

February 24, 2026

**MEMORANDUM IN OPPOSITION**  
**A.10132-A (Otis)**  
**“Connected Consumer Product End of Life Disclosure Act”**

The Consumer Technology Association (CTA) is North America’s largest technology trade association, representing over 1200 American companies, many of which are based in New York. Our members are the world’s leading innovators – from startups to global brands – helping support more than 18 million American Jobs. We also own and produce CES®, which convened tech leaders and over 4500 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 A.10132 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 A.10132:

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provide a comprehensive catalog of websites at the point-of-sale will no doubt result in consumers receiving outdated information even despite diligent compliance efforts.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.

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 A.10132's Mandatory Disclosure Framework and Associated Requirements**

While the intent behind A.10132 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, A.10132 would impose a mandatory disclosure framework that is misaligned with effective transparency models and risks creating consumer confusion and regulatory fragmentation.

CTA urges the Committee 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 New York consumers.

For more information, please contact J. David Grossman ([dgrossman@cta.tech](mailto:dgrossman@cta.tech)), or our legislative representatives James Carr ([jcarr@hinmanstraub.com](mailto:jcarr@hinmanstraub.com)) or Matthew O'Connor ([moconnor@hinmanstraub.com](mailto:moconnor@hinmanstraub.com)).

Respectfully submitted,

J. David Grossman  
Vice President, Policy & Regulatory Affairs  
Consumer Technology Association

Katie Reilly  
Vice President, Environmental Affairs and Industry Sustainability  
Consumer Technology Association