



**Testimony of
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**In Opposition to
Rhode Island HB 5246**

**Before the
Rhode Island House Corporations Committee**

February 10, 2025

On behalf of CTIA®, the trade association for the wireless communications industry, I submit this testimony in opposition to House Bill 5246, which places mandates on original equipment manufacturers regarding diagnostic and repair information for certain digital electronic equipment. The marketplace already provides a wide range of consumer choice for repair with varying levels of quality, price, and convenience without the mandates imposed by this legislation.

The marketplace continues to evolve, and manufacturers and other market participants 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 small businesses in Rhode Island – have received the appropriate training from manufacturers and have the qualifications to help ensure that repairs are done properly and safely.

In addition to authorized repair providers, manufacturers may offer walk-in repair options at retail stores as well as mail-in services. Insurance providers may also offer repair options, including authorized third-party remote technicians that will travel to the consumer to perform repairs.



Moreover, consumers can currently avail themselves of numerous independent repair alternatives although manufacturers cannot guarantee the quality assurance of independent repair providers.

Additionally, many manufacturers have expanded repair options for consumers, from growing the number of authorized repair providers, to increasing access to tools, parts, and manuals directly to consumers. It is important that with more repair options available to consumers, consumers continue to have access to professional repair providers with demonstrable competence to provide a safe and reliable repair.

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 ASP 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 Both programs were created by CTIA's Reverse Logistics and Service Quality Working Groups, which convene members representing the entire reverse logistics community to address the wireless industry's challenges and develop requirements for industry-recognized standards in repair and refurbishment of wireless devices. CTIA also recently introduced the first ever postsecondary

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>



education mobile device repair certification program to provide an academic avenue for credentialing and certifying more device repairers.³

Wireless companies, individually, and through industry associations have taken proactive steps to provide consumers with more device repair options, while accounting for the need to maintain device integrity and security and to protect intellectual property rights. These include the expansion of CTIA's WISE program to include over 21,000 certified technicians nationally, continued growth of manufacturers' authorized repair networks, and the availability of access to tools, parts, and manuals directly to consumers.

CTIA is also concerned that this bill would have the unintended consequence of negatively impacting consumers of digital equipment by eliminating the need for repairers to demonstrate to consumers that they have the technical competence to perform safe, secure, and reliable repairs. Manufacturers want to make certain the repair providers they work with understand the numerous components of the electronic products being repaired. Their authorization to perform repairs ensures that the changes made to the devices are compatible with current technology and the networks on which they operate.

Finally, CTIA is concerned that this legislation has the potential to weaken the safety, 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 safety protections will increase risks to consumers. With broad and unchecked access to technical information, security protections

³ CTIA, *MCC to Launch First Mobile Device Repair Certification Program in Postsecondary Education* (Jan. 17, 2023), <https://www.ctia.org/news/mcc-to-launch-first-mobile-device-repair-certification-program-in-postsecondary-education>.



could be easily circumvented. In an era of sophisticated cyberattacks, we should not make it easier to hack devices and networks.

This bill is an unnecessary intervention in the marketplace, and its mandates could cause safety, privacy, and security risks that compromise consumer safety and protection. For these reasons, CTIA respectfully asks that you not move this legislation.