



June 13, 2017

The Honorable Michael Barrett
The Honorable Thomas A. Golden Jr.
Joint Committee on Telecommunications, Utilities & Energy
State House
Boston, MA 02133

Re: Proposed Internet Privacy Legislation

Dear Chairman Barrett, Chairman Golden and members of the Committee:

As organizations representing small and large employers from diverse industry sectors in every region of the Commonwealth, we appreciate this opportunity to express significant concerns with recent state legislative proposals governing Internet privacy. We fully support a consistent, thoughtful and comprehensive approach to safeguarding consumers' privacy and sensitive information and individual state legislation in this area will undermine this approach.

We note the following for your consideration:

1) Promote Consistent Federal Framework:

Massachusetts consumers will be best served by a consistent privacy framework applicable to the full Internet ecosystem. The Federal Trade Commission (FTC) privacy framework—which still applies to the full Internet ecosystem other than ISPs—provides a comprehensive approach to protecting consumers' privacy and security. Internet Service Providers (ISPs) have committed to a set of principles consistent with this successful framework and the Federal Communication Commission's statutory requirements are in place. Thus, state legislation in this area is unnecessary. Massachusetts can play an important leadership role to champion a uniform approach to privacy at the Federal level. Lawmakers should resist the urge to hastily adopt Massachusetts-only laws that may be well-intentioned but may cause significant unintended consequences to our innovation ecosystem and economic competitiveness.

2) Pursue Collaborative, Comprehensive Approach:

The business community in Massachusetts recognizes and supports the important interest in protecting Internet privacy and remains committed to working collaboratively with policy makers to address privacy concerns. Such complex issues cutting across technologies, products and industries, while impacting nearly every business and every home in the Commonwealth, deserve public discussion and thorough attention to detail.

3) Protect Against Unintended Impacts on the Innovation Economy:

According to the most recent data from the MassTech Collaborative, there are more than 1.2 million people working in innovation-based industry sectors such as hardware, software, life sciences and defense manufacturing. The reach of the Internet does not stop at the state's borders. Companies operating in multiple states and countries must be able to rely on a consistent set of standards. Business fully supports strong consumer protections and stands ready to work with policy makers in a collaborative effort to safeguard citizens as new technologies and products connect us and our

devices in ever more imaginative ways. The speed and complexity of innovation demands a thoughtful public discourse that protects privacy and creates a level playing field throughout our delicate ecosystem.

The FTC and the FCC are working together to create a national privacy framework across all companies in the Internet ecosystem. In an effort to avoid a patchwork of legislation and in order to ensure regulatory consistency for the industry balanced with necessary and appropriate protections for consumers, we urge that the Committee refrain from action on this complex issue at this time. We look forward to working with you to ensure that consumer privacy is protected and that our innovation-based economy remains a global leader. Thank you for your consideration and leadership on this important policy matter.

Sincerely,



Carolyn Ryan
Senior Vice President, Policy & Research
Greater Boston Chamber of Commerce



John R. Regan
Executive Vice President, Government Affairs
Associated Industries of Massachusetts



Christopher Kealey
Deputy Director
Massachusetts Business Roundtable