



March 3, 2026

Senator Matt LaMountain, Chair
Senate Judiciary Committee
Rhode Island State House
82 Smith Street
Providence, RI 02903

Re: Concerns related to Parts Pairing Prohibition in **SB-2487**

Dear Senator LaMountain & Members of the Judiciary Committee

Thank you for the opportunity to express Xerox's concerns about the digital electronic equipment right to repair legislation currently under consideration by the Committee as SB-2487.

Right to Repair

The R2R (Right to Repair) movement in the United States advocates for end-customer's ability to repair and modify their own devices and equipment. For the past thirty years, we have supported R2R for our devices. We have also built a robust circular economy with take back programs for our products. Unfortunately, we oppose the "parts pairing" provisions of SB-2487. We cannot comply with any law that includes parts pairing due to Federal restrictions unique to Imaging devices.

Restrictions for Print Imaging Devices

Rhode Island's proposed Right to Repair Law (SB-2487) prohibits "Parts Pairing". Given this provision, Xerox cannot comply with the proposed law because **federal law MANDATES** Anti-Counterfeiting Deterrence (ACD) and Anti-Terrorism (AT) features imbedded within the devices as a system required under [US Code - 18 USC 474A](#) and regulated under confidential and undisclosed security agencies, including the Department of Homeland Security and Treasury Department requiring traceability for law enforcement purposes.

The purpose of our testimony is to notify key legislators of these overriding restrictions on imaging devices and request a technical correction to SB-2487 to allow for compliance with Federal Law and mandates, similar to how other states are addressing the issue.

Some states, **Pennsylvania (SB-833)** and **Ohio (HB-301)** have included specific language clarifying that nothing in their acts prohibit parts pairing of print imaging devices. Other states, such as Arizona (**HB-2121**), Wyoming (**HB-15**), Vermont (**HB-161**) & Maine (**LD-1908**)



have addressed the mandate for traceability by including language clarifying their chapters do not apply if they violate Federal Law.

To harmonize Rhode Island's bill with the other states, we propose a new subsection at **6-63-5. Limitations.** (f) as follows:

“Nothing in this subsection shall be construed to prohibit parts pairing of print imaging devices”.

This technical adjustment allows Xerox to comply with Federal mandates and preserve the strong consumer repair protections in the Rhode Island bill while clarifying that print imaging devices remain outside the scope of the parts pairing ban. It ensures Rhode Island's legislation is comprehensive but also aligned with other state frameworks, reducing potential conflicts for national manufacturers, easing implementation and allowing for compliance with Federal mandates.

Thank you for your consideration of Xerox's concerns.

Regards,

Susan Tevnan

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