



**Testimony of
Gerard Keegan
CTIA
In Opposition to Senate Bill 2277**

February 15, 2018

**Before the
Rhode Island Senate Judiciary Committee**

Chair Lynch Prata, vice-chairs, and committee members, on behalf of CTIA, the trade association for the wireless communications industry, I submit this testimony in opposition to Senate Bill 2277, which would mandate burdensome notice and disclosure regimes for websites and online services and place potentially significant liabilities on internet companies providing such services to Rhode Island consumers.

The wireless industry takes a proactive approach to protect consumer privacy. Our members provide consumers with detailed privacy policies, which clearly describe how providers protect consumer data. Current federal and state statutes also provide additional layers of protection for sensitive consumer information.

CTIA member companies have long recognized the importance of protecting consumer data and respecting consumer privacy. In 2003, CTIA and wireless carriers that are signatories to the "Consumer Code for Wireless Service," including AT&T, Sprint, T-Mobile, and Verizon Wireless, made a commitment to help consumers make informed choices when selecting a wireless service plan.¹ The tenth point of the Code provides that signatory carriers agree to abide by policies for the protection of customer privacy. As part of that commitment, carriers follow policies regarding the privacy of customer information in accordance with applicable federal and state laws and make available privacy policies concerning information collected online.

¹ CTIA Consumer Code for Wireless Service, <http://www.ctia.org/initiatives/voluntary-guidelines/consumer-code-for-wireless-service>, last accessed 2/14/2018.



The wireless industry recognizes the importance of customer privacy and takes strong measures to protect customer data.

CTIA members have recommitted to principles that maintain privacy protections consistent with the effective Federal Trade Commission (FTC) privacy framework, covering transparency, consumer choice, security, and data breach notifications.² These principles reaffirm and restate internet service providers' longstanding, pro-consumer privacy practices based on the FTC framework that has protected internet users for years and provided the flexibility necessary to innovate new product solutions to enhance consumers' online experiences.

S2277 goes far beyond the FTC's privacy framework and even the broadband privacy regulations envisioned by the Federal Communications Commission. Additionally, the bill is overly broad and would require significant changes in the business operations of internet companies providing services to Rhode Island consumers. It is also important to note that state-specific privacy regulations, such as S2277, will be costly to comply with and ultimately confuse consumers without delivering consumer benefits.

In closing, CTIA members compete day in and day out for consumers based on the trust of consumers. Moreover, CTIA members have committed to a framework to protect consumer information. S2277 will introduce a host of unintended consequences that will negatively affect consumers and internet companies and place potentially significant liabilities on internet companies providing such services to Rhode Island consumers. For these reasons, we respectfully ask that you not move S2277.

² "Protecting Consumer Privacy Online," <http://www.ctia.org/docs/default-source/default-document-library/final---protecting-consumer-privacy-online.pdf>, last accessed 2/14/2018.