



Testimony: House Bill (HB) 7180
Digital Right to Repair

Committee: House Corporations Committee

Date: March 12, 2026

Position: Request for Exemption

Dear Chair Solomon, Vice-Chairs O'Brien and Caldwell and Members of the House Corporations Committee:

I serve as Senior Director of State Government Affairs for the Air Conditioning, Heating, and Refrigeration Institute (AHRI). I appreciate the opportunity to submit this testimony on behalf of AHRI regarding Rhode Island HB 7180 Digital Electronics Right to Repair Act (HB 7180) to respectfully request an exemption for its members' products and equipment.

AHRI represents more than 330 manufacturers of air conditioning, heating, and commercial refrigeration (HVACR) and water heating equipment. It is an internationally recognized advocate for the HVACR and water heating industry and certifies the performance of many of the products manufactured by its members. In North America, the annual economic activity resulting from the HVACR and water heating industry is more than \$211 billion. In the United States alone, AHRI member companies, along with distributors, contractors, and technicians employ more than 700,000 people.

AHRI is concerned about the inclusion of residential HVAC and water heating equipment under this bill, as the bill's definition of "digital electronic equipment" appears broad enough to encompass these products, which increasingly rely on embedded digital controls and IoT technologies to operate. Modern HVAC and water heating systems integrate advanced electronic components like compressors, coils, fans, thermostats, air filters, and ductwork, which all regulate temperature, humidity, and air quality. Since these systems implicate public safety, they require installation, maintenance, and repair by qualified professionals to ensure proper operation.

HVAC and water heating systems are complex, highly specialized technologies that require more than access to original equipment manufacturers (OEMs) tools, parts, and manuals to service properly. Safe and effective service requires trained, certified technicians. The Clean Air Act has recognized this since 1990, requiring technicians servicing refrigerant-containing equipment to hold U.S. Environmental Protection Agency (EPA) Section 608 certification. Improper handling

or servicing of refrigerant-containing equipment can jeopardize safety and performance, undermine energy efficiency goals, and void manufacturer warranties.

Several states have enacted right-to-repair laws that expressly exempt HVAC and water heating equipment, recognizing the safety-critical and regulated nature of these systems, including New York (2022), Oregon (2024), and Texas (2025). The 2024 Oregon Right to Repair law has the most precise language.

Oregon [SB 1596](#) (3) (g) (B) (iii) (2024) expressly states:

This section does not apply to a product or service or equipment that provides heat, ventilation or air conditioning or recharges refrigerant gases.

Consistent with these precedents, we respectfully request that HB 7180 be amended to explicitly exempt HVAC and water heating equipment, like Oregon's right-to-repair law (SB 1496 2024), which clarified its digital electronic equipment definition and exempted air conditioning or heating units that have a digital electronic product embedded within it.

Thank you for your time and consideration. I would be happy to schedule a meeting to discuss this further at your convenience. I can be reached at psmeltzer@ahrinet.org or by phone at 202-304-9995.

Sincerely,



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