in dispatching municipal police, fire units and emergency medical services. Alarm systems located on a customer’s premises sense fire, home and business invasions, medical emergencies, carbon monoxide and other threats, and instantly transmit this data to a central station. The central station in turn screens the alarm and alerts the Public Safety Answering Point (PSAP), *i.e.*, the dispatch office of municipal authorities, usually police, fire or medical/rescue departments, which then dispatches police officers, fire fighters, EMTs/paramedics and other first responders. This partnership between the alarm industry and the public safety community has literally saved countless lives. There are numerous UL-listed central stations serving Rhode Island’s citizens, such as Electronic Alarms of Warwick, AFA Protective Systems, and ADT.

Alarm companies utilize complex wireline, wireless and IP-based security systems. Much of their equipment must be installed and maintained in accordance with Underwriters Laboratories requirements. Fire Alarm systems are in part governed by NFPA 72<sup>®</sup>, National Fire Alarm and Signaling Code<sup>®</sup>. This standard, which is part of the Rhode Island Code<sup>1</sup> and has been adopted by all of the states and territories of the United States, has requirements for the qualifications of all who design, install, test and service a fire alarm system. Section 10.5.3.4 requires that those installing or repairing such alarm systems must be factory-trained and certified, and/or certified by Federal or state authorities, due to the risk associated with an improperly repaired system. No one may be harmed if the repair to a household appliance goes wrong. This is not true if an unqualified person improperly tinkers with an intrusion or fire protection system. If the system fails to operate, people could get injured or killed –

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<sup>1</sup> See R.I. Fire Alarm Code § 10.1(A) (at <https://rules.sos.ri.gov/regulations/part/450-00-00-10>).

including the consumer and others in the home, apartment building or adjacent areas. If a consumer is doing their own repair, or seeking a low-cost independent contractor, it is less likely that alarm-certified personnel will do the repair (since most consumers will not be aware of the above requirements). Rhode Island recognizes the importance of proper training for alarm technicians and it requires individuals and companies performing work on access control, fire alarms, video surveillance, and security systems to obtain a license through the Rhode Island Department of Labor and Training (DLT).<sup>2</sup>

An even bigger concern is that requiring an “open platform” concept for any central station alarm systems would create the genuine risk that a repaired or modified alarm system would be vulnerable to hacking, either because unscrupulous repair personnel may utilize the access codes, passwords or other information for nefarious purposes, or because the consumer or its contractor may store such sensitive information in a fashion that could be hacked by a third party. The daily news is rife with instances of consumer information being hacked due to poor security practices, which may be a significant risk in the case of a consumer or what may be undercapitalized small repair shops. If access codes, passwords, or alarm system schematics are either hacked or innocently made public (e.g., as part of a You Tube self-help video or iFixit online manual exhibiting how to power down a system, re-route a signal, or deactivate a system’s communication capability), it could allow malevolent actors to shut down entire alarm systems, endangering tens or hundreds of thousands of Rhode Island’s citizens, and potentially millions nationwide. If a bad actor is armed with such information, they can use it to disable similar alarm systems throughout the country. A theft ring could access a bank alarm system and shut it down, allowing robbery. Public transit surveillance camera systems could be shut down. Terrorists could disable the alarm protection system for a power plant and enhance their chances of shutting down the grid. Or worse, access could be gained to important defense installations in Rhode Island and neighboring states. Also, with the increasing use of video cameras for protecting homes and businesses, bad actors could gain remote access to video files of alarm customers and use surveillance information to gauge behaviors, timing and related activities of the protective premise for planning break ins or other crimes.

Nearly all states that have adopted a right to repair law to date have specifically excluded fire and security systems, including Colorado, California, and New York; and proposed legislation in other states such as Illinois, Massachusetts and Pennsylvania has included similar exclusions. These states are recognized as some of the most consumer-protective jurisdictions in the nation. Moreover, The Repair Association, an organization is at the forefront of the right to repair movement, has included an exclusion for fire alarm systems, intrusion detection equipment, life safety systems and physical access

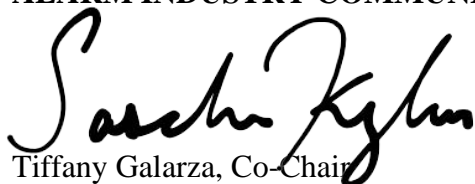
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<sup>2</sup> See R.I. Regs for Alarm Agents and Alarm Businesses (at <https://rules.sos.ri.gov/regulations/part/260-30-15-6>).

control equipment in its 2025 Legislative Template for Right to Repair statutes.<sup>3</sup> AICC asks that as the Rhode Island General Assembly considers any right to repair legislation applicable to digital electronics, it should recognize the need for a similar exclusion for alarm systems, in order to protect the safety of its citizens.

Respectfully submitted,

**ALARM INDUSTRY COMMUNICATIONS COMMITTEE**



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cc: Sponsors, Rhode Island General Assembly Bill H 5246 (2025)  
Sponsors, Rhode Island General Assembly Bill S 60 (2025)

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<sup>3</sup> The Repair Association's 2025 legislative template is posted at <https://www.repair.org/legislation> where there is a button to "[Download the Legislative Template for Digital Electronics.](#)"