



November 17, 2025

New Jersey Senate President Nicholas Scutari
67 Walnut Avenue, Suite 406
Clark, New Jersey 07066

RE: A 4101 and S 3017 – “Requires social media companies to establish toll-free telephone number for NJ account holders to report fraudulent account actions” (Oppose)

Dear New Jersey Senate President Nicholas Scutari:

On behalf of the Computer & Communications Industry Association (CCIA), I write to respectfully oppose A 4101 and S 3017. CCIA is an international, not-for-profit trade association representing a broad cross-section of communications and technology firms.¹ While CCIA supports strong consumer protection measures, the proposed bills do not adequately define covered businesses’ obligations and ultimately undermines customer service quality.

A 4101 and S 3017 do not adequately define covered businesses’ obligations.

The proposed bills do not adequately define the hotline’s required scope. Section 2.a requires covered businesses to provide a hotline allowing account holders to “report fraudulent activity on a New Jersey account holder’s social media account, including, but not limited to, unauthorized access.” However, the bills do not further define “fraudulent activity,” leaving covered businesses unable to determine what scenarios their representatives must be equipped to address. As such, it will be challenging for covered businesses to determine whether they are adequately complying with the law.

Maintaining the required hotlines may detract from more efficient methods of addressing consumer safety.

To maximize covered businesses’ ability to address consumer safety issues, covered businesses should be able to resolve such issues in the most efficient manner. Many covered businesses will be able to process consumer safety-related requests more efficiently via an internet portal than via phone, since account holders who file requests online will not be placed in a queue behind others with similar concerns. The resources required to maintain the proposed hotlines risk detracting from more efficient consumer safety response methods. Consequently, these bills risk reducing the number of consumer safety related requests that covered businesses can address in a given timeframe, ultimately undermining consumer protection.

¹ For more than 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>.



Moreover, processing consumer safety related requests over a phone hotline removes the potential for sorting requests by urgency upon receipt. Sorting such requests by urgency allows covered businesses to allocate more resources to the most severe threats of harm, and prioritize the most time-sensitive threats to their consumers. These capabilities improve overall consumer safety by minimizing account holders' exposure to the most severe threats.²

Processing consumer safety related requests online allows businesses to respond to consumer concerns more effectively and efficiently. This added efficiency benefits consumers, enabling faster response times and allowing extra resources to be allocated to the most pressing threats. Requiring covered businesses to redirect their resources towards less efficient response methods risks undermining consumer protection.

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We appreciate the Committees' consideration of these comments and stand ready to provide additional information as the legislature considers proposals related to technology policy.

Sincerely,

Kyle J. Sepe
State Policy Manager, Northeast Region
Computer & Communications Industry Association

² See, e.g., *How Meta Prioritizes Content for Review*, Meta (last updated Nov. 12, 2024), <https://transparency.meta.com/policies/improving/prioritizing-content-review/> ("Previously, human review teams would spend the vast majority of their time reviewing content reported by people. This meant they were often spending too much time on low-severity or clearly non-violating content and not enough time on the severest content with the greatest potential for harm.").