

Submitted Electronically

Letter of Opposition Rhode Island SB 2487: Digital Electronics Right to Repair Act

Senate Judiciary Committee

March 3, 2026

Chair LaMountain, Vice Chair McKenney, Secretary Bissailon and Honorable Members of the Rhode Island Senate Judiciary Committee:

The Engine Technology Forum (ETF) is an educational organization that represents manufacturers of internal combustion engines such as gasoline and diesel engines, vehicles, machines and equipment and their components as well as both petroleum and renewable biofuel producers.

Through original research, education, and fact-based outreach, we seek to expand the broader understanding about the benefits and advancements in advanced internal combustion engines, technologies, and fuels as well as their significance to our economy and how they help achieve clean air and climate goals. You can learn more about us on our website enginetechnologyforum.org.

We are writing to express our opposition to SB 2487 unless amended. Like the members we represent, ETF is concerned that broad-based Right to Repair legislation will facilitate the tampering of emissions control systems on engines used for off-road purposes, a practice likely in violation of the federal Clean Air Act, and one that will negatively jeopardize the air quality and environment in Rhode Island. (An infographic on advanced diesel engine progress to this effect and one on anti-tampering are included below.)

Therefore, respectfully request the Committee amends SB 2487 to include the following language to so the legislation does not inadvertently jeopardize technology relating to highly sophisticated engine and emissions control systems. We believe this is outside of the intended scope are purview of the legislation.

“Manufacturers, distributors, importers, or dealers of all off-road (non-road) equipment, including without limitation, farm and utility tractors, farm implements, farm machinery, forestry equipment, industrial equipment, utility equipment, construction equipment, compact construction equipment, road-building equipment, mining equipment, turf, yard and garden equipment, outdoor power equipment, portable generators, marine, all-terrain sports and recreational vehicles (including racing vehicles), stand-alone or integrated stationary or mobile internal combustion engines, other power sources (including without limitation generator sets, electric/battery and fuel-cell power), power tools, and any tools, technology, attachments, accessories, components, and repair parts for any of the foregoing.”

Thank you for your time and consideration of this request for a technical amendment. We welcome the opportunity to be of resource to the committee or answer any questions or concerns you may have on this or related matters.

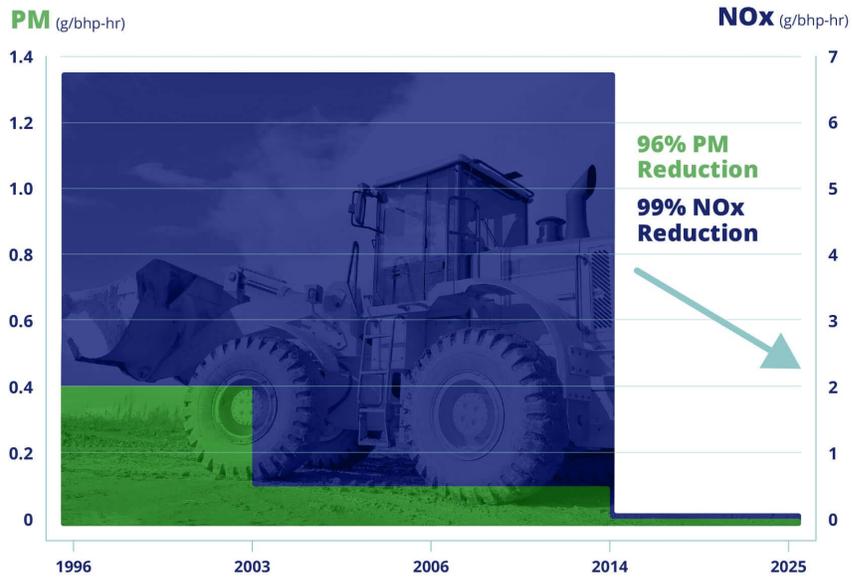
Sincerely,

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ADVANCED DIESEL PROGRESS Large Off-Road Equipment



Source: U.S. EPA Office of Transportation and Air Quality (OTAQ)

Keep it Clean Don't Tamper with Emissions Controls



Top 10 Reasons Not to Tamper with Emissions Controls

- 1 It is illegal and will cost you – a person may be liable for a maximum civil penalty of **\$4,819** per defeat device manufactured, sold, or installed, or per vehicle tampered. A dealer or vehicle manufacturer who tampers with a vehicle may be subject to significantly higher civil penalties.

IT WILL...

- 2 void your vehicle or equipment warranty.
- 3 cause problems in other parts of the vehicle or equipment.
- 4 cause problems with insurance.
- 5 violate job contracts.
- 6 increase air pollution.
- 7 make your vehicle or equipment unsafe to operate.
- 8 violate employer health and safety laws.
- 9 make your vehicle tough to sell and reduce its value.
- 10 bring the wrong kind of publicity to you and your business.

Embrace the new generation of efficient, powerful, and near-zero emissions diesels. Be good stewards of the technology and environment, don't tamper!

Whatever you call it...

- reprogramming
- tuning
- chipping
- defeating
- bypassing
- disabling
- removing

It's all the same: **TAMPERING**

It is illegal to install aftermarket emissions defeat devices, as well as remove or bypass emissions control devices like catalytic converters or particulate filters. It is also dangerous and bad for the environment.

If you suspect someone is manufacturing, selling, or installing illegal defeat devices or otherwise tampering with emissions controls, tell the EPA by emailing: tampering@epa.gov.



A message from the Engine Technology Forum. For more information visit enginetechnologyforum.org

Report Environmental Violations

Learn more at: <https://echo.epa.gov/report-environmental-violations>.