

20 Lewis St
Providence, RI 02906
April 28, 2026

House Judiciary Committee
82 Smith St
Providence, RI 02903

Dear Chair McEntee and Members of the Committee:

Rhode Islanders for Personal Privacy opposes H8098 due to the bill's inadequate privacy protections.

The bill requires people with speeding tickets to install an Active ISA device in their cars. Active ISA devices not only strictly limit the car's speed but also capture information about the driver's travel and itinerary with insufficient privacy protections. There is no need to invade the driver's privacy in this way, but the driver would not be allowed to opt out. The bill applies to a significant fraction of drivers, who would be required to install this device at their own expense.

Although advocates claim it would only apply to "super speeders", in fact the bill would require drivers to install an active ISA even if they have only one traffic violation. For example, many drivers drive 75-80mph in the Pawtucket portion of I-95 slowing down to 65-70mph for the tightest curves, and substantial stretches of I-95 in that area are signposted at 45mph even though there is very little risk in driving 30-35mph more than that. A driver who receives a single ticket for driving at 75-80mph in that area would, under this bill, be required to install an Active ISA device, which would physically prevent the driver from going even slightly over the posted speed limit in future.

Active ISA devices are not cheap, but the bill would require the driver to pay whatever the vendor chooses to charge for them. Currently the daily fees alone would mount to over \$1000 per year, plus whatever the vendor charges for an installation fee and removal fee, and the vendor has plenty of room to hike these fees much further, since the vendor's "customers" have no ability to refuse to pay. These charges are unaffordable to many Rhode Island drivers.

Active ISA devices also gather information on the driver's speed (despite the fact that the driver is physically prevented from going past the speed limit) as well as the locations the driver travels through. The bill includes some provisions about the privacy of that information, but not enough. What needs to be protected for privacy purposes is not just the information actually "collected" by an Active ISA device, but also any further information "derived" from the data that the device collects. The bill's language only includes privacy protection for information actually "collected" by the Active ISA device, not for "derived" information, so the vendor is allowed to sell or rent out or otherwise monetize the "derived" information which can enable other companies to track where the driver is going. The bill's privacy language needs to be tightened to cover the derived information as well. Otherwise the vendors, who are already able to make huge profits, will be able to sell

A substantial number of Rhode Island drivers travel at the speeds targeted in this bill and know how to do so with a considerable amount of safety: they know how to travel 75-80 mph in some parts of I-95 in Pawtucket and they know how to slow down further on the tightest curves.

The bill amounts to treating faster drivers in a similar way to drunk drivers, who are currently required to use ignition interlock devices. But ignition interlock devices for drunk drivers target drivers known

to be doing something that is truly seriously unsafe; there is no way to drive drunk safely. In contrast, many of our neighbors are skilled drivers who, when they drive quickly, know how to avoid an accident at the speeds they travel at. There may be a very slight additional risk from going over the speed limit but it is nowhere near enough to justify imposing these huge costs and privacy violations on drivers who have gotten a speeding ticket. In many cases where drivers get a speeding ticket, it was perfectly clear that nobody was in real danger at the time. They should not be treated the way drunk drivers are; existing laws and existing enforcement work reasonably well in preventing problems.

But if a version of this bill is passed, the completely unnecessary privacy flaws in the bill would need to be fixed first.

Randall Rose
Rhode Islanders for Personal Privacy