



**Testimony of
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Maine LD 1716

Before the Maine Committee on Innovation, Development, Economic Advancement and Business

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Chairs and committee members, on behalf of CTIA®, the trade association for the wireless communications industry, I submit this testimony in opposition to L.D. 1716, an act to “establish a reparability index for consumer electronic products.” CTIA’s members include wireless service providers, infrastructure providers, suppliers, and manufacturers.

The requirements in this bill are unworkable. Setting a state regulation on products that are used across the country and throughout the world is untenable. There will be a significant burden placed on both government and industry as this undertaking will have a broad scope, high cost, and significant complexity. Such a complex issue with wide ranging implications cannot be adequately addressed at the state level. Standards in such an area need to be developed more broadly, such as nationally, to provide clarity for manufacturers and not create consumer confusion.

The mandates in this bill require the development of a consensus-based authority standards development body. The development of standards of this scope requires great expense and expertise in many areas to implement and require continued evaluation as updated and new technologies are brought to the marketplace. If the state moves forward



without a robust program, including sufficient oversight and long-term funding, then it risks imposing unnecessary market complexities and creating consumer confusion.

It is also important to note that repairability is not the only factor that needs to be taken into consideration regarding products. For example, longevity and durability of products are also important. A consumer could be unhappy with a product that is easily repaired but does not have characteristics that make it durable, helping it to remain intact when dropped or maintain resistance against water damage. All factors must be taken into consideration when developing any standards, and this is not something that should be done on a state-by-state basis.

Electronic products manufacturers have already developed robust policies and programs to ensure that they are continuously improving the sustainability of their products for their whole lifecycle, from design to material sourcing, product performance, reuse, and responsible end of life management.

Additionally, it is important to note that devices have value even when a consumer no longer wants to use a particular device. Many manufacturers and wireless service providers offer programs in which a consumer can trade in or donate a device. This provides a way to recycle old, unused devices, eliminating household clutter and protecting the environment.

Many manufacturers have expanded repair options for consumers as well. From growing the number of authorized repair providers, to increasing access to tools, parts, and manuals directly to consumers.



Because the mandates in this bill are unworkable, CTIA would respectfully request that the Legislature allow the marketplace to continue to address this issue before enacting prescriptive legislation like L.D. 1716.