



July 28, 2021

The Honorable Janice D. Schakowsky
U.S. House of Representatives
Chair
House Committee on Energy & Commerce,
Subcommittee on Consumer Protection
& Commerce
2123 Rayburn House Office Building
Washington, DC 20515

The Honorable Gus M. Bilirakis
U.S. House of Representatives
Ranking Member
House Committee on Energy & Commerce,
Subcommittee on Consumer Protection
& Commerce
2123 Rayburn House Office Building
Washington, DC 20515

Dear Chair Schakowsky and Ranking Member Bilirakis:

On behalf of the Security Industry Association (SIA), thank you for holding today's legislative hearing focused on how legislation can modernize and improve the Federal Trade Commission (FTC). SIA represents over 1,200 innovative companies that provide safety and security technology solutions essential to public safety and the protection of lives, property, information, and critical infrastructure. SIA members include companies that provide advanced security solutions that are integral to the larger, digital ecosystem – e.g., "smart cities," the Internet of Things, and artificial intelligence – and our members strive to develop and field such technologies in ways that benefit society.

SIA supports initiatives that foster American innovation, safeguard consumer data, and ensure the FTC is well equipped to protect American consumers.

In the recently issued [Executive Order on Promoting Competition in the American Economy](#), the FTC is encouraged to look for ways to limit restrictions on third party or self-repairs of equipment and devices. "Right to repair," if construed broadly, could require our member companies and original equipment manufacturers (OEMs) of security equipment to disclose proprietary source code, diagnostic, and repair information to unauthorized, independent repair providers. The inner workings of security and life safety equipment is closely guarded, and for good reason. In the wrong hands, a manual describing how security and / or life safety equipment can be disarmed, silenced, or signals rerouted could have unimaginable consequences.

Currently, repair and service of security and life safety equipment is handled, by and large, by teams of individuals with specialized training, who often must undergo criminal background checks before gaining access to proprietary equipment and procedures. Those that rely on these systems for their protection, as well as those companies monitoring these devices trust that the equipment has been serviced by properly trained technicians, and the equipment will respond as is should if an emergency occurs.

Simple malfunctions can cause real, physical harm, and forcing the disclosure of repair information to unauthorized repair providers undermines the extensive training OEMs provide to third-party repair providers that are certified by the OEMs. In the case of security and life safety equipment and services,

consumer safety outweighs any potential savings that might be incurred by forcing security manufacturers to make public information about how their systems operate.

SIA maintains that competition in the security industry fosters innovation and spurs increased investment in R&D projects that solve critical problems to protect the general public. Broad “right to repair” requirements unduly burden small-to-medium sized manufacturers and certified repair providers that have dedicated significant resources to educating themselves on how to properly fix defected security equipment to prevent future harm to the customer and their family.

We thank you again for holding today’s timely hearing. SIA and its members stand ready to assist on relevant legislative priorities under the Committee’s jurisdiction.

Sincerely,

A handwritten signature in black ink that reads "Don Erickson". The signature is written in a cursive, flowing style.

Don Erickson
CEO – Security Industry Association

Cc: Members of the House Energy & Commerce Committee

For more information, please contact Joe Hoellerer, SIA Senior Manager of Government Relations, at jhoellerer@securityindustry.org