



March 13, 2020

Honorable Melissa Hortman
Speaker of the House
463 State Office Building
St. Paul, MN 55155

Via E-mail: rep.melissa.hortman@house.mn

RE: Opposition to House File 1138

Dear Speaker Hortman:

On behalf of CTIA®, the trade association for the wireless communications industry, I write in opposition to House File 1138. The marketplace already provides consumers a wide range of choices for repair with varying levels of quality, price and convenience without the mandates imposed by HF 1138.

This legislation would harm the marketplace by weakening the relationship that manufacturers have with authorized repair facilities and provides no protection or quality assurance for consumers.

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.

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.

Manufacturers also prize consumer brand loyalty and have gone to extraordinary lengths to establish that the devices they produce are of the highest quality. Authorized repair ensures those products maintain that high quality and guarantees that repairs meet the manufacturer's standards.

In addition to authorized repair providers, manufacturers may offer walk-in repair options at retail 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.

To further address the repair marketplace, CTIA recently 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 is also concerned that this legislation would have a number of unintended consequences for the security and operation of electronic devices. Legislation mandating the sharing of important and proprietary information regarding how electronic products operate, specific schematic diagrams and service code descriptions could weaken cybersecurity on devices and potentially harm the security of devices and the networks themselves.

Cyber criminals could more easily circumvent security protections, harming not only product owners but also everyone who shares their network. In an era of sophisticated cyberattacks, we should not make it easier for cyber criminals to hack security protections.

In addition, even if an independent repair provider is provided the technical information mandated under this bill, without specific training on reassembling a device, the provider could unintentionally cause antenna performance problems, stress on the device's frame, heat buildup or degradation of water tightness.

For these reasons, CTIA respectfully urges you not to move HF 1138.

Sincerely,

Gerard Keegan
Vice President
State Legislative Affairs

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>