January 9, 2026

The Honorable Rebecca Bauer-Kahan
Chair, Assembly Privacy and Consumer Protection
1020 N Street, Room
Sacramento, CA 95814

Re: AB 883 (Lowenthal), as amended January 8, 2026: Elected Officials and Judges– Oppose Unless Amended

Dear Chair Bauer-Kahan,

TechNet and the above entities must respectfully oppose AB 883 (Lowenthal) unless it is amended. We share the goal of protecting sensitive personal information and keeping our elected officials and judges from harm, but the bill as currently drafted presents significant practical and legal challenges.

TechNet is the national, bipartisan network of technology CEOs and senior executives that promotes the growth of American innovation by advocating a targeted policy agenda at the federal and 50-state level. TechNet's diverse membership includes 100 dynamic American businesses ranging from startups to the most iconic companies on the planet and represents five million employees and countless customers in the fields of information technology, artificial intelligence, e-commerce, the sharing and gig economies, advanced energy, transportation, cybersecurity, venture capital, and finance.

AB 883, as recently amended, causes confusion about what information the Secretary of State will provide to the CPPA, specifically in provision (a)(1). The bill should be amended to clarify that the SOS will give the CPPA a list of elected officials sufficient to verify their identities as required by the current Delete Act Regulations. Once the list of officials is provided to the CCPA and uploaded to the accessible deletion mechanism, data brokers must delete the personal information of the elected officials in accordance with the current language of the Delete Act.

Furthermore, this would require additional clarification, given that, as drafted, AB 883 would prohibit businesses from retaining information solely used for security and integrity purposes, such as fraud prevention and consumer protection. The bill also does not include necessary exceptions for federally regulated transactions under the Gramm-Leach-Bliley Act (GLBA), Driver's Privacy Protection Act (DPPA), Fair Credit Reporting Act (FCRA), and Health Insurance Portability and Accountability Act (HIPAA). These transactions are non-public facing and are critical for identity verification, fraud detection, and other essential services.

Personal information is routinely exchanged between businesses to fulfill contractual obligations and comply with existing regulatory requirements. These exchanges do not risk public exposure of data and include use cases such as validating identity for financial transactions or accessing government benefits. For example, information collected and processed under the FCRA or GLBA is necessary to meet legal requirements and ensure system integrity.

While we recognize the highly visible and sensitive nature of serving in public office, elected officials and appointed court officers, like all individuals, participate in financial and economic activities that require lawful data transfers—such as paying taxes, purchasing homes, or verifying insurance claims. Prohibiting the sale or transfer of such information, even when done in compliance with federal law, would disrupt essential services and economic participation. Without narrowly tailored exceptions, this bill risks unintended harm to both consumers and the businesses that serve them.

The requested amendment below is included in the Delete Act in several instances, and the Committee, in their analysis of your AB 302 regarding the same deletion requests for elected officials and judges, acknowledged the "exemptions" continue to apply; we request that same certainty here, as well.

Incorporating similar provisions into this bill would address our concerns and strike a better balance between privacy protections and operational realities. Thus, we request the following amendment:

2) An entity receiving a notification that a deletion is required shall execute the deletion within ____ days and as limited by Sections 1798.105, 1798.145, and 1798.146.

Lastly, we respectfully urge amendments to remove the private right of action and to reconsider the proposed five-day compliance timeline. A failure to delete information within five days may occur through no fault of a data broker, particularly while the Accessible Deletion Mechanism remains in a testing phase. Existing law appropriately accounts for foreseeable technical and operational constraints by allowing data brokers up to 45 days to process consumer deletion requests. Aligning the bill with these established timelines and enforcement principles would help ensure accountability while avoiding premature penalties before the underlying mechanism has been proven operational.

For these reasons, we respectfully oppose AB 883 unless it is amended to align with other privacy protective provisions of the Delete Act.

If you have any questions regarding our position, please contact Robert Boykin at rboykin@technet.org or 408.898.7145.

Sincerely,

Robert Boykin
Executive Director for California and the Southwest
TechNet

Ronak Daylami, California Chamber of Commerce
Aodhan Downey, Computer and Communications Industry Association
Courtney Jensen, TechCA