February 12, 2026

The Honorable Matthew LaMountian, Chair
Senate Judiciary Committee
Rhode Island State House
82 Smith Street
Providence, RI 02903

RE: SB 2487 Right to Repair - Oppose

Dear Chairman LaMountian,

On behalf of the Advanced Medical Technology Association (AdvaMed), Medical Device Manufacturers Association (MDMA), and the Consumer Healthcare Products Association (CHPA) we write today to express concerns with the right-to-repair legislation (SB 2487) in Rhode Island. Our membership comprises the full spectrum of health technology innovators and manufacturers, who work every day to deliver high-quality healthcare for patients worldwide.

Patient safety is our membership's top priority, and this legislation unnecessarily exposes patients to an increased risk of harm or death. As introduced, SB 2487 requires medical technology providers to share proprietary design and repair information with third-party servicers. Often, these providers lack the necessary training to repair complex medical systems. Patients and consumers rely on a technology's accuracy to provide proper diagnosis and maintain safety standards.

Original Equipment Manufacturers (OEMs) are subject to strict regulations by the Food and Drug Administration (FDA) to ensure patient safety. These regulations protect the safety and efficacy of medical devices and include registration with the FDA, implementation of quality and safety controls, proper training, and qualification of replacement parts. Independent third-party service providers are not held to the same standards. A 2018 report by the FDA found more than 4,300 adverse events – including 294 serious injuries and 40 deaths – from devices repaired by unauthorized third-party providers.

These complex issues are accounted for in federal legislation known as the Fair Repair Act – a right-to-repair bill that provides a full exemption for

medical device manufacturers. Similar exemptions are provided in bills introduced in Minnesota, Washington, Oregon and New York.

We respectfully recommend the committee amend the bill with the following exemption language:

> *Nothing in this chapter shall apply to manufacturers or distributors of a medical device as defined in the federal food, drug, and cosmetic act, Title 21 U.S.C. Sec. 301 et seq.*

Safety and security are paramount to our members and the patients they serve. We appreciate your consideration of our concerns and are committed to working with the legislature on this critical issue. Feel free to contact any of our organizations with additional questions.

Thank you again, and we look forward to working with you.

Sincerely,

Adrienne Frederick
Director, State Government & Regional Affairs
AdvaMed

Carlos I. Gutiérrez
Vice President, State & Local Government Affairs
Consumer Healthcare Products Association

Clayton Hall
Executive Vice President, Government Affairs
Medical Device Manufacturers Association