



February 15, 2022

Chair Bramble  
Utah State House  
350 State St.  
Salt Lake City, UT 84103

**Re: CCIA Comments on SB 198 - Oppose**

Dear Chair Bramble and Members of the Senate Business and Labor Committee:

On behalf of the Computer & Communications Industry Association (CCIA), I write to express concerns with SB 198. CCIA is a not-for-profit trade association representing small, medium, and large communications and technology firms. For 50 years, CCIA has promoted open markets, open systems, and open networks.<sup>1</sup> CCIA advocates for balanced intermediary protections, which are critical for services that users rely upon to share information online. The Association believes SB 198 would place unreasonable burdens on companies and disproportionately harm small businesses in the state. As such, we urge the Committee not to advance the bill.

SB 198 would impose duplicative responsibilities on businesses with no tangible benefit to consumers. The bill requires that covered entities “clearly communicate to Utah account holders the social media corporation’s moderation practices” and implement a system to “provide notice to a Utah account holder no more than 24 hours after moderating the account holder’s post or account.” Through their terms of service, responsible digital services already voluntarily provide such information to account holders. There is no need to generate additional bureaucracy to effectuate what the marketplace is already accomplishing.

SB 198 would also disproportionately harm Utah’s small businesses. The proposed 24-hour notice requirement for moderated content or accounts is extremely burdensome for smaller digital services with fewer resources or staff, and infeasible for larger services operating at scale. This is especially problematic given SB 198’s one million account holder threshold and broad definition of “social media corporations.” As CCIA cited in a Salt Lake Tribune op-ed related to a similar content moderation bill last year, the notification costs associated with this bill could be potentially ruinous for small businesses and startups across the state.<sup>2</sup>

We appreciate the Committee’s consideration of these comments and stand ready to provide additional information as the Committee considers legislation related to technology policy.

Sincerely,

Alyssa Doom  
State Policy Director  
Computer & Communications Industry Association

<sup>1</sup> For more information about CCIA please see: <https://www.cciagnet.org/about>.

<sup>2</sup> Trevor Wagener, *Bill would undermine tech startups in Utah*, Salt Lake Tribune (Mar. 17, 2021), <https://www.sltrib.com/opinion/commentary/2021/03/17/trevor-wagener-bill-would/>.