

March 26th, 2025

**RE: BILL NUMBER H-5551 – AN ACT RELATING TO COMMERCIAL LAW--GENERAL
REGULATORY PROVISIONS -- UNIT PRICING**

Dear Chairman Solomon,

On behalf of VusionGroup Inc., we respectfully urge the Rhode Island House Committee on Corporations to thoroughly study proposed regulations concerning Electronic Shelf Labeling (ESL) and to reject H-5551 in its current form. We recognize the concerns regarding dynamic pricing; however, as a leader in the ESL industry, we believe addressing common misconceptions about ESL technology is crucial for protecting consumers and retailers alike.

For over 30 years, VusionGroup has partnered with retailers and brands to successfully implement ESL systems; transforming retail environments into efficient, intelligent, and interconnected physical spaces. This technology provides significant economic, social, and environmental benefits by streamlining store operations, reducing waste, and ensuring pricing accuracy.

ESL technology is not designed to be utilized for dynamic or “surge” pricing or personalized pricing adjustments for customers. It is essential to note that ESL tags lack cameras, do not utilize facial recognition, and do not access personal customer data to modify prices in real-time.

Rather than contributing to pricing discrepancies, ESL technology helps enable uniform and consistent pricing in retail environments, fostering fairness and transparency for all consumers. Moreover, ESL systems provide robust security, exceptional reliability, and scalability for retailers facing ever-growing labor shortages. This empowers retail employees to focus on enhancing customer service quality and efficiently managing other critical operational tasks, ultimately improving the customer’s shopping experience.

The current requirement proposed in H-5551 to attach an additional stamp, tag, or label is redundant for retailers already utilizing ESL systems and undermines the significant labor and environmental benefits offered by this technology. Retailers utilizing ESL technology regularly report that retail employees have increased capacity for higher priority tasks which results in a more engaged and happier workforce, as well as significantly decreased reliance on single-use paper and plastic tags, adhesives, and fixtures.

Furthermore, ESL systems enhance the consumer experience by accurately presenting prices, highlighting promotions through customizable lighting, and displaying eligibility indicators for assistance programs such as Women, Infants, and Children (WIC).

We strongly encourage the Committee to carefully reconsider H-5551 to ensure Rhode Island retailers and consumers continue benefiting from innovative ESL technologies without unnecessary regulatory burdens.

Sincerely,



Jessica Vittorio
Senior Vice President of Legal
VusionGroup, Inc.