

Dustin Brighton
Repair Done Right Coalition
LD 1716

January 9, 2024

The Honorable Chip Curry
The Honorable Tiffany Roberts
Members, Maine Committee on Innovation, Development, Economic Advancement,
and Business
Re: Electronics Manufacturers Opposition to LD 1716

On behalf of the hundreds of manufacturers and businesses our organizations represent, we respectfully oppose LD 1716.

Our organizations represent a broad spectrum of manufacturers of home appliances, consumer electronics, HVACR, security equipment, toys, lithium-ion batteries, and other connected electronic products, as well as companies that rely on the secure operation of these devices. All of these companies stand behind the quality of their products. Our members develop products and services for a wide range of commercial, government, and consumer users. Their customers depend on these products to operate safely, securely, and accurately, whether they are being used to support banking and commercial transactions, transmit and store sensitive personal data, support industrial operations, medical applications, or securely offer and deliver entertainment and other services.

The language in LD 1716 mandates the Department of Economic and Community Development to solicit from producers of consumer electronic products a repairability index for cellular telephones, laptop computers, television monitors, electric lawnmowers, top-loading washing machines, vacuum cleaners, and high-

pressure washers designed and intended for residential use by consumers. The Department would then be required to make available each score for each product on a website and require any sellers of the product to display the score at retail locations both in-person and online.

Repairability is just one aspect of what consumers look for when choosing an electronic device. Any scoring that might be developed should take into consideration other factors that a consumer might desire, such as durability, performance, energy use, and form factor. Otherwise, consumers will not receive a complete understanding of the quality of a particular device, and manufacturers could be disincentivized from designing products with features that consumers need and want.

LD 1716 seems to be based off of the French repairability index law. We believe that is the proper venue for policy as far-reaching as LD 1716: national and potentially international regulatory bodies that can implement one standard for an entire country or beyond. Industry must caution against a patchwork of 50 different state laws and indexes, as any scoring criteria should be consistent with globally recognized standards.

Additional concerns include the proper resources being dedicated by the Department of Economic and Community Development to such an order that has previously only been taken on by national or international governments. Does the department have the bandwidth to check whether every single product in the scope of the bill that is sold in the entire state will comply with the rules that are developed? We believe the state is underestimating the scope and complexity of this issue.

For these reasons, we urge the committee against moving forward with LD 1716 in its current form. Thank you for considering our perspective on this complicated issue.

Sincerely,

Air Conditioning, Heating and Refrigeration Institute (AHRI) Consumer Technology Association (CTA)
CTIA – The Wireless Association Entertainment Software Association (ESA) Internet Coalition
Medical Imaging & Technology Alliance (MITA) National Electronic Manufacturers Association (NEMA) NetChoice
PRBA – The Rechargeable Battery Association Repair Done Right
Security Industry Association (SIA) TechNet
Telecommunications Industry Association (TIA)