

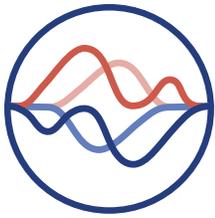


**Computer & Communications
Industry Association**

Open Markets. Open Systems. Open Networks.

The logo for ccianet.org, consisting of three overlapping circles followed by the text 'ccianet.org' in a sans-serif font, all enclosed in a rounded rectangular border.

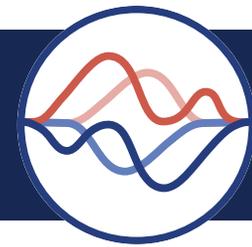
2025



State Landscape Competition



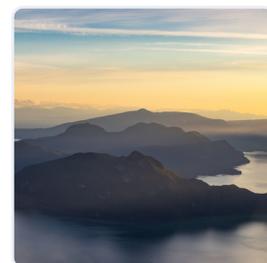
2025 State
Landscapes



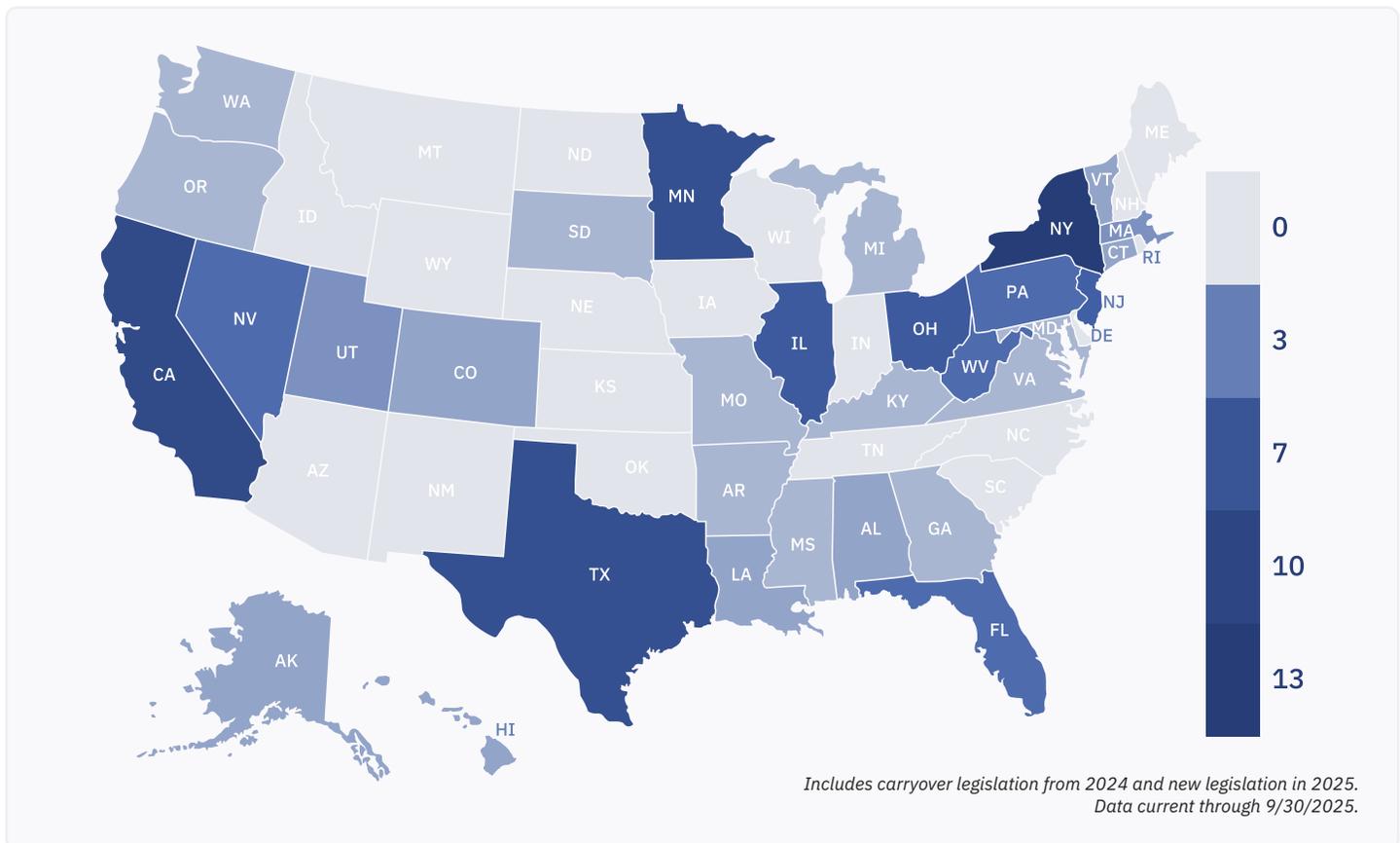
Competition

State Landscapes 2025

Each year, the Computer & Communications Industry Association (CCIA) State Policy Center releases policy overviews outlining major trends across the 50 state legislatures, highlighting key states active in competition policy. Competition is a fundamental driver of innovation in dynamic technology markets, driving companies to benefit consumers through new products and services. However, state-level interventions in this space risk creating a patchwork of competition regulations that increase compliance costs and chill investment. CCIA advocates for smart, well-targeted antitrust enforcement based on sound economic analysis, emphasizing consumer welfare over competitor protection. Monitoring state legislative trends is crucial for preparing future policy engagements, particularly as states borrow or adopt legislation that could potentially threaten the digital market ecosystem.



State Competition Landscape 2025



This year, state competition policy has been shaped by ongoing efforts to revise antitrust laws and regulate app stores, reflecting a broader trend among states seeking to address issues traditionally handled at the federal level. While Congress continues to debate comprehensive competition frameworks, such as the reintroduced Open App Markets Act, state legislatures are creating a patchwork of laws that impose new regulations on digital platforms and tech companies. These efforts often aim to curb perceived monopolistic practices or enhance consumer protections, but risk increasing compliance costs and stifling innovation, particularly as states adopt differing requirements. Key developments in 2025 include New York's continued push for the Twenty-First Century Antitrust Act ([S.335](#)), which passed the Senate but remains pending in the Assembly, and California's active antitrust reforms targeting algorithmic price fixing and premerger notifications.

Notably, we observed less movement on state competition issues this year compared to previous years. This slowdown could be attributed to the recent change in presidential administrations. Such transitions often prompt states to pause their legislative efforts while assessing how the incoming administration intends to address these issues at the federal level.

The Internet is characterized by extremely low barriers to entry and vibrant competition among market participants. Furthermore, many companies operating in digital ecosystems often operate with so-called multi-sided business models. To ensure that digital innovation continues to play a positive role in the economy, sound competition policy and antitrust enforcement must play a crucial role in fostering competition across markets.

CCIA believes in smart, well-targeted antitrust enforcement that recognizes different market realities supported by sound economic analysis. As such, regulators must be cognizant of choke points where market characteristics lead to competition problems. Given the vast differences in technology markets, CCIA's positions on antitrust cases are not ideological but case-specific and fact-driven.

CCIA encourages competition authorities to continue allocating resources to understand the market dynamics that govern the Internet, ensuring that enforcement actions address anticompetitive behavior that undermines innovation and consumer welfare. Similarly, CCIA intervenes, on a case-by-case basis, in those processes aimed at clarifying the antitrust norms applicable to companies operating on the Internet, providing the Industries' viewpoints to the benefit of consumers.

Types of State Competition Measures

1 Antitrust

Legislation targeting firms with significant market power that engage in practices deemed to harm competition, such as abuse of dominance, exclusive contracts, or unfair pricing strategies, often modeled after European-style regulations that prioritize preventing market dominance over consumer welfare. For example, California's Abuse of Dominance [proposal](#) seeks to redefine state-level antitrust enforcement by targeting single-firm conduct, such as exclusionary practices or predatory pricing, while lowering the bar for enforcement compared to federal standards. This approach aims to facilitate more aggressive regulatory action against perceived monopolistic behavior.

Example:

- New York [S.335](#) (*carried over to 2026 session*)

Impact:

These measures target monopolistic practices and forced arbitration, setting high penalties and vague dominance standards that create compliance challenges. CCIA has opposed such laws, particularly New York's S.335, as they risk punishing efficient market leaders and deterring procompetitive activity.

2 Price Discrimination

Laws prohibiting sellers from charging different prices to different buyers for identical goods or services, aiming to prevent anticompetitive practices that could lead to monopolies or harm consumers, but often lack clear criteria for what constitutes unfair discrimination.

Example:

- California [AB 325](#) (*signed into law, effective date January 1, 2026*)

Impact:

Bills targeting algorithmic pricing practices, such as California's AB 325, risk harming legitimate practices and consumer discounts due to unclear definitions. CCIA notes that they could reduce market flexibility and complicate compliance.

Merger and Acquisition Reporting Requirements

Regulations requiring businesses to notify state authorities of mergers or acquisitions, typically in addition to required federal filings under the Hart-Scott-Rodino Act, seek to enhance state oversight of transactions that may raise competitive concerns.

Examples:

- California [SB 25](#) (carries over to the 2026 session)
- Washington [SB 5122](#) (enacted, effective July 27, 2025)

Impact:

These laws require businesses to file premerger notifications with state authorities alongside federal filings, increasing compliance costs. If adopted widely, businesses could face up to 52 separate filings. CCIA has criticized these requirements, as in California's SB 25 and Washington's SB 5122, for creating redundant regulatory burdens that increase costs and chill investment.

Key States

California

California has led the nation in proposing competition legislation, with nearly 20 bills tracked by CCIA in 2025 targeting antitrust and app store regulations. SB 763 strengthens penalties under the Cartwright Act, SB 25 mandates state merger filings, AB 325 addresses algorithmic price-fixing. CCIA continues to engage to prevent a patchwork of burdensome regulations that could disrupt the tech industry.

New York

New York's legislature has championed the Twenty-First Century Antitrust Act (S.335), which passed the Senate in July 2025 but remains in the Assembly Economic Development Committee. A.2015, a companion bill, targets abusive practices and forced arbitration. A.8427 and S.8416 address unfair acts, including antitrust violations. CCIA has actively [opposed](#) these measures, citing risks to innovation and efficient businesses.

CCIA Actions on State Competition



Assessment of the Economic Costs of Imposing Abuse of Dominance Standards in New York State

The full report is available [here](#).

CCIA’s Research Center study highlighted that “The imposition of state-level “abuse of dominance” standards like those in the 21st Century Antitrust Act would lead to state-level antitrust policies stricter than federal antitrust standards. For New York state, the costs could be enormous: a GDP loss of \$318 billion, 615,000 fewer jobs, and an average lost wage per worker of \$9,283 over the next decade.”



Written Comments Regarding SB 335 - “Twenty-First Century Antitrust Act” (Oppose)

Comments available [here](#).

CCIA submitted written comments to New York General Assembly leadership opposing NY [SB 335](#).

2026 Legislative Outlook

Looking ahead to 2026, CCIA will continue to monitor state-level competition issues closely, as they remain an ongoing concern. States like New York are expected to reintroduce or to push existing carried over comprehensive antitrust legislation, such as variations of the Twenty-First Century Antitrust Act, building on prior efforts that stalled in committee. Similar trends may emerge in California and other active states, where lawmakers could revive or expand bills targeting mergers, price discrimination, and app store regulations. However, we anticipate pushback against these comprehensive antitrust

bills due to their significant fiscal impacts, including potential losses to GDP, job reductions, and increased compliance costs for businesses, as highlighted in CCIA’s recent [economic studies](#). This resistance may come from both legislators and stakeholders concerned about economic repercussions in a post-transition federal landscape. CCIA will advocate for balanced policies that prioritize consumer welfare and innovation, engaging with policymakers to prevent overly broad regulations that could fragment markets and deter investment.