



March 2, 2023

House Committee on Innovation, Internet, and Technology
Attn: Dawn Huntley, Committee Clerk
State House
82 Smith St
Providence, RI 02903

Re: H.B. 5745 - An Act Relating To Commercial Law -- Rhode Island Personal Data And Online Privacy Protection Act (Support).

Dear Chair Baginski, and Members of the Committee on Innovation, Internet, and Technology :

On behalf of the Computer & Communications Industry Association (CCIA), I write to support H.B. 5745, An Act Relating To Commercial Law -- Rhode Island Personal Data And Online Privacy Protection Act.

CCIA is a 50-year-old not-for-profit international tech trade association that advocates for policy and market conditions that benefit innovation, the tech sector, and consumers¹. CCIA supports the enactment of comprehensive federal privacy legislation in order to promote a trustworthy information ecosystem characterized by clear and consistent consumer privacy rights and responsibilities for organizations that collect data. A uniform federal approach to the protection of consumer privacy is necessary to ensure that businesses have regulatory certainty in meeting their compliance obligations and that consumers are able to understand and exercise their rights.

We appreciate, however, that in the absence of federal privacy protections, state lawmakers have a continued interest in enacting local legislation to guide businesses and protect consumers. In reviewing H.B. 5745, we recognize and appreciate the efforts that the legislature has taken to put forth proposed legislation that aligns with data and privacy laws that have been implemented elsewhere throughout the country. This concerted effort to align with other states' privacy laws will help ensure that businesses can comply without having to face significant costs associated with the development of new systems. Furthermore, the measures proposed in the legislation pertaining to enforcement and the enactment timeline provide businesses with a clear roadmap and sufficient time to ensure they are able to meet the standards set out in the bill, without having to fear the potential of being bombarded with frivolous lawsuits.

¹ For 50 years, CCIA has promoted open markets, open systems, and open networks. CCIA members employ more than 1.6 million workers, invest more than \$100 billion in research and development, and contribute trillions of dollars in productivity to the global economy. A list of CCIA members is available at <https://www.ccianet.org/members>.



We offer up only one suggested amendment to H.B 5745, which is to allow controllers additional time to respond to a consumer’s request to cease the processing of their data (Subchapter 6-59-7 (6)). The current language provides controllers with a maximum of fifteen days to comply with a consumer’s request, a time period that provides no degree of flexibility to businesses who may have to process numerous requests simultaneously, while ensuring that they are undertaking a scrupulous process to ensure that they are fully compliant with the consumer’s request. We suggest that the Legislature amend this language to extend the timeline by which controllers must comply with a consumer’s request to cease the processing of their data, or at a minimum create a mechanism for controller’s to obtain an extension to the compliance timeline when reasonably necessary.

In addition, as the Legislature considers the creation of a joint study commission to analyze algorithmic decision-making, as well as children’s data privacy and age verification on social media platforms, CCIA stands ready to help contribute to the commission’s work.

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

Sincerely,
Alex Spyropoulos
Regional Policy Manager, Northeast
Computer and Communications Industry Association