From: [redacted]
To: House Community and Regional Affairs
Cc: [redacted]
Subject: Re: HB 162 comments
Date: Thursday, April 16, 2026 11:50:05 AM

I'm sending a link to American Farm Bureau's right to repair issues page. At the bottom are MOUs American Farm Bureau has with equipment manufacturers. There is also a link just above the MOUs where someone can file a complaint if they are having issues with a manufacturer.

https://www.fb.org/issue/right-to-repair

2025 John Deere announced its Operations Center Pro Service which expands access to digital tools for equipment beyond what was available through the Advisor tool referenced in the MOU. So, they are still expanding access to products.

https://www.deere.com/en/technology-products/operations-center-pro-service/

A big issue for Alaska's farmers is needing real support to grow the industry so dealers, independent repair shops and parts stores have more of the parts our farmers need on hand so it's easier to get the parts quickly. Also need more technicians around the state who know how to fix ag equipment. Right to Repair laws don't solve those problems.

Let me know if additional information would be helpful.
Thank you,
Amy Seitz, Policy Director
Alaska Farm Bureau

1919 S. Eads St.
Arlington, VA 22202
703-907-7600
CTA.tech

April 10, 2026

Representative Rebecca Himschoot, Co-Chair
Representative Donna Mears, Co-Chair
House Community and Regional Affairs Committee
120 4th Street
Juneau, AK 99801

Re: CTA Testimony to HB162

Chair Himschoot, Chair Mears and Members of the House Community and Regional Affairs Committee:

On behalf of the Consumer Technology Association (CTA), thank you for the opportunity to provide testimony to House Bill 162 (HB162), Digital Product Repair.

CTA is the trade association representing the U.S. consumer technology industry. Our members are the world's leading innovators – from startups to global brands to retailers – helping support more than 18 million American consumer technology jobs. Our members include manufacturers of the devices subject to the provisions of this legislation. CTA has concerns with HB162 which includes broad and vague language, and it extremely misaligned with industry's stance on repair.

Patchwork Concerns
Given eight states have enacted repair legislation, CTA is concerned about a patchwork of varying repair requirements emerging across the United States. CTA supports a national repair approach that will ensure that consumers and independent repair providers receive the same or equivalent treatment as manufacturer-authorized repair providers for purposes of repairing consumer technology devices. CTA also stands ready to work with repair advocates to establish a national Memorandum of Understanding to facilitate repair nationally.

Enactment of varying state repair laws with different requirements and definitions subject to differing interpretations by state courts and regulators is a major concern for our industry. **We strongly encourage Alaska to not move forward with HB162 given its broad and vague language as well as the drastic differences between the language in HB162 and existing state laws.**

Concerns Specific to HB162
CTA has identified several areas of concern for members where the language will create confusion for producers and/or doesn't ensure reasonable accommodation for industry that other states have recognized and put into law while ensuring both that repairs can be made by consumers and independent repair shops without substantially compromising safety and security concerns.

Enforcement Mechanisms
CTA's top concern on HB162 relates to the potential to cause significant harm to industry. Private right of action exists under Alaska state law and would be applicable to this law if adopted, enabling

consumers to file private lawsuits against manufacturers. No state repair law adopted to date allows for private right of action. Repair laws should focus on increasing access to repair options for consumers; not increasing litigation costs for manufacturers or putting companies at risk of inconsistent interpretations of laws across jurisdictions. Limited enforcement mechanisms should be given solely to the Alaska Attorney General in line with current repair laws across the U.S.

Definitions
There are a multitude of unique and Alaska specific definitions in HB162. The definition of "digital product" is extremely broad and raises the following concerns:

- It captures a multitude of products including critical infrastructure devices (electric grid, networking equipment, etc.) and devices that could present a security risk if information on how to access is provided.
- Per Alaska definitions, "persons" includes businesses. Sales to businesses or government entities should not be in scope of this legislation.
- Lastly, there is no grace period for new products to come into compliance, which should be at least one year from passage of the legislation and should apply to products first sold or leased in Alaska on the date of applicability.

These parameters are critical and have significant trickle impacts when you look at the full scope of requirements laid out in HB162.

Fair and Reasonable Terms
Documentation, tools, and parts should only be required to be provided to independent repair providers or consumers based on fair and reasonable terms and if the documentation, tools, and parts are provided to authorized repair providers. This ensures that manufacturers aren't required to provide documentation, tools, or parts beyond what they provide their trusted and vetted authorized repair providers. The lack of reference to fair and reasonable terms is also concerning which provides reasonable accommodation to manufacturers.

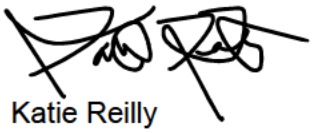
Consumer Protection
Additionally, HB162 fails consumers. Consumers aren't protected in this legislation. Consumers should be provided with basic information about the repair provider and parts provided by the independent repair provider, and such independent repair provider should be required to protect consumer data and recycle responsibly. If the main point of this legislation is to expand consumer rights, there should be a concurrent expansion of disclosure to consumers of who is doing the repair.

The above challenges are just some of the examples we see in HB162. Most repair bills focus on providing consumers with options to repair their products; HB162 goes far beyond the typical consumer products in scope of these proposals and does little to provide reasonable accommodation for manufacturers which have invested heavily in supporting consumers as well as independent and authorized repair providers.

Conclusion:
Given the multiple concerns outlined above, we strongly encourage Alaska not to move forward with HB162. Our concern is that variations in these nuanced provisions among state laws will be a field day for attorneys (especially with private right of action) and move the center of energy away from expanding repair and into prolonged court battles. CTA has developed model legislation on repair in conjunction with TechNet. We would welcome the opportunity to discuss this language as a path forward for repair in Alaska.

Thank you again for the opportunity to testify. If you should have any questions, please do not hesitate to contact me at kreilly@cta.tech.

Sincerely,



Katie Reilly
VP, Environmental Affairs and Industry Sustainability
Consumer Technology Association

April 17, 2026

The Honorable Rebecca Himschoot
Co-Chair
House Community and Regional Affairs Committee
Alaska State Legislature

The Honorable Donna Mears
Co-Chair
House Community and Regional Affairs Committee
Alaska State Legislature

Dear Co-Chair Himschoot, Co-Chair Mears, and Members of the Committee:

On behalf of the National Marine Manufacturers Association (NMMA), I write to express our concerns with H.B. 162, Digital Product Repair, as currently drafted.

NMMA represents nearly 1,300 recreational marine businesses, including boat, engine, and accessory manufacturers, many of which are small, family-owned operations. The recreational boating industry plays a meaningful role in Alaska's outdoor recreation economy, supporting over 3,000 jobs, over 300 local businesses, and access to the state's waterways.

While we appreciate the intent of H.B. 162 to expand consumer access to repair, we are concerned that the bill does not adequately account for the federal regulatory framework governing marine engines and related components. The Clean Air Act imposes strict requirements on manufacturers to prevent tampering with emissions control systems. Marine engine manufacturers are legally obligated to restrict access to certain software and systems to ensure compliance with federal emissions standards throughout the life of the product.

As drafted, H.B. 162 could require manufacturers to provide access to tools, software, and systems in a manner that conflicts with these federal obligations. This creates a risk of placing manufacturers in the position of choosing between compliance with state law and adherence to federal environmental requirements.

For this reason, NMMA respectfully requests that H.B. 162 be amended to explicitly accommodate the mandates of the Clean Air Act as they pertain to marine vessels and their components. At a minimum, the legislation should include clear language ensuring that marine manufacturers are not required to provide access to emissions-related systems or any functionality that could enable tampering or noncompliance with federal law.

If such amendments cannot be incorporated at this time, we respectfully urge the Committee to consider withholding further action on the bill until these concerns can be addressed. This approach will help protect Alaska's marine industry while maintaining the state's commitment to environmental stewardship and consumer safety.

NMMA remains committed to working collaboratively with the Committee and stakeholders to identify a balanced approach that supports repair access while preserving safety, compliance, and the integrity of marine products.

Thank you for your time and consideration.

Sincerely,

Emily Villanueva
Manager, Western Government Relations
National Marine Manufacturers Association

ASSOCIATION OF HOME APPLIANCE MANUFACTURERS

1111 19TH STREET NW | SUITE 1150
WASHINGTON, DC 20036
AHAM.ORG

TESTIMONY

JOHN KEANE
MANAGER OF GOVERNMENT RELATIONS

ON BEHALF OF
THE ASSOCIATION OF HOME APPLIANCE MANUFACTURERS

BEFORE THE ALASKA STATE LEGISLATURE
HOUSE COMMITEE ON COMMUNITY & REGIONAL AFFAIRS

HEARING
HB 162
DIGITAL RIGHT TO REPAIR ACT

MARCH 16, 2026

Co-Chair Himschoot, Co-Chair Mears and members of the Committee, thank you for the opportunity to share the view points of the home appliance manufacturing industry regarding the potential impacts of the concept of right to repair, HB 162.

AHAM represents manufacturers of major, portable and floor care home appliances, and suppliers to the industry. AHAM's membership includes over 150 companies throughout the world. AHAM members employ tens of thousands of people and produce more than 95% of the household appliances that are shipped for sale within the United States. The home appliance industry, through its products and innovation, is essential to consumer lifestyle, health, safety and convenience. Home appliances also are a success story in terms of energy efficiency and environmental protection. The purchase of new appliances often represents the most effective choice a consumer can make to reduce home energy use and costs.

AHAM believes that so-called "Right to Repair" concepts that are part of HB 162 are overly broad. A basic reading of the definition of "Digital Product" can be interpreted to include the home appliance industry and, therefore, raises serious questions that AHAM strongly urges the Committee to carefully consider.

Home appliance manufacturers know how much consumers rely on their products to make their lives easier and more comfortable. Thus, manufacturers work hard to make appliances that last longer and perform better and to ensure their customers are satisfied not only at the time of purchase, but throughout a product's useful lifetime. Accordingly, manufacturers have a vested interest in ensuring repairs are accessible, reliable, and safe. This includes ensuring that consumers have access to highly educated, trained and certified repair technicians.

Home appliance manufacturers not only ensure that authorized repair providers are properly trained and certified, manufacturers also take necessary precautions so that when a repair provider enters a private home that the home owner as well as the property are safe and secure. The fact that repair providers enter consumers' homes to conduct appliance repairs presents a different set of circumstances regarding the repair of digital electronic equipment.

HB 162 comes into conflict with important industry doctrines:

Safety

Safety is a top priority for AHAM members. The industry designs appliances that are as safe as they are useful and consumers recognize this commitment. Today there are more than 860 million appliances in use largely without incident and 93 percent of consumers believe home appliance manufacturers do a good job in providing safe and quality appliances. Moreover, another 85 percent understand that safety policy is a top priority for the industry. For that reason, repairs that present safety risks are the exception to the general rule that materials needed for home appliance repair can easily be obtained by contacting the manufacturer or visiting the manufacturer's website, depending on the complexity of the repair. The primary reason that HB 162 is of concern to the home appliance industry is the broad safety concerns presented by the legislation. There

are three principal safety concerns that these bills present: product safety, consumer safety and property safety.

Product Safety

HB 162 requires that manufacturers make all diagnostic and repair documentation available to independent third parties or equipment owners. Today, home appliances contain highly advanced operating systems that use high currents of electricity, gas, flammable substances, high speed motors, and have hermetically sealed systems that can come into contact with water and moisture. Product and consumer safety are top of mind for home appliance manufacturers. Available service and repair options are, therefore, dependent not only on the type of product but also on the qualifications necessary to perform the particular repair.

Manufacturers develop diagnostic tools for certified engineers who have the educational and technical background and training necessary to troubleshoot, diagnose and conduct repairs to the appliance. A right to repair concept would broadly expand the universe of technicians that could access diagnostic tools and information. Also, manufacturer authorized servicers are typically required to perform repairs with manufacturer authorized parts that have been tested and qualified to meet the reliability and safety requirements of the home appliance product. Opening up the repair process to any third party services will loosen the control in this area significantly and could have a considerable impact on the safety and reliability of the product. In addition, manufacturers control the software used for service technicians. Without proper training, significant damage to the appliance and the home can occur if these tools are improperly used.

Because appliances operate using electricity, gas, water, filtered air, flammable substances, and high-speed motors, they undergo vigorous safety testing to ensure they meet applicable safety standards. Furthermore, appliances are designed to be in compliance with electrical, building, and plumbing codes as well as clean air and radiation emitting device regulations. It is critical that repairs do not jeopardize compliance with applicable safety and other standards, codes, and regulations.

Most appliance products are required by National Electric Code as well as other applicable building/mechanical codes to be listed or certified under applicable North American Safety Standards (such as Underwriter Laboratories or UL standard). These safety standards ensure a product and all of its components will operate in a safe and reliable manner. Right to Repair evades many of the safety provisions that Underwriters Laboratory (UL) and others test against.

For example:

<u>Underwriters Laboratory North American Dryer Safety Standard (UL2158/CSA 22.2 no. 158)</u>

This UL safety standard has safety requirements such as motor overload protection, door/lid opening or temperature limiting. These requirements were put in place to mitigate risks of electrical shock, injury or fire. Manufacturers often design the electronic controls which are embedded into either hardware or software and often both work together systematically to ensure the system operates safely and meets the UL requirements. To ensure the safety critical

functionalities are reliable, both the hardware and software of these controls are certified to applicable safety standards (i.e. UL60730 or UL60335 or specific requirements of the product safety standard). These standards have rigorous requirements to test and validate the required safeguards. The standards are stringent to the point that any design or manufacturing changes to these components by a manufacturer often requires recertification by a Nationally Recognized Testing Laboratory (NRTL) to the applicable standard in order to ensure that the required safety functionality has not been compromised.

Underwriters Laboratory (UL) North American Washer Safety Standard (UL2157/CSA 22.2 no 169)
High efficiency (HE) washers employ electronic lid switches to ensure that no one can access the rotating basket while it is spinning very fast. These switches are often controlled by the Electronic control, which monitors the lid switch signal and employs a braking mechanism to stop the basket from spinning if a user opens the lid. The same components are also utilized for other functional and safety requirements. Diagnosing and repairing a similar HE washing machine requires an in-depth understanding of the full system which authorized servicers are given as part of their training. An untrained servicer may employ a repair using a non-OEM part or incorrect connections can compromise the whole system that may result in a potential safety issue and/or performance degradation.

Notably, many certifications are required by state / province regulations, as well as applicable Federal laws. Accordingly, any professional servicer must meet these requirements. Thus, they do not present a barrier to becoming authorized. Manufacturers simply ensure their affiliated servicers meet the applicable requirements, giving consumers further peace of mind that their repairs will be conducted safely and correctly. Below is a summary of typical required certifications:

Certification	Description
EPA Section 608 Technician Certification	Section 608 of the Clean Air Act requires certification for technicians who maintain, service, repair, or dispose of equipment that could release ozone-depleting refrigerants into the atmosphere
North American Technician Excellence Certification (NATE)	Certification for handling heating, ventilation, air conditioning and refrigeration (HVACR) technicians
National Appliance Service Technician Certification (NASTec) (International Society of Certified Electronics Technicians (ISTEC))	NASTeC is a voluntary national certification program for technicians who service major home appliances.
Red Seal Program (Canada)	The Red Seal, when affixed to a provincial or territorial trade certificate, indicates that a tradesperson has demonstrated the

	knowledge required for the national standard in that trade

Today, modern appliances contain sophisticated and technologically advanced electronics and internal controls that are uniquely designed and programmed for specific products. These electronics and internal controls contain safety features (both software and hardware) that are relied upon for the safe operation of the appliance. Manufacturers often invest substantial resources to ensure diagnostic tools are impervious to failure and tampering by the manufacturers own agents, the manufacturer will employ software and Information Technology tools specific to its agents to guarantee the service. The same cannot be ensured once these tools are opened up to unaffiliated third party servicers. It could be detrimental to the inherent safety of the appliance if access were to be granted in the public domain where defeating any of these features (either intentionally or inadvertently) could happen during diagnostics and repair, which could then create potential safety hazards to the consumer. The repercussions not only jeopardize the life of the product but may also leave the consumer worse off than before either with a new malfunction or a product rendered unsafe due to a repair conducted improperly or with the wrong parts.

For example, the home appliances industry is constantly innovating and advancing our products in order to deliver optimum solutions to consumers, which are energy efficient and continually better for the environment. Newer refrigerant gases that are non-ozone depleting and have very low global warming potential are an example. Comprehensive training is required in order for a technician to handle and conduct repairs on systems that contain different types of refrigerant. Mixing refrigerant types can be problematic and dangerous. An older product designed to operate with R134a gas refrigerant does not have the appropriately designed relays and electrical mechanical components for the newer R600a refrigerant. R600a gas is a flammable refrigerant gas that has positive attributes to reduce climate change and has started to be added to new refrigeration products in the U.S. market. It is critical that technicians are properly trained to identify which product utilizes which gas and how the gas is properly handled to ensure the utmost safety.

Authorized servicers can be directly trained and tools provided to 1) allow technicians to understand the systems included on every model and 2) repair those products appropriately. The same concerns hold true for the manipulation of LPG and natural gas in cooking products, dryers and water lines and the appropriate manipulation of 110V and 220V electrical connections. If not properly installed, leaks and overheating can occur.

Property Safety

Appliance repairs when not performed correctly can be the cause of property damage, e.g., flooding and fires. Insurance claims as well as increases in homeowner's insurance premiums could result if independent third parties improperly perform in-home repairs. Additionally, in the event of significant property damage and/or personal injury, the manufacturer could face legal claims.

Manufacturers, in general, have process and procedures in place that track repairs completed through their servicer network. This allows the manufacturer to create traceability of repairs for their customers/consumers and is one of the critical factors if fire or another sort of property damage were to occur. Opening up this domain to third-party servicers, inhibits the ability for manufacturers to track any repairs made to home appliance products and has the potential to create issues in determining liability if the source of the repairs cannot be readily identified. Traceability is also important because improper repair or servicing can be a cause of appliance fires. Finally, this assists insurance companies and other entities if the incident requires investigation.

Consumer Safety

The nature of appliance repairs requires repair technicians to enter the homes of consumers. In-home safety and security is of paramount importance to appliance manufacturers and we assume the same holds true for independent service technicians. Manufacturers who certify technicians may require extensive background checks as well as drug screening, and as previously mentioned technical and safety training. AHAM members identified two areas in which a repair business must be in good standing to earn affiliation, both equally critical. These include (1) business requirements, and (2) business capacity to support the affiliated brands. These requirements are detailed further in the below tables.

Business Requirements			
Manufacturer / brand certification course State / provincial / federal certifications for all technicians	Proof of insurance (liability, workers compensation), Better Business Bureau accredited	Annual user / service agreement for certification	Business License Tax ID Personnel background checks Business credit check

Conclusion

Thank you for the opportunity to present this written statement to the hearing record. Right to Repair concepts raise serious safety, cyber-security and contractual concerns for the home appliance manufacturing industry. AHAM strongly urges that this Committee reconsider whether or not legislation is in the best interests of Alaska consumers.

1812 N. Moore Street, Suite 2200
Arlington, VA 22209
703.841.3200

April 14, 2025

Testimony of Mark Ourada
Director, State Government Affairs
National Electrical Manufacturers Association (NEMA)

Before the Alaska House Community & Regional Affairs Committee

In Opposition to HB162:
Right to Repair Legislation

Chair Himschoot and Committee, my name is Mark Ourada, and I am Director of Government Affairs for the National Electrical Manufacturers association.

NEMA represents the interests of over 300 leading manufacturers in the *Electroindustry*. In Alaska, the electroindustry supports over 228 jobs with labor income of $20 million.

Most all Right-to-Repair bills across the country are aimed at 'consumer electronic products' ensuring that individuals can repair phones, computers, and other personal electronic devices. Indeed, this legislation amends the Alaska Unfair Trade Practices and CONSUMRER PROTECTION ACT.

Therefore, if the author's intention is to focus on consumers it would be extremely appropriate to be clear that this legislation is not intended to affect 'business to business' or 'business to government' transactions.

NEMA is also suggesting language that would prevent *indirect* disclosure of trade secrets through access to firmware, imbedded in so many products, encryption keys, diagnostic tools, or similar mechanisms by adding language in the "Trade Secret" definition:
or provide any means by which a trade secret could be ascertained or indirectly disclosed.

This legislation also puts intellectual property at risk that companies spend years and significant amounts of money and labor to innovate, develop and manufacture.

There is a strong precedent set by the National Electrical Code (NEC) *against* repairability of lighting products, stating that "Reconditioned luminaires, lamp holders, ballasts, LED drivers, lamps, and retrofit kits shall not be permitted." Lighting products are already designed for replaceability of certain components where safe to do so.

Including the following language will avoid any confusion: *"Nothing in this bill shall be construed to require an original equipment manufacturer to provide parts, tools or documentation for any product where reconditioning or repair of the product is prohibited by law, regulation, or building or electrical code, or where doing so will create the potential for an unsafe operating condition."*

NEMA is committed to working with you to ensure consumers have access to repairs and ensure that their privacy, safety, and security are protected. For the reasons outlined in this testimony, NEMA is in opposition to HB162 in its current form and asks the committee to take a careful look at the suggestions we have made.

Thank you for your time and attention.

Mark Ourada - Director, State Government Affairs
The National Electrical Manufactures Association

April 16, 2026

The Honorable Rebecca Himschoot, Co-Chair
The Honorable Donna Mears, Co-Chair
Members Alaska House Community & Regional Affairs Committee

Re: Alarm Industry Support for CS Version T of HB 162 with Further Changes Needed

Dear Co-Chairs Himschoot and Mears and Committee Members:

On behalf of the Alarm Industry Communications Committee (AICC), we are writing to express our gratitude to members of the House Community & Regional Affairs Committee, and to others who involved in preparing the Committee Substitute (CS) Version T of HB 162, for including language to exempt security and life safety systems and physical access control equipment from the requirements of Alaska's Digital Right-to-Repair Act. AICC believes the amendment language will go a long way to protect Alaskans who rely on these hazard-critical systems and devices for protection of their homes and businesses.

At the same time, AICC members are concerned that the revised language, however helpful, leaves a hole for intrusion alarm systems that are not monitored, even though disclosures about such equipment may compromise similar systems that are monitored. This situation can foreseeably arise when security systems are left installed in a home after a monitoring customer moves or cancels service. As a result, the same type of system that is used in monitored homes would no longer be monitored, and the security and life safety systems and devices that the Committee has sought to protect would become subject to right-to-repair obligations.

To close this loophole and avoid unintended consequences, AICC respectfully requests that Section (a)(3)(B) of AS 45.45.895 be revised as follows:

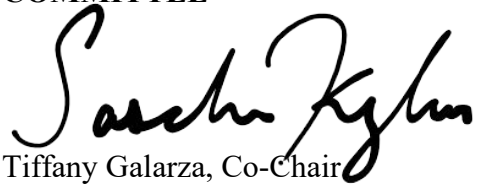
(3) a digital product that is

(B) a physical intrusion detection system monitored or designed to be monitored by a person providing a security service; or

AICC appreciates the Committee's thoughtful consideration of this issue and stand ready to serve as a resource as you continue your deliberations.

Respectfully submitted,

ALARM INDUSTRY COMMUNICATIONS COMMITTEE



Tiffany Galarza, Co-Chair
Sascha Kylau, Co-Chair
c/o The Monitoring Association
7918 Jones Branch Drive, Suite 510
McLean, VA 22102
703-242-4670
www.tma.us

cc: Rep. Maxine Dibert (Sponsor, HB 162)