

Howard Johnson, Inc

3-2-26

VIA EMAIL to the Senate Judiciary Committee

- **Chair:** Sen. Matthew L. LaMountain — sen-lamountain@rilegislature.gov
- **Vice Chair:** Sen. Mark P. McKenney — sen-mckenney@rilegislature.gov
- **Secretary:** Sen. Jacob Bissaillon — sen-bissaillon@rilegislature.gov
- **Members:**
 - Sen. John P. Burke — sen-burke@rilegislature.gov
 - Sen. Andrew R. Dimitri — sen-dimitri@rilegislature.gov
 - Sen. Dawn Euer — sen-euer@rilegislature.gov
 - Sen. Thomas J. Paolino — sen-paolino@rilegislature.gov
 - Sen. Todd M. Patalano — sen-patalano@rilegislature.gov
 - Sen. Ana B. Quezada — sen-quezada@rilegislature.gov
 - Sen. Leonidas P. Raptakis — sen-raptakis@rilegislature.gov

Clerk: Adriana Carlucci — slegislation@rilegislature.gov

Re: S. 2487 — Digital Electronics Right to Repair Act — Opposed Unless Amended

Dear Chair LaMountain, Vice Chair McKenney, and Members of the Senate Judiciary Committee:

For the record, my name is Mark Johnson, and I am the owner of Howard Johnson Incorporated in South Kingstown, Rhode Island. We employ 12 Rhode Islanders and support customers across agriculture, construction, turf/outdoor power and related non-road markets. We support customers' right to repair; however, we oppose S. 2487 unless it is amended as described below.

1) Creates channel conflict and undermines local parts availability

S. 2487 compels manufacturers to provide documentation, parts, and tools “on fair and reasonable terms,” with documentation and many tools at no charge, and it restricts the use of authorization/Internet access for the operation of tools. That combination effectively grants most-favored access to non-authorized providers, inserts the state into pricing and distribution, and destabilizes the authorized dealer channel that invests in local inventory, certified technicians, service trucks, and facilities. The foreseeable result is reduced local stocking and longer downtime for customers—especially during critical seasons. Furthermore, no-charge requirements create OEM–dealer channel conflict and impair the economics that keep parts close to customers.

2) May enable tampering and weaken equipment safeguards

S. 2487 restricts “parts pairing” and similar integrity checks, and limits the use of authorization or Internet access for tools—technologies manufacturers use to ensure that repairs restore equipment to OEM specifications rather than enable tampering. Weakening these protections increases the likelihood that equipment returns to service with compromised safety, environmental, or anti-theft systems, exposing operators, bystanders, communities, and secondary buyers to elevated risk.

3) Scope alignment — adopt the explicit non-road (off-road) exemption

As drafted, S. 2487 applies broadly to “digital electronic equipment” and does not differentiate complex non-road/off-road equipment from consumer electronics. Dealers routinely serve multiple segments, and applying a consumer-electronics framework to non-road machines creates cross-sector pricing conflicts for identical parts, legal uncertainty, and administrative burdens without improving access for owners who already use established market channels.

We respectfully request a clear, comprehensive non-road exclusion to avoid cross-sector confusion and preserve customer support practices tailored to these machines. Specifically, we request the inclusion of the following non-road exemption:

“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), standalone 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.”

Rhode Island equipment dealers support repair access. S. 2487’s prescriptive “fair and reasonable” access, no-charge mandates, and restrictions on technologies used to ensure safe repairs would disrupt parts distribution, inject pricing uncertainty, and weaken safeguards—without improving repair outcomes. **With the inclusion of the non-road exemption above, our industry would be neutral on S. 2487; without it, we must oppose the bill.**

Thank you for your consideration. We would welcome the opportunity to demonstrate the current repair resources available to Rhode Island customers and to work with the Committee on tailored language that protects access and safety.

Respectfully submitted,

Mark R Johnson

Owner

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