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April 13, 2026

The Honorable Akilah Weber Pierson, MD
California State Senate
1021 O St., Room 3310
Sacramento, CA 95814

RE: CTA Opposition to Senate Bill 898, Connected Consumer Products

Dear Senator Weber Pierson:

The Consumer Technology Association® (“CTA”) submits this letter in formal opposition to Senate Bill 898 (“SB 898”), connected consumer devices.

CTA is North America’s largest technology trade association, representing over 1200 American companies, many of which are based in California. Our members are the world’s leading innovators – from startups to global brands – helping support more than 17 million American Jobs. We also own and produce CES®, which convened tech leaders and over 4100 exhibiting companies in January.

CTA supports initiatives that empower consumers with greater transparency, including meaningful information about the technology they purchase. However, CTA respectfully opposes SB 898 because, in its current form, the bill imposes disclosures that will create confusion for consumers, inconsistent compliance burdens for companies, and unintended market distortions. CTA supports consumer transparency regarding product lifecycle, security updates, and support commitments. When consumers understand how long products will receive updates and how vulnerabilities are managed, they can make better purchasing and security decisions. However, CTA believes that the mandatory disclosure regime in SB 898:

1. **Fails to align with federal and international frameworks** that provide standardized, actionable information to consumers across different products and markets.
2. **May mislead consumers** by focusing narrowly on a “minimum guaranteed support time frame” without considering the complexity of modern connected products (e.g., cloud-based services, varying update mechanisms, and security patch schedules). Further, requiring that retailers, particularly small brick-and-mortar businesses, provide a comprehensive catalog of websites at the point-of-sale will no doubt result in consumers receiving outdated information even despite diligent compliance efforts.
3. **Imposes compliance burdens on small and medium manufacturers**, particularly those selling across multiple jurisdictions with differing disclosure regimes, without clear evidence that these disclosures improve consumer outcomes.

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4. **Duplicates and potentially conflicts with emerging voluntary labeling systems** designed by federal policymakers and industry working together to present security and support information in a consumer-friendly way.

U.S. Cyber Trust Mark: A Better Model for Consumer Transparency

CTA strongly supports the bipartisan U.S. Cyber Trust Mark, a voluntary federal labeling program managed by the Federal Communications Commission that is designed to help consumers identify products that meet established cybersecurity best practices. To achieve the U.S. Cyber Trust Mark, participating manufacturers must undergo testing and meet criteria that includes transparency about support period, update mechanisms (e.g., automatic vs. manual), and patch availability.

Key features of the U.S. Cyber Trust Mark program that align with CTA's principles include:

- **Voluntary and market-driven:** Companies choose to participate and earn consumer trust through certification against rigorous, standardized security criteria.
- **Standardized information:** Information accompanying the mark (including QR-linked registry data) will provide consumers with up-to-date details on product support periods, software update practices, and security advisories.
- **Consumer education and clarity:** The label and associated data help consumers easily compare products at the point of purchase without overloading them with legalistic disclosures.

CTA's support for the U.S. Cyber Trust Mark reflects our belief that *harmonized, industry-wide frameworks* that give consumers clear and comparable cybersecurity information are preferable to disparate, state-specific disclosure mandates.

Concerns with SB 898's Mandatory Disclosure Framework and Associated Requirements

While the intent behind SB 898 is understandable, CTA respectfully highlights the following concerns:

1. **Complexity and Consumer Interpretation:** Mandating disclosure of minimum support periods and lost features may be confusing without context about update frequency, severity of issues patched, security priorities, and whether updates require user action. For example, requiring individualized notification in advance of a support period expiring would prove challenging for manufacturers, particularly if the product was never registered or has changed owners.
2. **Regulatory Fragmentation:** A patchwork of state laws with different requirements may complicate product labeling and compliance, increasing costs for manufacturers and, ultimately, for consumers.
3. **Overlap with Federal Standards:** The U.S. Cyber Trust Mark program already envisions consumers being able to access support period and update information via QR codes and a registry, rendering separate state requirements unnecessary and duplicative.

4. **Innovation and Competition:** Rigid support disclosures risk penalizing innovative business models where ongoing service quality and updates evolve over time beyond an initial minimum timeframe.

CTA appreciates the legislature's goal of empowering consumers with meaningful information regarding the lifecycle and security of connected products. However, SB 898 would impose a mandatory disclosure framework that is misaligned with effective transparency models and risks creating consumer confusion and regulatory fragmentation. CTA urges you to consider alternative approaches — particularly supporting the harmonized, voluntary U.S. Cyber Trust Mark program — as a more constructive path to achieving the shared goal of transparency and security for California consumers.

For more information, please contact J. David Grossman (dgrossman@cta.tech) or Katie Reilly (kreilly@cta.tech).

Respectfully submitted,

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