



**Testimony of
Mike Blank
CTIA**

**In Opposition to
S 2768 – Relating to Unfair Sales Practices**

**Before the
Rhode Island Senate Commerce Committee**

April 14, 2026

On behalf of CTIA, the trade association for the wireless communications industry, I write in opposition to S 2768 that seeks to place mandates on automatic renewals and the cancellation of subscriptions. CTIA respectfully opposes the bill because we believe it negatively impacts wireless providers which generally offer services that are renewed on a month-to-month basis. As providers of services that are generally used daily to connect consumers to school, work, and loved ones, we want to ensure that our consumers have those services when they are expected or needed in emergency situations.

If Rhode Island chooses to pursue a broad automatic renewal law, then we ask that it provide exemptions similar to those in other states. For example, states like California¹ and Connecticut² specifically exempt the following:

Any business or its affiliate where either the business or its affiliate is regulated by the Rhode Island Public Utilities Commission, the Federal Communications Commission (FCC), or the Federal Energy Regulatory Commission (FERC)

¹ Cal. Bus. & Prof. Code §§ 17605(b)

² Connecticut Chapter 742d Sec. 42-158-ff(4)



In addition, Rhode Island should consider revising the current exemptions related to the insurance industry and service contracts to align more closely with that of other states with automatic renewal laws. CTIA suggests the following example language from Connecticut³:

Any individual or entity regulated under Title 27, Insurance Code, or an affiliate of the individual or entity
An individual or entity providing a service contract, as defined in Section 6-57-1 of the Rhode Island Commercial Code, or an affiliate of the individual or entity

We appreciate the goal of protecting consumers from practices that may undermine their ability to make informed purchasing decisions, and our industry is committed to ensuring consumers have accurate and transparent information. However, *accidental* service cancellation could leave a customer without access to the internet or without mobile wireless service. It is for this reason that we prefer to work directly with our customers prior to the cancellation of service.

Since 2003, CTIA's Consumer Code for Wireless Service has been an integral part of delivering superior customer service to wireless consumers. The Code – which is followed in all 50 states – has helped consumers make informed decisions when selecting a wireless plan and has contributed to the continued competitiveness within the wireless industry. The Code affords wireless providers the flexibility to respond to changes in consumer demand.

Wireless carriers that are signatories to the Code, including AT&T, T-Mobile, and Verizon, have committed to voluntarily adhere to a set of industry standard principles. These principles include agreeing to disclose to consumers at point of sale and on their web sites whether a fixed-term contract is required and its duration; the amount and nature of any early termination fee that may

³ Connecticut Chapter 742d Sec. 42-158-ff(4)



apply; and the trial period during which a consumer may cancel service without any early termination fee, as long as the consumer complies with any applicable return policy, in addition to providing ready access to customer service. The Code has helped consumers make informed decisions when selecting a wireless plan and has contributed to the continued competitiveness within the wireless industry. Additionally, the industry has evolved to offer no-contract rate options for consumers as well as installment plan pricing for mobile phones.

Further, the wireless industry is currently regulated by the FCC, which has its own regulatory regime to protect consumers from surprise or unfair fees and billing practices, including its Broadband Labeling and Truth-in-Billing rules. Rhode Island should look to align any new automatic renewal law with other states and include similar exemptions to the language suggested above.

Our industry wants to avoid customers inadvertently cancelling their phone service, resulting in the loss of service and even their phone number. Instead, cancellations for wireless service should be carried out through interaction with a customer service representative to ensure these risks are understood. Too, mobile service is unique in that customers generally do not cancel their wireless service entirely but typically choose to move to another carrier. Customers may move their mobile service to a new carrier by “porting” their number and beginning service with a new wireless provider at any time without ever having to speak with their current provider. As a result, our customers do not encounter the kinds of obstacles to cancellation this legislation seeks to address.

Thank you for your consideration.