

**Attachment #25**

Roberts Carroll Feldstein & Pierce, 5/2/19 letter

May 2, 2019

Honorable Evan Shanley  
Chair, The Rhode Island Online Data Transparency and Privacy Protection Commission  
State House  
Providence, RI 02903

**RE: H 7111A/3— An Act Relating To Commercial Law—General Regulatory Provisions— Rhode Island Right-To-Know Data Transparency And Privacy Protection Act**

Dear Chair Shanley:

I am writing on behalf of the Greater Providence Chamber of Commerce with concerns regarding the draft H 7111A/3. While the business community within this state shares in the bill's overreaching goal of protecting consumer privacy, this bill would be problematic because the bill would create expensive requirements that would hinder a businesses' ability to conduct operations in an efficient and cost effective manner on behalf of its customers. Privacy of consumer information is regulated at the federal level in the United States, and therefore, many provisions within the bill are duplicative and unduly burdensome.

Specifically, the definition in the bill of "affiliate" may be so broad as to eliminate a businesses' ability to share necessary information with partners to conduct business. In addition, the definition of "Personally Identifiable Information" is also very broad to capture nearly all information gathered from an individual, which would also make it very difficult to provide necessary data to partners to conduct business. Furthermore, this bill will likely have unintended negative consequences for both businesses and consumers and there may be a better, more efficient and cost effective means for accomplishing privacy protections at the state level.

As always, the Greater Providence Chamber of Commerce appreciates your consideration of our input and perspective.

Very truly yours,



Elizabeth A. Suever  
EAS/eas  
4226-15/3464174