

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



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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,

A handwritten signature in black ink, appearing to read 'Katie Reilly', with a long horizontal stroke extending to the right.

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



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AHAM.ORG

TESTIMONY

JOHN KEANE
MANAGER OF GOVERNMENT RELATIONS

ON BEHALF OF
THE ASSOCIATION OF HOME APPLIANCE MANUFACTURERS

BEFORE THE ALASKA STATE LEGISLATURE
HOUSE COMMITTEE 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:

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

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
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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.



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

Scott Mugrage, President
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Camron King, Executive Director
cking@alaskafb.org

April 14, 2025

Re: House Bill 162 Digital Product Repair

Co-Chairs Himschoot and Mears:

Alaska Farm Bureau is the state's largest grassroots agricultural organization with a focus on advocating for policies that help build a strong agriculture industry to benefit Alaskans. Right to repair has been an important issue to our farmers and ranchers for years. Having equipment break down is a major disruption to the operation, with our vast state, it is not always feasible to get the equipment to an authorized dealer. It is so important for farmers and independent repair facilities to have access to error codes, specialty tools and information on how to fix problems. A private-sector solution to the right to repair is the best option, instead of relying on legislative or regulatory action.

American Farm Bureau Federation (AFBF) and five agriculture equipment manufacturers have entered into MOUs ensuring farmers' and ranchers' right to repair their tractors and other implements. These five manufacturers represent roughly three-quarters of the U.S. market for agricultural machinery. The MOUs have allowed intellectual property protection for the manufacturers, while giving farmers, ranchers the ability to make reasonable repairs without the cost of hauling equipment long distances. The MOUs provide access to:

- Diagnostic and repair codes and their meaning
- Manuals (Operator, Parts, Service)
- Product Guides
- Directly purchase diagnostic tools from the manufacturers
- Assistance from the manufacturers when ordering parts and products

Through the MOUs, there is a direct path for all farmers and ranchers to reach manufacturers, to report and find a quick resolution to any repair issues that may arise. The private-sector solution also allows for a quick response to any necessary changes to further enhance the right to repair. AFBF and manufacturers hold regular meetings to review and update as needed.

Alaska Farm Bureau respectfully asks the House Community and Regional Affairs Committee to allow these agreements to prove themselves and let them serve as a model for other manufacturers. This private-sector solution will better serve farmers, ranchers and independent repair shops than a fragmented system of varying state to state right to repair legislation.

Respectfully,

A handwritten signature in cursive script that reads "Scott Mugrage".

Scott Mugrage, President
Alaska Farm Bureau



HB 162 Statement of Opposition

The Papé Group, Inc., based in Eugene, Oregon, operates a full offering of capital equipment dealerships in the western United States. Papé Machinery, Papé Kenworth, Papé Material Handling, Ditch Witch West, and Engineered Products, represent manufacturers including John Deere, Kenworth, Hyster/Yale, Ditch Witch and many allied manufacturers in support of the construction, agriculture, forestry, trucking, and warehousing/material handling industries.

Papé supports our Alaskan customers through our Ditch Witch utility equipment, Hyster/Yale forklift, and Kenworth truck dealerships in Anchorage and Fairbanks.

The proposed legislation has far-reaching unintended consequences for customer service, safety and environmental impact when applied to utility, construction, agriculture, warehousing, and aerial reach equipment.

Dealers, by definition, are wholesalers. The dealer business model serves the fulfillment needs of large multi-national manufacturers within defined territories. As such, these manufacturers enforce high standards relating to carrying their parts and whole goods, training, and customer support. It is unreasonable to legislate that manufacturers provide the same wholesale pricing to independent repair providers and customers that do not have the same obligations as the manufacturers' dealer network. Every business needs to pay their bills and mandating that parts be sold directly at wholesale prices would cause irreparable financial damage to the dealer network and to Alaskans that rely on this support.

As a dealer, we support our customers' ability to repair their own equipment. Alongside our

manufacturers, we currently provide manuals, tools, diagnostic equipment, software updates, specialized training and technical assistance to our customers. Nevertheless, we are concerned that allowing third parties to modify the digital operating parameters could lead to unsafe operating conditions or violations under the Clean Air Act.

The manufacturers we support use digital electronics to ensure that their machinery safely operates within engineering specifications. They need to ensure these safe operating ranges. Giving unfettered access could subject operators and bystanders to hazardous operating conditions and unsafe worksites. Imagine an untrained technician resetting the load parameters of a forklift that is expected to safely load and unload racking at heights of over 30 feet. Misunderstanding these parameters could have fatal consequences.

The ability to meet required environmental standards is also designed into the digital electronic equipment that interfaces between the operator and the engine. Allowing anyone, other than approved manufacturer representatives, to make changes (or reset fault codes) within the underlying software would allow third parties to defeat the very technologies required to comply with Federal and State environmental laws.

We believe firmly that HB 162 should extend the exclusion, already provided for motor vehicles, to also exclude off-road vehicles and equipment such as warehousing, utility, farm equipment, construction equipment, other off-road equipment and trucks, and stationary engines.

Jordan Papé
President and CEO
The Papé Group, Inc.

April 8, 2026

VIA E-MAIL

House Community & Regional Affairs Committee
Alaska House of Representatives
Alaska State Capitol
120 4th Street
Juneau, AK 99801

Re: Opposition Unless Amended to Alaska HB 162

Co-Chairs Himschoot and Mears and Members of the House Community & Regional Affairs Committee:

The Truck and Engine Manufacturers Association (EMA) opposes AK HB 162, and testified in opposition to its companion bill AK SB 111. While the legislation is described as a Digital Right to Repair Bill, for which a Model State Bill is available to properly scope the legislation to apply to personal consumer electronic devices, HB 162 is rather, a broad bill that attempts to apply the right to repair concept to a myriad of commercial products for which a legislative solution is simply not needed and will create issues between owners, service providers and manufacturers and create new risks to public health and safety.

EMA represents the world's leading manufacturers of commercial vehicles as well as on- and off-road engines used in applications such as trucks; buses; construction and farm equipment; locomotives; marine vessels; landscaping equipment; and stationary generators.

While the proposed "Digital Right to Repair Act" might seem innocuous, in fact it would create significant adverse unintended consequences to the products manufactured by EMA's members, as such requirements would provide unfettered access to change the microprocessors on engines and equipment that control critical safety, emissions, and performance systems. Legislation enabling such access is potentially dangerous and simply is not needed. Manufacturers already provide access to the diagnostic, maintenance and repair information needed to repair the vast majority of repairs. Manufacturers have programs available in which daily, weekly, monthly and yearly information can be provided to independent repair facilities and owners. In addition, it appears to prohibit manufacturers from charging for diagnostic, maintenance and repair documentation and software – essentially requiring manufacturers to give away technology which they have spent significant resources to develop.

EMA member products and the engines they power are often used in rural and remote settings. As a result, over the decades manufacturers have established a service network which includes independent dealers and owners/operators to help keep these vehicles and equipment working. EMA met with the Sponsor to better understand the issues he is attempting to address

with this bill. While we certainly understand some of the frustrations expressed by Senator Dunbar, the Sponsor of SB 111, some of the issues raised by the Senator in the Senate hearing are simply driven by geography and found in a wide range of service industries ranging from mail delivery to medical and emergency services. The bill does not resolve the challenge created by geography - it is simply expensive and logistically challenging to provide parts and services in rural and remote settings.

The major manufacturers of agricultural equipment entered a Memorandum of Understanding with the American Farm Bureau Federation in 2023 which documents the arrangement under which access will be provided and the obligations and responsibilities of the signatories. Importantly, there is a continuing commitment to meet on a regular basis to assess the MOU and update it based on operational concerns or technological advancements. The parties to the MOU have met 4 times since its inception to review and update the implementation details. In addition, there is a public website on which ANY owner/operator may file a complaint and, to date, few complaints have been filed. Those that have been filed have been quickly resolved. These are clear indications that the MOU is working to make legislation unnecessary.

Repairing large, complex, and specialized products manufactured by EMA members require highly trained and skilled personnel, who are qualified to properly use service and repair information. Allowing untrained individuals and the public to have unfettered access to service information is dangerous and unnecessary. Further, it will undermine the integrity of the equipment and allow for safety features on agricultural equipment – such as braking systems and electronic stability (anti-rollover) controls – to be altered and compromised. Unfettered access also will increase the likelihood that untrained personnel will intentionally or unintentionally, and illegally, alter or disable federally mandated emission control systems. Such illegal tampering is increasingly occurring today, especially on off-highway equipment. Tampering contributes substantial excess pollution that harms public health and air quality. The U.S. EPA has undertaken a National Compliance Initiative to respond to the numerous instances of engine tampering across the country, some of which include the use of software to alter or disable digitally controlled emission technologies. Further, a listing of those cases that have been resolved is also available on EPA's website. In addition to safety and emissions concerns, allowing access to software that controls federally regulated systems also exposes owners and operators to both civil and criminal liability for tampering. The U.S. Department of Justice's Energy and Natural Resources Division announced a consent decree and settlement of one such case, resulting in \$3.1 million in criminal fines and civil penalties for the sale of devices designed to delete emissions controls.

Further, proposed repair legislation consistently fails to contain meaningful safeguards or restrictions that would prevent or mitigate the risk of cybersecurity incidents. Widespread and unfettered access to service information increases the opportunity for hackers to improperly obtain or tamper with such information – creating enormous cybersecurity risks. Legislation to make those efforts easier is ill advised and unnecessary. The “open access platform” envisioned by the legislation simply does not exist. The cybersecurity risk and the risk associated with the broad ability to remotely access and send commands that control equipment critical safety systems has been recognized by federal agencies including the National Highway Traffic Safety Commission (NHTSA).

April 8, 2026

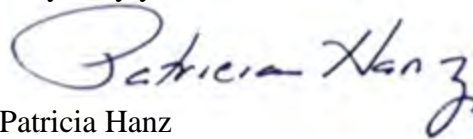
Page 3

EMA and its members support and have worked with regulatory agencies (including U.S. EPA) to develop programs to expand the availability of service and repair information to qualified independent service repair personnel. Those programs and regulations include safeguards and restrictions needed to mitigate the risk of the unfettered release of safety and emissions control tools and other proprietary information. Such regulations also provide the same set of requirements across the country, in contrast to legislation that would mandate special state-based requirements that, if enacted, would actually hurt Alaskan businesses.

For all these reasons, EMA has serious concerns with the proposed “Digital Right to Repair Act”. Such requirements otherwise will create enormous safety, environmental, and security risks and liability exposure for owners and the public and will limit the availability – and/or increase the costs – of products sold in Alaska, as those products will be forced to have unique characteristics.

Thank you for the opportunity to provide our Written Testimony. If you have any questions or need additional information, please do not hesitate to contact me at: phanz@emamail.org, (312) 929-1979.

Very truly yours,

A handwritten signature in blue ink that reads "Patricia Hanz". The signature is written in a cursive style with a large, looping initial "P".

Patricia Hanz

Attachment: Model Digital Equipment Bill

MODEL DIGITAL REPAIR BILL – CTA/TECHNET

Section 1. Definitions. For the purposes of this bill, the following terms shall have the following meanings:

- (a) “Authorized repair provider” means an individual or business who has an arrangement with the original equipment manufacturer, for a definite or indefinite period, under which the original equipment manufacturer grants to the individual or business a license to use a trade name, service mark, or other proprietary identifier for the purposes of offering the services of diagnosis, maintenance, or repair of digital electronic equipment, under the name of the original equipment manufacturer, or other arrangement with the original equipment manufacturer to offer such services on behalf of the original equipment manufacturer.
- (b) “Diagnosis” means the process of identifying the issue or issues that cause digital electronic equipment or equipment to not be in fully working order.
- (c) “Digital electronic equipment” means any hardware product that depends, in whole or in part, on digital electronics embedded in or attached to the product in order for the product to function, for which the original equipment manufacturer makes available tools, parts, and documentation to authorized repair providers
 - (i) “Digital electronic equipment” only includes items sold at retail for personal, household, family, or home office use, and does not include any product sold under a business-to-government or business-to-business contract that is not typically offered for sale directly by a retail seller.
 - (ii) “Digital electronic equipment” does not include:
 - (A) Information technology equipment that is intended for use in critical infrastructure as defined in 42 U.S.C. § 5195c(e).
 - (B) A motor vehicle manufacturer, manufacturer of motor vehicle equipment, or motor vehicle dealer acting in such capacity, or to any product or service of a motor vehicle manufacturer, manufacturer of motor vehicle equipment, or motor vehicle dealer acting in such capacity.
 - (C) A medical device, as defined in this section, or a digital electronic product found in a medical setting including diagnostic, monitoring, or control equipment or any product or service that they offer.
 - (D) A manufacturer, distributor, importer, or dealer of any off-road (non-road) equipment, including but not limited to, farm and utility tractors, farm implements, farm machinery, forestry equipment, industrial equipment, utility equipment, construction equipment, compact construction equipment, mining equipment, turf, yard and

garden equipment, outdoor power equipment (including portable generators), aviation, 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.

- (E) Commercial and industrial electrical equipment (including power distribution equipment, such as telecommunications network infrastructure, commercial visual display equipment, medium/low voltage switchgear and transformers, power control equipment, such as medium/low voltage motor control and drives, power quality equipment, such as uninterruptable power supplies, remote power panels, power distribution units and static/transfer switches) and any tools, technology, attachments, accessories, components, and repair parts for any of the foregoing.
- (F) An electronic bicycle manufacturer, distributor, importer, retailer, or dealer.
- (G) A home appliance that has a digital electronic product embedded within it, including, but not limited to, refrigerators, ovens, microwaves, air conditioning, heating units, motorized shades, lighting control systems, and security devices or alarm systems, including any related software and components.
- (H) Safety communications equipment, the intended use of which is for emergency response or prevention purposes by an emergency service organization, such as a police, fire, or medical and emergency rescue services agency.
- (I) [A video game console, and its components and peripherals].¹

(iii) “Digital electronic product” only includes products that have a wholesale price to the retailer, or to others outside of direct retail sale, of not less than fifty dollars (\$50).

(d) “Documentation” means any manual, diagram, reporting output, service code description, or similar kind of information, or its equivalent, required for effecting the services of diagnosis, maintenance, or repair of digital electronic equipment, and made available by the original equipment manufacturer to an authorized

¹ Some states (CA and MN) have incorporated an exclusion for video game consoles. CTA is neutral on an exclusion for video game consoles.

repair provider for the purpose of effecting the services of diagnosis, maintenance, or repair of digital electronic equipment manufactured or sold by the original equipment manufacturer.

- (e) “Fair and reasonable terms” means making available parts, tools, or documentation as follows:
 - (i) With respect to documentation required for repair, that such documentation is made available by the original equipment manufacturer on terms that are not conditioned on an arrangement described in section (1)(a) of this bill, and at no charge, except that, when the documentation is requested in physical printed form, a charge may be included for the reasonable actual costs of preparing and sending the copy.
 - (ii) With respect to tools, that such tools are made available by the original equipment manufacturer (i) on terms that are not conditioned on an arrangement described in section (1)(a) of this bill, and without any impediments that do not also apply to authorized repair providers to access or use the tool to diagnose, maintain, or repair digital electronic equipment using parts provided by the original equipment manufacturer, and (ii) at no charge for use or operation of such tool, or at costs that are equivalent to the lowest actual cost for which the original equipment manufacturer offers the tool to an authorized repair provider, including any discount, rebate, or other financial incentive offered to an authorized repair provider, and provided that when such tool is requested in physical form, a charge may be included for the reasonable, actual costs of procuring, preparing and sending such tool.
 - (iii) With respect to parts, that such parts are made available by the original equipment manufacturer, either directly or through an authorized distributor or repair provider, subject to the clarification in Section 2(d)(xii) of this bill that parts may be provided as pre-assembled components in certain circumstances, at reasonable costs and on terms under which an OEM offers the part to an authorized repair provider and that are not conditioned on an arrangement described in section (1)(a) of this bill.
 - (iv) Such parts tools, and documentation shall be made available on commercially reasonable terms that are fair to all parties, including the original equipment manufacturer and authorized repair providers.
- (f) “Independent repair provider” means an individual or business operating in this State, that does not have an arrangement described in section (1)(a) of this bill with an original equipment manufacturer, who is not affiliated with any individual or business who has such an arrangement, and who is engaged in the services of diagnosis, maintenance, or repair of digital electronic equipment.

- (g) “Maintenance” means any act necessary to keep currently working digital electronic equipment in fully working order.
- (h) “Medical device” means an instrument, apparatus, implement, machine, contrivance, implant, or other similar or related article, including a component part, or accessory, as defined in the federal Food, Drug, and Cosmetic Act, 21 U.S.C. § 321(h), which is intended for use in the diagnosis of disease or other conditions, or in the cure, mitigation, treatment, or prevention of disease, in humans or other animals.
- (i) “Modification” or “modify” means any alteration to digital electronic equipment that is not maintenance and not a repair.
- (j) “Motor vehicle” means a vehicle that is designed for transporting persons or property on a street or highway and is certified by the manufacturer under all applicable motor vehicle federal safety and emissions standards and requirements for distribution and sale in the United States.
- (k) "Motor vehicle dealer" means an individual or business who, in the ordinary course of business, is engaged in the business of selling or leasing motor vehicles to an individual or business pursuant to a franchise agreement, has obtained a license under the vehicle and traffic law, and is engaged in the services of diagnosis, maintenance, or repair of motor vehicles or motor vehicle engines pursuant to such franchise agreement.
- (l) "Motor vehicle manufacturer" means a business engaged in the manufacturing or assembling of motor vehicles.
- (m) “Original equipment manufacturer” means any business that, in the normal course of business, is engaged in the business of selling, leasing, or otherwise supplying new digital electronic equipment manufactured by or on behalf of itself, to any individual or business.
- (n) “Owner” means an individual or business that owns or leases digital electronic equipment purchased or used in this State.
- (o) “Part” or “parts” means any replacement part or assembly of parts, either new or used, or their equivalents, made available by an original equipment manufacturer to an authorized repair provider for purposes of effecting the services of maintenance or repair of digital electronic equipment manufactured or sold by the original equipment manufacturer. Part does not include printed circuit board assemblies that may allow device cloning in violation of 18 U.S.C. Section 1029 or other applicable law.
- (p) "Repair" means any act necessary to restore digital electronic equipment or equipment to fully working order. “Repair” does not encompass post-sale

modifications that alter the originally intended functioning of the digital electronic equipment.

- (q) “Tool” means any software program, hardware implement, or other apparatus, or its equivalent, which is made available by an original manufacturer to an authorized repair provider, and that is used for diagnosis, maintenance, or repair of digital electronic equipment manufactured or sold by the original equipment manufacturer, including software or other mechanisms that provide, program, or pair a new part, calibrate functionality, or perform any other function required to repair the original part.
- (r) “Trade secret” means anything tangible or intangible or electronically stored or kept that constitutes, represents, evidences, or records intellectual property, including secret or confidentially held, designs, processes, procedures, formulas, inventions, or improvements, or secret or confidentially held scientific, technical, merchandising, production, financial, business, or management information, or that falls within the meaning of a trade secret given in 18 U.S.C. § 1839.

Section 2. Requirements for original equipment manufacturers.

- (a) For digital electronic equipment that is manufactured for the first time, and first sold or used in the State, on or after the date that is one year after this bill becomes law, an original equipment manufacturer shall make available to any independent repair provider and owner of digital electronic equipment manufactured by or on behalf of or sold by such original equipment manufacturer, on fair and reasonable terms, any documentation, parts, and tools, or their equivalents, that are required for the diagnosis, maintenance, or repair of such digital electronic equipment and that the original equipment manufacturer makes available to an authorized repair provider.
 - (i) Such documentation, parts, and tools may be made available either directly by an original equipment manufacturer or via an authorized repair provider or an authorized third-party provider, though nothing in this bill requires third-party providers (including authorized repair providers) themselves to provide such parts, tools, and documentation.
 - (ii) Such documentation, parts, and tools may be further made available by an authorized repair provider to any independent repair provider or owner, provided that such authorized repair provider is contractually and practically permitted by the original equipment manufacturer to sell such parts, tools, and documentation to any independent repair provider or owner.
- (b) Such parts, tools, and documentation shall be made available within one year after the first sale of the digital electronic product in [name of State].

- (c) The obligations in this bill apply only to parts, tools, and documentation provided to authorized repair providers for diagnosis, maintenance, and repair of digital electronic equipment outside of the original equipment manufacturer's warranty, and do not encompass parts, tools, and documentation provided by the original equipment manufacturer only for in-warranty repairs.
- (d) Notwithstanding any other provision of this bill, nothing in this bill shall:
 - (i) Require an original equipment manufacturer to provide or make available a part, tool, or documentation to any repair provider or owner, if:
 - (A) the part, tool, or documentation is not, or is no longer, provided by the original equipment manufacturer or made available to authorized repair providers of the original equipment manufacturer, including where the original equipment manufacturer performs related repairs solely in-house or through a corporate affiliate;
 - (B) the part, tool, or documentation is no longer available to the original equipment manufacturer;
 - (C) the documentation or tool is used by the original manufacturer itself only to perform, at no cost, diagnostic services virtually through telephone, internet, chat, email, or other similar means that do not involve the manufacturer physically handling the customer's equipment, unless the manufacturer also makes the documentation or tool available to an individual or business that is unaffiliated with the manufacturer.
 - (ii) Require an original equipment manufacturer to divulge any trade secret, including documentation that includes, but is not limited to, schematics and bill of materials involving printed motherboards, or license any intellectual property, including copyrights or patents, to any independent repair provider or owner.
 - (iii) Require an original equipment manufacturer or an authorized repair provider to provide an independent repair provider or owner any information, other than "documentation" as defined herein, that is provided by the original equipment manufacturer to an authorized repair provider.
 - (iv) Require an original equipment manufacturer or authorized repair provider to make available any parts, tools or documentation for the purposes of modifying or making modifications to any digital electronic equipment.

- (v) Require any original equipment manufacturer or authorized repair provider to make available any parts, tools, or documentation in a manner that is inconsistent with or in violation of any federal or state law.
- (vi) Require an original equipment manufacturer to make available parts, tools, or documentation to an independent repair provider or owner that would disable, reset, or override electronic security locks or other security-related measures or functions, or disable or override anti-theft security measures set by the owner of the digital electronic equipment.
- (vii) Prevent original equipment manufacturers from restricting access to certain secure parts of a device from independent repair provider or owner access, provided that it does not prevent independent repair providers from completing repairs that can be completed by authorized repair providers.
- (viii) Prevent original equipment manufacturers from requiring remote authorization or an internet connection before independent repair providers or owners may use such parts or tools.
- (ix) Prevent an original equipment manufacturer from establishing reasonable training and certification programs for repair providers and requiring ongoing certification to these programs as a condition for receiving parts, tools, and documentation.
- (x) Prevent an original equipment manufacturer from requiring that independent repair providers and owners agree to reasonable commercial terms, including disclosures regarding the use of non-genuine or used parts.
- (xi) Abrogate, interfere with, contradict, or alter the terms of any agreement between an original equipment manufacturer and an authorized repair provider, including, but not limited to, the performance or provision of warranty or recall repair work by an authorized repair provider on behalf of an original equipment manufacturer pursuant to such an authorized repair agreement, except that any provision in such an authorized repair agreement that purports to waive, avoid, restrict, or limit an original manufacturer's compliance with this bill shall be void and unenforceable.
- (xii) Prevent an original equipment manufacturer from providing parts, such as integrated batteries, to independent repair providers or owners pre-assembled with other parts rather than as individual components, provided that those pre-assembled parts or their equivalents are also available to authorized repair providers.
- (xiii) 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.

- (xiv) Require an original equipment manufacturer to provide or make available source code.
 - (xv) Require an original equipment manufacturer to provide parts, tools, or documentation for repair of digital electronic equipment critical to the safety of life or health of individuals, or for repairs that could threaten the safety of life or health of individuals, including repairs to digital electronic equipment with internal switch-mode power supplies.
 - (xvi) Require an original equipment manufacturer to provide documentation or tools used exclusively by the original equipment manufacturer for diagnosis, maintenance or repairs completed by machines that operate on several digital electronic equipment products simultaneously or otherwise for purposes of large scale efficiency, if the original equipment manufacturer makes available to owners and independent repair providers sufficient alternative documentation and tools to effect the diagnosis, maintenance, or repair of the digital electronic equipment.
 - (xvii) Apply to a product that was originally made available for sale by the original equipment manufacturer before the effective date of this bill.
- (e) This bill shall not apply if the manufacturer provides to the original purchaser either one of the following:
- (i) a reimbursement; or
 - (ii) equivalent or better, readily available replacement digital electronic equipment at a price that is no more than the total cost of the sum of the parts.

Section 3. Limitation of liability.

- (a) No original equipment manufacturer or authorized repair provider shall be liable for any damage or injury to any digital electronic equipment, person, or property that occurs as a result of repair, diagnosis, maintenance, or modification performed by an independent repair provider or owner, or any other use of parts, tools, or documentation provided by an original equipment manufacturer, including but not limited to, any indirect, incidental, special or consequential damages; any loss of data, privacy or profits; or any inability to use, or reduced functionality of, the digital electronic equipment.
- (b) No original equipment manufacturer shall be liable under this bill for any act that is reasonably necessary to protect user privacy, security, or digital safety.
- (c) Original equipment manufacturers shall not be required to warrant any repairs provided by independent repair providers or owners.

- (d) No original equipment manufacturer shall be liable for improper use of personal data or any data privacy or security breach in connection with repair, diagnosis, maintenance, or modification performed by an independent repair provider or owner.

Section 4. Notice and consumer bill of rights.

- (a) Before repairing digital electronic equipment, independent repair providers shall provide to any customer, and publish on their website and the place of business, a written notice that contains the following information:
 - (i) The independent repair provider is not an authorized repair provider for the digital electronic equipment;
 - (ii) The consumer should review the terms and conditions of any warranty for the digital electronic equipment, as repairs not performed by an authorized repair provider may affect the warranty;
 - (iii) Warranties for consumer products are governed by the federal Magnuson-Moss Warranty Act (15 U.S.C. ch. 50 § 2301), which gives consumers rights and protections that apply over conflicting provisions in the warranty;
 - (iv) Under the Magnuson-Moss Warranty Act, a warranty cannot require that maintenance and repairs be performed only by an authorized repair provider;
 - (v) Under the Magnuson-Moss Warranty Act, if damage to equipment is shown to be caused by equipment not offered or sold by the original equipment manufacturer or by faulty repair performed by a non-authorized repair provider, that damage may not be covered by the warranty, but the warranty may otherwise remain in effect; and
 - (vi) All required disclosures as outlined in Section 4(b) below.
- (b) Consumer bill of rights. The below requirements shall apply to all independent repair providers that conduct repairs of digital electronic equipment covered by this bill using documentation, tools, or parts provided by original equipment manufacturers pursuant to this bill.
 - (i) Independent repair providers are required, prior to the repair of such digital electronic equipment, to disclose to consumers in writing and obtain a written acknowledgment of the following:
 - a. For each instance of service provided, what parts, if any, were not provided or produced by the original equipment manufacturer, the name of the parts provider, and any complaints about the quality of

such parts that the independent repair provider knows or has reason to know;

- b. If used parts are to be used during the repair, the duration and type of the part's previous use;
 - c. The total anticipated cost of the repair, including the itemized cost of parts and labor;
 - d. Whether the technician performing the repair is certified or has completed training to repair such digital electronic equipment, including whether the technician has undergone training required by the original equipment manufacturer to ensure safe and effective repairs;
 - e. Whether the repair procedure is in compliance with any applicable building or electrical code;
 - f. That there is a risk of damage to digital electronic equipment during the repair, including but not limited to damage to battery life or software functionality;
 - g. That there is a risk of physical harm to the consumer from an improper repair, including but not limited to increased risk of digital electronic equipment fire from faulty battery installation; and.
 - h. Any exposure of the consumer's personal data that may be involved in the repair, including access to personal data by independent repair provider's staff, and the protections that the independent repair provider will take to safeguard personal data.
- (ii) Independent repair providers are required to keep documentation of all repairs, including whether such repairs involved parts not provided or produced by original equipment manufacturers, and provide such documentation to consumers once repairs are completed.
- (iii) Independent repair providers are required to submit, to any publicly accessible registry of such repairs, certain data regarding all digital electronic equipment repairs performed without original equipment manufacturer authorization. Such data must include the make, model, serial number, date of repair service, and summary of service performed, but not any personal data regarding the consumer.
- a. As an alternative to compliance with this Section 4(b)(iii), for any repair performed by an independent repair provider without original equipment manufacturer authorization, independent repair providers must permanently attach a notice of repair containing their own brand

name to the digital electronic equipment, with the brand name in a size no smaller than the brand of the original equipment manufacturer.

Section 5. Enforcement.

- (a) The Attorney General shall have exclusive authority to enforce the provisions of this bill. Subject to Section 5(b), the Attorney General may initiate an action in the name of the State to seek an injunction to restrain any violations of this bill, and seek to obtain any relief that the Attorney General is authorized to obtain under [State UDAP statute].
- (b) Prior to initiating any action under this bill against any individual or business, the Attorney General shall provide the individual or business 30 days' written notice identifying the specific provisions of this bill the Attorney General alleges have been or are being violated. If within the 30-day period the individual or business cures the noticed violation and provides the Attorney General an express written statement that the alleged violations have been cured and that no such further violations shall occur, no action shall be initiated against the individual or business. Written notice by the Attorney General shall be delivered by certified mail and by first-class mail with proof of mailing. If an individual or business continues to violate this chapter following this cure period or breaches an express written statement provided to the Attorney General under this Section 5(b), the Attorney General may initiate an action as described in Section 5(a).
- (c) Nothing in this bill shall be construed to create an individual or private right of action, or to provide the basis for, or be subject to, an individual or private right of action for violations of any parts of this bill, including under any other law.

Section 6. Effective date. This bill shall take effect one year after it shall have become a law and shall apply only to digital electronic equipment that was manufactured for the first time, and first sold or used in the State, on or after the date that is one year after this bill becomes law.

March 16, 2026

The Honorable Rebecca Himschoot, Co-Chair
The Honorable Donna Mears, Co-Chair
House Committee on Community & Regional Affairs
Alaska State Capitol
120 4th Street
Juneau AK 99801

RE: HB 162 Digital Right to Repair Act

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

Thank you for the opportunity to explain why TechNet respectfully opposes HB 162, which your committee will be considering.

TechNet is the national, bipartisan network of technology CEOs and senior executives that promotes the growth of the innovation economy by advocating a targeted policy agenda at the federal and 50-state level. **TechNet's diverse membership includes dynamic** American businesses ranging from startups to the most iconic companies on the planet and represents over 4.5 million employees and countless customers in the fields of information technology, artificial intelligence, e-commerce, the sharing and gig economies, advanced energy, transportation, cybersecurity, venture capital, and finance.

TechNet understands and appreciates the goal behind right-to-repair legislation. Consumers should have reasonable options when it comes to repairing their devices, and we recognize the growing interest among policymakers in ensuring that products can be serviced in a timely and affordable manner.

However, as currently drafted, HB 162 is overly broad and would extend far beyond the types of consumer products typically contemplated in right-to-repair legislation. In most states considering right-to-repair policies, legislation focuses specifically on consumer electronic products, and in some cases agricultural equipment. HB 162, however, **defines a "digital product" as "a product that depends for its functioning, in whole or in part, on digital electronics embedded in or attached to the product."** This definition is extremely expansive and opens the door to a wide range of products that go far beyond traditional consumer electronics.

Under this definition, HB 162 could apply not only to computers and phones, but also to equipment used to operate the electric grid, water systems, and other forms of critical infrastructure. Including these types of systems within the scope of a repair framework designed for consumer electronics raises serious safety, security, and operational concerns.

For consumer products, there are already a variety of repair options available today, **including independent repair providers as well as manufacturers' authorized repair** networks. Many of these authorized repair providers are small local businesses that receive training and certification from manufacturers to ensure repairs are conducted properly and safely.

These authorized repair relationships are important because they create a clear accountability structure. Through contractual agreements, manufacturers ensure that technicians have the appropriate training, access to safe repair procedures, and the qualifications necessary to protect both the device and the consumer. These arrangements help ensure that repairs meet performance and safety standards, something consumers rightfully expect.

Unfortunately, HB 162 would weaken this accountability structure while simultaneously expanding the scope of repair obligations to an extremely broad category of products. For example, when consumers bring a device containing large amounts of personal data—such as a phone or laptop—to a repair provider, they reasonably expect that the repair will be handled by technicians who have received proper training and who operate within an accountable framework. Removing that link between manufacturers and repair providers raises concerns about both consumer safety and data security.

Additionally, because the bill’s definition of “digital product” could encompass systems used in critical infrastructure, the legislation raises significant concerns related to intellectual property and trade secrets. Manufacturers invest substantial resources in developing diagnostic tools, software, and repair systems. Many of these tools are proprietary and are shared only within authorized repair networks under carefully structured contractual agreements.

HB 162, however, would require manufacturers to provide access to these tools without those contractual protections, potentially exposing sensitive intellectual property and undermining the security protections built into these systems.

As introduced, HB 162 goes well beyond legislation intended to provide consumers with greater repair options for their personal electronic devices. Instead, the bill captures an expansive range of products—including systems tied to critical infrastructure—that were likely never intended to fall within the scope of right-to-repair legislation.

If Alaska wishes to explore policies that expand repair options for consumer electronic products, TechNet will respectfully recommend considering language developed by TechNet and the Consumer Technology Association (CTA). This model legislation provides a more carefully tailored framework that supports consumer repair options while also preserving important safety, cybersecurity, and intellectual property protections.

For these reasons, TechNet respectfully urges the committee not to move HB 162 forward as currently drafted. We would welcome the opportunity to work with the committee and other stakeholders to develop a more targeted and workable approach.

Thank you for your consideration.

Sincerely,



Rose Feliciano
Executive Director
Washington + Northwest

States have consistently protected security and life safety systems and devices

Finally, adopting an exemption for security and life safety systems would align Alaska’s Digital Right-to-Repair Act with a growing nationwide consensus on this issue. *Every state that has enacted digital right-to-repair legislation to date has taken steps to safeguard security and life safety systems, recognizing that public safety must remain the overriding priority; and the vast majority have done so using language recommended by the alarm industry.* A survey of such exemptions in digital right-to-repair laws is attached for your review.

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 Kylan, 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)

Attachment



Alarm Exemptions in State Right-to-Repair Laws

California - Digital Right to Repair for Electronics and Appliances (2023)

California's digital right-to-repair law is codified in Public Resources Code §§ 42488–42488.3. The law defines “electronic or appliance product” to exclude **a product or component of an alarm system... including a fire protection system**. This exclusion is detailed in Section 42488.2(j)(3)(B):

(B) “Electronic or appliance product” or “product” does not include any of the following:

(i) Equipment or repair parts as defined in Chapter 28 (commencing with Section 22900) of Division 8 of the Business and Professions Code.

(ii) A product or component of an “alarm system” as defined in subdivision (c) of Section 7590.1 of the Business and Professions Code, including a fire protection system, as defined in the California Fire Code.

Colorado - Right to Repair Digital Electronic Equipment Act (2024)

Colorado's Consumer Right to Repair Digital Electronic Equipment Act was adopted in House Bill 24-1121 and signed into law on May 28, 2024. Under Section 6-1-1503(5)(n) of the Colorado Revised Statutes, the law does not apply to:

(n) Fire alarm systems, intrusion detection equipment that is provided with a security monitoring service, life safety systems, and physical access control equipment, including electronic keypads and similar building access control electronics.

Connecticut – Act Concerning Consumer Protection and Safety (2025)

SB 3 is a comprehensive consumer protection law that includes provisions to “require manufacturers of consumer goods to enable third parties to repair such consumer goods.” The bill expressly exempts alarm systems and defines “Electronic or appliance product” or “product” as not including any “alarm system, as defined in section 29-6c of the general statutes.”

(4) "Electronic or appliance product" or "product" (A) means any antenna, electronic set, major home appliance or rotator (i) that is manufactured for the first time, and first sold or used in this state, on or after July 1, 2026, and (ii) for which the manufacturer makes documentation, parts and tools available to an authorized repair provider, (B) includes any item set forth in subparagraph (A) of this subdivision that is sold through any method other than a direct retail sale, and (C) does not include any (i) alarm system, as defined in section 29-6c of the general statutes, (ii) motor vehicle, as defined in section 13b-387 of the general statutes, or any component used to maintain, manufacture or repair any motor vehicle, or (iii) video game console;

New York – Digital Fair Repair Act (2022)

New York digital right-to-repair law is codified at New York General Business Law § 399-nn. It expressly exempts **security devices and alarm systems**, including any related software and components, from its right-to-repair requirements. This exemption is detailed in subdivision 3(g) of the statute:

(g) Nothing in this section shall be construed to require any original equipment manufacturer or authorized repair provider to make available any parts, tools, or documentation required for the diagnosis, maintenance, or repair of any home appliance that has a digital electronic product embedded within it, including, but not limited to, refrigerators, ovens, microwaves, air conditioning, heating units, and **security devices or alarm systems including any related software and components**.

Oregon – Right to Repair Act (2024)

Oregon's Right-to-Repair law was adopted in Senate Bill 1596, enacted in March 2024. Recognizing concerns from the security industry, Oregon enacted Senate Bill 959 on May 22, 2025, to address gaps in SB 1596. **SB 959 explicitly exempts alarm systems and related components from the requirements of the Right to Repair law** by adding a new subsection (3)(g)(F) that provides:

(3) This section does not:

(g) Apply to:

(F) An alarm system that consists of an assembly of software, equipment, wiring or devices that is installed and arranged for the purpose of detecting and signaling a physical hazard or a condition or situation that differs substantially from a specified norm.

Texas - Digital Right to Repair (2025)

Texas's Digital Right to Repair law was adopted in House Bill 2963, enacted in June 2025 during the 89th Texas Legislature. The bill was signed by Governor Greg Abbott on June 20, 2025, and it includes a **broad express exemption for life safety systems, fire alarm systems, intrusion detection devices and their components, and physical access control equipment, including access control electronics**. Section 121.002

(b)(11) provides that this chapter does not apply to:

(11) fire alarm systems, intrusion detection equipment that is provided with a security monitoring service, life safety systems, and physical access control equipment, including electronic keypads and similar building access control electronics;

Washington – Right to Repair Act (2025)

Washington's Right to Repair Act was adopted in House Bill 1483, enacted in May 2025. The law becomes effective on January 1, 2026, and includes a **broad express exemption for life safety systems, fire alarm systems, intrusion detection devices and their components, and physical access control equipment, including access control electronics**. Paragraph (8)(f) of Section 5 provides that nothing in this chapter shall apply to a:

(f) Life safety system, fire alarm system, or intrusion detection device, including its components, that is provided or configured to be provided with a security monitoring service; and physical access control equipment, including electronic keypads and similar building access control electronics.



**Testimony of
Mike Blank
CTIA**

**In Opposition to
Alaska HB 162**

**Before the
Alaska Senate Committee on Community and Regional Affairs**

March 30, 2026

On behalf of CTIA®, the trade association for the wireless communications industry, I submit this testimony in opposition to House Bill 162, which places mandates on original equipment manufacturers regarding diagnostic and repair information for certain digital electronic equipment. The marketplace already provides a wide range of consumer choice for repair with varying levels of quality, price, and convenience without the mandates imposed by this legislation.

The marketplace continues to evolve, and manufacturers and other market participants continue to make changes to address consumer demand while offering consumers safe and reliable repair options. For example, manufacturers have relationships with authorized repair providers. These providers have received the appropriate training from manufacturers and have the qualifications to help ensure that repairs are done properly and safely.

In addition to authorized repair providers, manufacturers may offer walk-in repair options at retail stores as well as mail-in services. Insurance providers may also offer repair options, including authorized third-party remote technicians that will travel to the consumer to perform repairs. Moreover, consumers can currently avail themselves of numerous independent repair alternatives although manufacturers cannot guarantee the quality assurance of independent repair providers.



Additionally, many manufacturers have expanded repair options for consumers, from growing the number of authorized repair providers, to increasing access to tools, parts, and manuals directly to consumers. It is important that with more repair options available to consumers, consumers continue to have access to professional repair providers with demonstrable competence to provide a safe and reliable repair.

To further address the repair marketplace, CTIA launched two programs related to repair, the Wireless Industry Service Excellence (WISE) Technician Certification Program and the WISE Authorized Service Provider (ASP) Certification Program. The WISE technician program educates and tests wireless device repair technicians on industry-recognized standards, certifying those that meet the highest standards for service quality and technical skill. The first certification of its kind, WISE-certified device repair technicians provide consumers with a predictable, high-quality repair experience.¹

The WISE ASP program creates a network of certified retail locations, helping consumers identify qualified providers that meet the highest standards for service quality and wireless device repair.² Both programs were created by CTIA's Reverse Logistics and Service Quality Working Groups, which convene members representing the entire reverse logistics community to address the wireless industry's challenges and develop requirements for industry-recognized standards in repair and refurbishment of wireless devices. CTIA also recently introduced the first ever postsecondary

¹ <https://www.ctia.org/news/ctia-launches-technician-certification-program>

² <https://www.ctia.org/news/ctia-launches-retail-certification-program-for-wireless-device-repair>



education mobile device repair certification program to provide an academic avenue for credentialing and certifying more device repairers.³

Wireless companies, individually, and through industry associations have taken proactive steps to provide consumers with more device repair options, while accounting for the need to maintain device integrity and security and to protect intellectual property rights. These include the expansion of CTIA's WISE program to include over 24,000 certified technicians nationally, continued growth of manufacturers' authorized repair networks, and the availability of access to tools, parts, and manuals directly to consumers.

CTIA is also concerned that this bill would have the unintended consequence of negatively impacting consumers of digital equipment by eliminating the need for repairers to demonstrate to consumers that they have the technical competence to perform safe, secure, and reliable repairs. Manufacturers want to make certain the repair providers they work with understand the numerous components of the electronic products being repaired. Their authorization to perform repairs ensures that the changes made to the devices are compatible with current technology and the networks on which they operate.

Finally, CTIA is concerned that this legislation has the potential to weaken the safety, privacy, and security features of electronic products. The security of user information is of the utmost importance to consumers. The potential weakening of privacy and safety protections will increase risks to consumers. With broad and unchecked access to technical information, security protections

³ CTIA, *MCC to Launch First Mobile Device Repair Certification Program in Postsecondary Education* (Jan. 17, 2023), <https://www.ctia.org/news/mcc-to-launch-first-mobile-device-repair-certification-program-in-postsecondary-education>.



could be easily circumvented. In an era of sophisticated cyberattacks, we should not make it easier to hack devices and networks.

This bill is an unnecessary intervention in the marketplace, and its mandates could cause safety, privacy, and security risks that compromise consumer safety and protection. For these reasons, CTIA respectfully asks that you not move this legislation.

Coalition Against Illegal Tampering

Our coalition is unified in opposition to legislation that would allow for unfettered access to the software governing safety and security of our products. And, in the case of engine-powered products, the software controlling emissions technology on products manufactured, sold, and operated by coalition members.

Often, we find proponents of “Right to Repair” policies include the need for access to this software in their advocacy. However, we believe giving access to source code will increase the risk of tampering that runs afoul of applicable Federal safety, security, and emission requirements. Additionally, it threatens to undermine manufacturers’ innovation and intellectual property rights.

Another potential risk is due to damage from modifications, which must be understood as distinctly different than repairs, by untrained individuals. Modifications create product safety and performance issues, which can lead to claims against the original equipment manufacturers (OEMs). In addition, dealers who take trade-ins or refurbish used equipment, as well as subsequent owners, may not know the equipment is modified and are at risk of catastrophic failures.

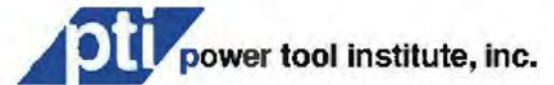
Our industries and customers share in the desire to minimize downtime and maximize productivity. That is part of the reason why our broad coalition has invested significant capital in cutting-edge proprietary innovations that incorporate the latest technology, training, and support for end users.

Our coalition members do not believe that proprietary software, developed specifically for the safe operation of equipment that meets strict government regulations, should be used to “legalize” tampering.

COALITION MEMBERS

Associated Equipment Distributors
Connecticut Construction Industries Association
Deep Southern Equipment Dealers Association
Engine Technology Forum
Equipment Leasing and Financing Association
Far West Equipment Dealers Association
International Snowmobile Manufacturers Association
International Union of Operating Engineers
Iowa-Nebraska Equipment Dealers Association
IPC
Latino Landscape Network
Marine Retailers Association of the Americas
Montana Equipment Dealers Association

National Association of Landscape Professionals
National Marine Distributors Association
National Marine Manufacturers Association
North American Equipment Dealers Association
Northeast Equipment Dealers Association
Outdoor Power Equipment Institute
Outdoor Power Equipment and Engine Service Association
Passenger Vessel Association
Pioneer Equipment Dealers Association
Portable Generator Manufacturers Association
Power Tool Institute
Professional Grounds Management Society
PRBA - The Rechargeable Battery Association
Truck & Engine Manufacturers Association



From: David Holland <dholland@ditchwitchwest.com>

Sent: Friday, March 13, 2026 7:03 PM

Subject: Opposition to HB 162 and Its Impact on Our Business

Dear Representative,

As a territory manager at Ditch Witch West in Alaska, I must oppose HB 162. The requirement to provide documentation (AS 45.45.800–899) at no charge, and to offer parts on the same terms as authorized providers, directly threatens our business model. We invest in specialized training and tools to ensure safe, high-quality repairs. This legislation would erode our competitive advantage, reducing revenue and possibly impacting customer safety. I urge reconsideration of these provisions.

Sincerely,



Dave Holland
Territory Manager
Alaska/Hawaii

Cell: (907) 217-0955
Office (907) 248-0010



P.O. Box 419264 • Kansas City, MO 64141-6264 • 816-561-5323 • www.naeda.com

HB 162 Position Statement

The North America Equipment Dealers Association is a trade association representing approximately 3,500 farm, industrial and outdoor power equipment dealers in North America. Through the sale of equipment, parts, and service, our dealer members work in partnership with their customers to make them the most productive and competitive in the world.

Our industry is a leading example of one that supports customer self-repair. Equipment manufacturers and dealers are committed to providing access and widespread availability of parts, tools, documentation, and diagnostic capabilities to owners and independent repair shops. The reality of the repair landscape demonstrates this commitment. A third-party survey of our industry showed that nearly 60 percent of all parts sold are installed by someone other than the dealership, and dealers sell parts to multiple independent repair shops.

In addition to the support provided directly to owners and independent repair shops, the major stakeholders on this issue have agreed to a Memorandum of Understanding. The MOU between John Deere, CNHI, Kubota, AGCO, Claas and the American Farm Bureau Federation is a private sector solution that formalizes the commitment to supporting customer repair and makes legislation unnecessary for our industry. Those MOUs are living documents that are reassessed every six months by both parties to account for technology updates, something legislation is not equipped to do.

Mandating that OEMs sell parts and tools on the same terms and conditions as they sell to authorized dealers would have dramatic negative consequences. This provision would turn our dealer's suppliers into their competitors, a clear breach of the contracts clause. A price fixing mandate would also significantly decrease the parts on-hand that dealers stock in inventory if they are unable to make a profit from them. The effect would be increased downtime due to lack of parts availability, which is entirely counter productive to the intended purpose of the bill.

Dealers invest millions of dollars into facilities, personnel, training, and inventory. The average dealer stocks over \$1 million in parts inventory to have the parts on-hand their customers need. It is entirely unreasonable to pass legislation that mandates manufacturers sell directly to independent repair shops on the same terms and conditions as authorized dealers, undermining the authorized dealer's investment.

HB 162 presents several practical and constitutional issues. These problems are entirely unnecessary given the MOUs between the major stakeholders on this issue and reality of the repair landscape. We urge legislators to support those MOUs and not create additional challenges with unwarranted legislative mandates.

Eric Wareham
Vice President of Government Affairs
North American Equipment Dealers Association

From: [Gottlieb, Darbi](#)
To: [Rep. Rebecca Himschoot](#); [Rep. Donna Mears](#)
Subject: HB 162
Date: Tuesday, March 17, 2026 2:09:14 PM

Co-Chairs Himschoot and Mears,

I hope this email finds you well.

My name is Darbi Gottlieb, and I am the Senior Director of State Government and Regional Affairs for the Advanced Medical Technology Association (AdvaMed). We are the largest trade association representing medical technology innovators and manufacturers.

I'm reaching out regarding HB 162 that will be heard in your committee on Thursday. We received confirmation from Rep. Dibert's office that a committee substitute will be offered to align the bill with the Senate version, SB 111, which includes a critical exemption for medical devices.

We very much appreciate, and support this language, as it provides crucial patient safety protections.

I would be happy to answer any additional questions, and appreciate the committee's work on this issue.

Thanks in advance,

Darbi

Darbi Gottlieb

Senior Director, State Government & Regional Affairs

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CTA.tech

March 31, 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,

A handwritten signature in black ink, appearing to read 'Katie Reilly', with a long horizontal line extending to the right.

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



March 17, 2026

The Honorable Rebecca Himschoot and Donna Mears
Members, Alaska House Committee on Committee and Regional Affairs

Re: Electronics Manufacturers Opposition to HB 162

Chair Himschoot, Chair Mears, and Members of the Committee:

On behalf of the hundreds of manufacturers and businesses our coalition represents, we respectfully oppose HB 162. This legislation would mandate original equipment manufacturers (OEMs) of digital electronic equipment sold or used in Alaska to provide independent repair providers with diagnostic and repair information, software, tools, and parts – but without requiring any of the critical consumer protections afforded by authorized repair networks and their self-service repair offerings, such as training and competency certification, and putting at risk protections manufacturers have built in for consumer data privacy and security. Without any vetting process for qualified repair facilities, the potential for consumer harm is significant and undermines the innovations manufacturers have developed to protect customers. Additionally, we have concerns that this legislation would assist in establishing a “patchwork” of repair legislation in the states, thus creating a burdensome and contradictory compliance regime for members of our industry. Over the years, we have made a direct attempt to work with advocates on numerous occasions to develop a national memorandum of understanding, but our efforts have been repeatedly rebuffed. It appears their preference is to relitigate this issue on a state-by-state

basis, which will inevitably result in a costly, confusing, and onerous compliance patchwork.

Our organizations represent a broad spectrum of manufacturers of consumer electronics, security equipment, toys, lithium-ion batteries, and other connected electronic products, as well as companies that rely on the secure operation of these devices. All of these companies stand behind the quality of their products. Our members develop products and services for a wide range of commercial, government, and consumer users. Their customers depend on these products to operate safely, securely, and accurately, whether they are being used to support banking and commercial transactions, transmit and store sensitive personal data, support industrial operations, medical applications, or securely offer and deliver entertainment and other services. As businesses, government agencies, and consumers continue to increase their reliance on connected devices to help deliver efficiency, convenience, and services, it is important to remain vigilant and focused on mitigating the risks associated with the safe and secure operation of those products.

HB 162 mandates that OEMs treat any independent repair provider in much the same way as authorized network providers or those who use the self-repair offerings – but without any contractual protections, requirements, or restrictions. In **doing** so, the bill places consumers and their data at risk, undermines the business of **Alaska** companies **that are part of OEM-authorized networks**, and **stifles** innovation by putting hard-earned intellectual property in the hands of hundreds, if not thousands, of new entities. Further, the bill fails to account for the wide range of repair and refurbishment options currently available to Alaska consumers from both OEM-authorized and independent repair stores. It also does not **address** advancements in sustainability by electronic product manufacturers.

For these reasons, we urge the committee against moving forward with this legislation without addressing these identified issues.

HB 162 harms consumer security.

One of our chief concerns with this legislation is its potential to weaken the privacy and security features of various electronic products. The security of user information on these products is of the utmost importance to consumers that rely on them. Computers, tablets, and smartphones are at risk of hacking, and weakening of the privacy and security protections of those products will increase risks to consumers. With access to technical information, criminals can more easily circumvent security protections, harming not only the product owner but also everyone who shares their network. In an era of sophisticated cyberattacks, we should not make it easier for criminals to hack security provisions.

Forcing OEMs to provide unauthorized repair facilities with information on how to bypass consumers' safety locks presents unacceptable risks to consumers' data privacy. [A recent study](#) found that privacy violations already occur when consumers seek computer or phone repairs. Without the contractual safeguards created by authorized repair networks that allow OEMs to hold bad actors

accountable, HB 162 will create new opportunities for snooping repair technicians to access and copy consumers' personal data.

HB 162 harms consumer safety.

Manufacturers offer authorized repair networks to provide consumers with assurance that their products are serviced by properly trained and vetted repair professionals who have the necessary skills to repair electronic products safely and reliably.

Most consumer technology products are comprised of complex electronics which require specialized training and sophisticated test instruments to repair safely. Some types of repairs can be extremely detailed, complicated, and dangerous to anyone without proper training. It is particularly important that products containing high-energy lithium-ion batteries are repaired only by trained professionals who understand and mitigate the hazards associated with installing, removing or replacing these batteries. In January 2021, the U.S. Consumer Product Safety Commission released a [consumer safety warning](#) that rechargeable lithium-ion battery cells, when they are "loose" and not installed in a device or part of an integral battery, are "potentially hazardous to consumers when handled, transported, stored, charged, or used to power devices" and "can overheat and experience thermal runaway, igniting the cell's internal materials and forcibly expelling burning contents, resulting in fires, explosions, serious injuries and even death."

Manufacturers want to ensure that their products are serviced by professionals who understand the intricacies of their products and have spent time procuring the knowledge necessary to safely repair them and return them to consumers without compromising those standards or undermining the safety and security of their products. Authorized repair networks not only include training requirements but also have the technical skills and test instruments to verify that repair parts meet all necessary performance and safety specifications. Consumers can be protected by warranties or other means of recourse. The legislation provides no such protections for consumers, repair shops, or manufacturers.

When an electronic product breaks, consumers have a variety of professional repair options, including using an OEM's authorized repair network, which often include local repair service providers as well as mail-in and even in-house repair options for some categories of products. Consumers may also choose to use one of many independent repair providers; although they do so without the quality assurance provided by using a manufacturer's authorized network provider. The point is that the free-market economy provides a wide range of consumer choice for repair with varying levels of quality, price, and convenience without mandates imposed by the legislation.

Manufacturers' authorized networks of repair facilities guarantee that repairs meet OEM performance and safety standards. If an OEM's brand and warranty are to stand behind repair work and assume product liability, it is only reasonable that the repair facility demonstrates competency and reliability. Without the training and other quality assurance requirements of authorized

service providers, manufacturers would not be able to stand behind their work, warranties, technical support, ongoing training, and business support.

HB 162 mandates the disclosure of protected proprietary information. Manufacturers make significant investments in the development of products and services, and the protection of intellectual property is a legitimate and important aspect of sustaining the health of the vibrant and innovative technology industry. However, HB 162 puts at risk the intellectual property that manufacturers have developed.

Consumer electronics' on-board software (i.e., firmware) are key to the functioning and operation of the hardware it is embedded in, and firmware helps protect against unauthorized access to other software and applications. That software is subject to copyright under federal law, and Section 1201 of the Digital Millennium Copyright Act, a related federal law, ensures that bad actors cannot tamper with the digital rights management that copyright owners use to protect this software. The problem is that making repairs to hardware components may require the circumvention of digital rights management and leave the software in an unprotected state – harming the copyright owners of the software.

Firmware controls many other product functions, so opening it up for repair purposes exposes other more sensitive functions, such as security features, to potential tampering. Given the scope of products covered and what must be provided under the legislation – including diagnostics, tools, parts, and updates to software – it is highly likely some of the information would be proprietary. Providing unauthorized repair facilities and individuals with access to proprietary information without the contractual safeguards currently in place between OEMs and authorized service providers places OEMs, suppliers, distributors, and repair networks at risk.

HB 162 fails to account for advancements in sustainability by electronic product manufacturers.

The **bill** is partly based on an inaccurate assumption that **it** will aid in the reduction of electronic waste in the state of Alaska. According to a recent study by Yale and Rochester Institute of Technology researchers, e-waste generation in the U.S. peaked in 2015 and is in a period of extended decline (see [“Electronic Waste on the Decline, New Study Finds”](#)). This trend is corroborated by recent data from the U.S. Environmental Protection Agency whose [data](#) shows consumer electronics as the fastest declining part of the municipal solid waste stream.

Electronic product manufacturers have developed robust policies and programs to ensure that they are continuously improving the sustainability of their products for their whole lifecycle, from design to material sourcing, product performance, reuse, and responsible end of life management.

This has led to continued innovation and the use of new technologies which provide consumers improved devices while simultaneously reducing the overall amount of e-waste generated – all under the existing product repair

environment. Plus, with new technologies like OLED and additional lightweighting across the electronics industry, additional declines in e-waste generation are expected to continue during the coming decades.

Repair and reuse are important elements of electronics manufacturers sustainability efforts. Not only is repair and reuse in the OEM's best interest so that consumers can continue to enjoy their products, but many OEMs are returning still-useful electronic products to active service to get the maximum benefits out of the resources used to make them.

Additionally, under revised "green" procurement standards, federal agencies and other purchasers will be required to purchase computers that meet certain environmental performance criteria under the Electronic Product Environmental Assessment Tool (EPEAT) rating system. These existing policies and programs promote repair and reuse without the consumer safety, security or business being compromised.

Conclusion

Thank you for considering our perspective on this complicated issue. Our members **bear** a significant responsibility to the businesses, governments, and individual consumers **that depend** on us to protect the safety and security of their electronic products, as well as the sensitive data that they contain. We are committed to working with you to promote digital privacy and security, while resisting unwarranted intervention in the marketplace with one-size-fits-all mandates that compromise consumer safety and protection. Many of the members of our coalition **have** already taken measures to ensure consumers have numerous options for repairing their devices and appliances. The industry is **evolving** in a positive manner. For those reasons, we oppose HB 162.

Sincerely,

Repair Done Right Coalition

MODEL DIGITAL REPAIR BILL – CTA/TECHNET

Section 1. Definitions. For the purposes of this bill, the following terms shall have the following meanings:

- (a) “Authorized repair provider” means an individual or business who has an arrangement with the original equipment manufacturer, for a definite or indefinite period, under which the original equipment manufacturer grants to the individual or business a license to use a trade name, service mark, or other proprietary identifier for the purposes of offering the services of diagnosis, maintenance, or repair of digital electronic equipment, under the name of the original equipment manufacturer, or other arrangement with the original equipment manufacturer to offer such services on behalf of the original equipment manufacturer.
- (b) “Diagnosis” means the process of identifying the issue or issues that cause digital electronic equipment or equipment to not be in fully working order.
- (c) “Digital electronic equipment” means any hardware product that depends, in whole or in part, on digital electronics embedded in or attached to the product in order for the product to function, for which the original equipment manufacturer makes available tools, parts, and documentation to authorized repair providers
 - (i) “Digital electronic equipment” only includes items sold at retail for personal, household, family, or home office use, and does not include any product sold under a business-to-government or business-to-business contract that is not typically offered for sale directly by a retail seller.
 - (ii) “Digital electronic equipment” does not include:
 - (A) Information technology equipment that is intended for use in critical infrastructure as defined in 42 U.S.C. § 5195c(e).
 - (B) A motor vehicle manufacturer, manufacturer of motor vehicle equipment, or motor vehicle dealer acting in such capacity, or to any product or service of a motor vehicle manufacturer, manufacturer of motor vehicle equipment, or motor vehicle dealer acting in such capacity.
 - (C) A medical device, as defined in this section, or a digital electronic product found in a medical setting including diagnostic, monitoring, or control equipment or any product or service that they offer.
 - (D) A manufacturer, distributor, importer, or dealer of any off-road (non-road) equipment, including but not limited to, farm and utility tractors, farm implements, farm machinery, forestry equipment, industrial equipment, utility equipment, construction equipment, compact construction equipment, mining equipment, turf, yard and

garden equipment, outdoor power equipment (including portable generators), aviation, 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.

- (E) Commercial and industrial electrical equipment (including power distribution equipment, such as telecommunications network infrastructure, commercial visual display equipment, medium/low voltage switchgear and transformers, power control equipment, such as medium/low voltage motor control and drives, power quality equipment, such as uninterruptable power supplies, remote power panels, power distribution units and static/transfer switches) and any tools, technology, attachments, accessories, components, and repair parts for any of the foregoing.
- (F) An electronic bicycle manufacturer, distributor, importer, retailer, or dealer.
- (G) A home appliance that has a digital electronic product embedded within it, including, but not limited to, refrigerators, ovens, microwaves, air conditioning, heating units, motorized shades, lighting control systems, and security devices or alarm systems, including any related software and components.
- (H) Safety communications equipment, the intended use of which is for emergency response or prevention purposes by an emergency service organization, such as a police, fire, or medical and emergency rescue services agency.
- (I) [A video game console, and its components and peripherals].¹

(iii) “Digital electronic product” only includes products that have a wholesale price to the retailer, or to others outside of direct retail sale, of not less than fifty dollars (\$50).

(d) “Documentation” means any manual, diagram, reporting output, service code description, or similar kind of information, or its equivalent, required for effecting the services of diagnosis, maintenance, or repair of digital electronic equipment, and made available by the original equipment manufacturer to an authorized

¹ Some states (CA and MN) have incorporated an exclusion for video game consoles. CTA is neutral on an exclusion for video game consoles.

repair provider for the purpose of effecting the services of diagnosis, maintenance, or repair of digital electronic equipment manufactured or sold by the original equipment manufacturer.

- (e) “Fair and reasonable terms” means making available parts, tools, or documentation as follows:
 - (i) With respect to documentation required for repair, that such documentation is made available by the original equipment manufacturer on terms that are not conditioned on an arrangement described in section (1)(a) of this bill, and at no charge, except that, when the documentation is requested in physical printed form, a charge may be included for the reasonable actual costs of preparing and sending the copy.
 - (ii) With respect to tools, that such tools are made available by the original equipment manufacturer (i) on terms that are not conditioned on an arrangement described in section (1)(a) of this bill, and without any impediments that do not also apply to authorized repair providers to access or use the tool to diagnose, maintain, or repair digital electronic equipment using parts provided by the original equipment manufacturer, and (ii) at no charge for use or operation of such tool, or at costs that are equivalent to the lowest actual cost for which the original equipment manufacturer offers the tool to an authorized repair provider, including any discount, rebate, or other financial incentive offered to an authorized repair provider, and provided that when such tool is requested in physical form, a charge may be included for the reasonable, actual costs of procuring, preparing and sending such tool.
 - (iii) With respect to parts, that such parts are made available by the original equipment manufacturer, either directly or through an authorized distributor or repair provider, subject to the clarification in Section 2(d)(xii) of this bill that parts may be provided as pre-assembled components in certain circumstances, at reasonable costs and on terms under which an OEM offers the part to an authorized repair provider and that are not conditioned on an arrangement described in section (1)(a) of this bill.
 - (iv) Such parts tools, and documentation shall be made available on commercially reasonable terms that are fair to all parties, including the original equipment manufacturer and authorized repair providers.
- (f) “Independent repair provider” means an individual or business operating in this State, that does not have an arrangement described in section (1)(a) of this bill with an original equipment manufacturer, who is not affiliated with any individual or business who has such an arrangement, and who is engaged in the services of diagnosis, maintenance, or repair of digital electronic equipment.

- (g) “Maintenance” means any act necessary to keep currently working digital electronic equipment in fully working order.
- (h) “Medical device” means an instrument, apparatus, implement, machine, contrivance, implant, or other similar or related article, including a component part, or accessory, as defined in the federal Food, Drug, and Cosmetic Act, 21 U.S.C. § 321(h), which is intended for use in the diagnosis of disease or other conditions, or in the cure, mitigation, treatment, or prevention of disease, in humans or other animals.
- (i) “Modification” or “modify” means any alteration to digital electronic equipment that is not maintenance and not a repair.
- (j) “Motor vehicle” means a vehicle that is designed for transporting persons or property on a street or highway and is certified by the manufacturer under all applicable motor vehicle federal safety and emissions standards and requirements for distribution and sale in the United States.
- (k) "Motor vehicle dealer" means an individual or business who, in the ordinary course of business, is engaged in the business of selling or leasing motor vehicles to an individual or business pursuant to a franchise agreement, has obtained a license under the vehicle and traffic law, and is engaged in the services of diagnosis, maintenance, or repair of motor vehicles or motor vehicle engines pursuant to such franchise agreement.
- (l) "Motor vehicle manufacturer" means a business engaged in the manufacturing or assembling of motor vehicles.
- (m) “Original equipment manufacturer” means any business that, in the normal course of business, is engaged in the business of selling, leasing, or otherwise supplying new digital electronic equipment manufactured by or on behalf of itself, to any individual or business.
- (n) “Owner” means an individual or business that owns or leases digital electronic equipment purchased or used in this State.
- (o) “Part” or “parts” means any replacement part or assembly of parts, either new or used, or their equivalents, made available by an original equipment manufacturer to an authorized repair provider for purposes of effecting the services of maintenance or repair of digital electronic equipment manufactured or sold by the original equipment manufacturer. Part does not include printed circuit board assemblies that may allow device cloning in violation of 18 U.S.C. Section 1029 or other applicable law.
- (p) "Repair" means any act necessary to restore digital electronic equipment or equipment to fully working order. “Repair” does not encompass post-sale

modifications that alter the originally intended functioning of the digital electronic equipment.

- (q) “Tool” means any software program, hardware implement, or other apparatus, or its equivalent, which is made available by an original manufacturer to an authorized repair provider, and that is used for diagnosis, maintenance, or repair of digital electronic equipment manufactured or sold by the original equipment manufacturer, including software or other mechanisms that provide, program, or pair a new part, calibrate functionality, or perform any other function required to repair the original part.
- (r) “Trade secret” means anything tangible or intangible or electronically stored or kept that constitutes, represents, evidences, or records intellectual property, including secret or confidentially held, designs, processes, procedures, formulas, inventions, or improvements, or secret or confidentially held scientific, technical, merchandising, production, financial, business, or management information, or that falls within the meaning of a trade secret given in 18 U.S.C. § 1839.

Section 2. Requirements for original equipment manufacturers.

- (a) For digital electronic equipment that is manufactured for the first time, and first sold or used in the State, on or after the date that is one year after this bill becomes law, an original equipment manufacturer shall make available to any independent repair provider and owner of digital electronic equipment manufactured by or on behalf of or sold by such original equipment manufacturer, on fair and reasonable terms, any documentation, parts, and tools, or their equivalents, that are required for the diagnosis, maintenance, or repair of such digital electronic equipment and that the original equipment manufacturer makes available to an authorized repair provider.
 - (i) Such documentation, parts, and tools may be made available either directly by an original equipment manufacturer or via an authorized repair provider or an authorized third-party provider, though nothing in this bill requires third-party providers (including authorized repair providers) themselves to provide such parts, tools, and documentation.
 - (ii) Such documentation, parts, and tools may be further made available by an authorized repair provider to any independent repair provider or owner, provided that such authorized repair provider is contractually and practically permitted by the original equipment manufacturer to sell such parts, tools, and documentation to any independent repair provider or owner.
- (b) Such parts, tools, and documentation shall be made available within one year after the first sale of the digital electronic product in [name of State].

- (c) The obligations in this bill apply only to parts, tools, and documentation provided to authorized repair providers for diagnosis, maintenance, and repair of digital electronic equipment outside of the original equipment manufacturer's warranty, and do not encompass parts, tools, and documentation provided by the original equipment manufacturer only for in-warranty repairs.
- (d) Notwithstanding any other provision of this bill, nothing in this bill shall:
 - (i) Require an original equipment manufacturer to provide or make available a part, tool, or documentation to any repair provider or owner, if:
 - (A) the part, tool, or documentation is not, or is no longer, provided by the original equipment manufacturer or made available to authorized repair providers of the original equipment manufacturer, including where the original equipment manufacturer performs related repairs solely in-house or through a corporate affiliate;
 - (B) the part, tool, or documentation is no longer available to the original equipment manufacturer;
 - (C) the documentation or tool is used by the original manufacturer itself only to perform, at no cost, diagnostic services virtually through telephone, internet, chat, email, or other similar means that do not involve the manufacturer physically handling the customer's equipment, unless the manufacturer also makes the documentation or tool available to an individual or business that is unaffiliated with the manufacturer.
 - (ii) Require an original equipment manufacturer to divulge any trade secret, including documentation that includes, but is not limited to, schematics and bill of materials involving printed motherboards, or license any intellectual property, including copyrights or patents, to any independent repair provider or owner.
 - (iii) Require an original equipment manufacturer or an authorized repair provider to provide an independent repair provider or owner any information, other than "documentation" as defined herein, that is provided by the original equipment manufacturer to an authorized repair provider.
 - (iv) Require an original equipment manufacturer or authorized repair provider to make available any parts, tools or documentation for the purposes of modifying or making modifications to any digital electronic equipment.

- (v) Require any original equipment manufacturer or authorized repair provider to make available any parts, tools, or documentation in a manner that is inconsistent with or in violation of any federal or state law.
- (vi) Require an original equipment manufacturer to make available parts, tools, or documentation to an independent repair provider or owner that would disable, reset, or override electronic security locks or other security-related measures or functions, or disable or override anti-theft security measures set by the owner of the digital electronic equipment.
- (vii) Prevent original equipment manufacturers from restricting access to certain secure parts of a device from independent repair provider or owner access, provided that it does not prevent independent repair providers from completing repairs that can be completed by authorized repair providers.
- (viii) Prevent original equipment manufacturers from requiring remote authorization or an internet connection before independent repair providers or owners may use such parts or tools.
- (ix) Prevent an original equipment manufacturer from establishing reasonable training and certification programs for repair providers and requiring ongoing certification to these programs as a condition for receiving parts, tools, and documentation.
- (x) Prevent an original equipment manufacturer from requiring that independent repair providers and owners agree to reasonable commercial terms, including disclosures regarding the use of non-genuine or used parts.
- (xi) Abrogate, interfere with, contradict, or alter the terms of any agreement between an original equipment manufacturer and an authorized repair provider, including, but not limited to, the performance or provision of warranty or recall repair work by an authorized repair provider on behalf of an original equipment manufacturer pursuant to such an authorized repair agreement, except that any provision in such an authorized repair agreement that purports to waive, avoid, restrict, or limit an original manufacturer's compliance with this bill shall be void and unenforceable.
- (xii) Prevent an original equipment manufacturer from providing parts, such as integrated batteries, to independent repair providers or owners pre-assembled with other parts rather than as individual components, provided that those pre-assembled parts or their equivalents are also available to authorized repair providers.
- (xiii) 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.

- (xiv) Require an original equipment manufacturer to provide or make available source code.
 - (xv) Require an original equipment manufacturer to provide parts, tools, or documentation for repair of digital electronic equipment critical to the safety of life or health of individuals, or for repairs that could threaten the safety of life or health of individuals, including repairs to digital electronic equipment with internal switch-mode power supplies.
 - (xvi) Require an original equipment manufacturer to provide documentation or tools used exclusively by the original equipment manufacturer for diagnosis, maintenance or repairs completed by machines that operate on several digital electronic equipment products simultaneously or otherwise for purposes of large scale efficiency, if the original equipment manufacturer makes available to owners and independent repair providers sufficient alternative documentation and tools to effect the diagnosis, maintenance, or repair of the digital electronic equipment.
 - (xvii) Apply to a product that was originally made available for sale by the original equipment manufacturer before the effective date of this bill.
- (e) This bill shall not apply if the manufacturer provides to the original purchaser either one of the following:
- (i) a reimbursement; or
 - (ii) equivalent or better, readily available replacement digital electronic equipment at a price that is no more than the total cost of the sum of the parts.

Section 3. Limitation of liability.

- (a) No original equipment manufacturer or authorized repair provider shall be liable for any damage or injury to any digital electronic equipment, person, or property that occurs as a result of repair, diagnosis, maintenance, or modification performed by an independent repair provider or owner, or any other use of parts, tools, or documentation provided by an original equipment manufacturer, including but not limited to, any indirect, incidental, special or consequential damages; any loss of data, privacy or profits; or any inability to use, or reduced functionality of, the digital electronic equipment.
- (b) No original equipment manufacturer shall be liable under this bill for any act that is reasonably necessary to protect user privacy, security, or digital safety.
- (c) Original equipment manufacturers shall not be required to warrant any repairs provided by independent repair providers or owners.

- (d) No original equipment manufacturer shall be liable for improper use of personal data or any data privacy or security breach in connection with repair, diagnosis, maintenance, or modification performed by an independent repair provider or owner.

Section 4. Notice and consumer bill of rights.

- (a) Before repairing digital electronic equipment, independent repair providers shall provide to any customer, and publish on their website and the place of business, a written notice that contains the following information:
 - (i) The independent repair provider is not an authorized repair provider for the digital electronic equipment;
 - (ii) The consumer should review the terms and conditions of any warranty for the digital electronic equipment, as repairs not performed by an authorized repair provider may affect the warranty;
 - (iii) Warranties for consumer products are governed by the federal Magnuson-Moss Warranty Act (15 U.S.C. ch. 50 § 2301), which gives consumers rights and protections that apply over conflicting provisions in the warranty;
 - (iv) Under the Magnuson-Moss Warranty Act, a warranty cannot require that maintenance and repairs be performed only by an authorized repair provider;
 - (v) Under the Magnuson-Moss Warranty Act, if damage to equipment is shown to be caused by equipment not offered or sold by the original equipment manufacturer or by faulty repair performed by a non-authorized repair provider, that damage may not be covered by the warranty, but the warranty may otherwise remain in effect; and
 - (vi) All required disclosures as outlined in Section 4(b) below.
- (b) Consumer bill of rights. The below requirements shall apply to all independent repair providers that conduct repairs of digital electronic equipment covered by this bill using documentation, tools, or parts provided by original equipment manufacturers pursuant to this bill.
 - (i) Independent repair providers are required, prior to the repair of such digital electronic equipment, to disclose to consumers in writing and obtain a written acknowledgment of the following:
 - a. For each instance of service provided, what parts, if any, were not provided or produced by the original equipment manufacturer, the name of the parts provider, and any complaints about the quality of

such parts that the independent repair provider knows or has reason to know;

- b. If used parts are to be used during the repair, the duration and type of the part's previous use;
 - c. The total anticipated cost of the repair, including the itemized cost of parts and labor;
 - d. Whether the technician performing the repair is certified or has completed training to repair such digital electronic equipment, including whether the technician has undergone training required by the original equipment manufacturer to ensure safe and effective repairs;
 - e. Whether the repair procedure is in compliance with any applicable building or electrical code;
 - f. That there is a risk of damage to digital electronic equipment during the repair, including but not limited to damage to battery life or software functionality;
 - g. That there is a risk of physical harm to the consumer from an improper repair, including but not limited to increased risk of digital electronic equipment fire from faulty battery installation; and.
 - h. Any exposure of the consumer's personal data that may be involved in the repair, including access to personal data by independent repair provider's staff, and the protections that the independent repair provider will take to safeguard personal data.
- (ii) Independent repair providers are required to keep documentation of all repairs, including whether such repairs involved parts not provided or produced by original equipment manufacturers, and provide such documentation to consumers once repairs are completed.
- (iii) Independent repair providers are required to submit, to any publicly accessible registry of such repairs, certain data regarding all digital electronic equipment repairs performed without original equipment manufacturer authorization. Such data must include the make, model, serial number, date of repair service, and summary of service performed, but not any personal data regarding the consumer.
- a. As an alternative to compliance with this Section 4(b)(iii), for any repair performed by an independent repair provider without original equipment manufacturer authorization, independent repair providers must permanently attach a notice of repair containing their own brand

name to the digital electronic equipment, with the brand name in a size no smaller than the brand of the original equipment manufacturer.

Section 5. Enforcement.

- (a) The Attorney General shall have exclusive authority to enforce the provisions of this bill. Subject to Section 5(b), the Attorney General may initiate an action in the name of the State to seek an injunction to restrain any violations of this bill, and seek to obtain any relief that the Attorney General is authorized to obtain under [State UDAP statute].
- (b) Prior to initiating any action under this bill against any individual or business, the Attorney General shall provide the individual or business 30 days' written notice identifying the specific provisions of this bill the Attorney General alleges have been or are being violated. If within the 30-day period the individual or business cures the noticed violation and provides the Attorney General an express written statement that the alleged violations have been cured and that no such further violations shall occur, no action shall be initiated against the individual or business. Written notice by the Attorney General shall be delivered by certified mail and by first-class mail with proof of mailing. If an individual or business continues to violate this chapter following this cure period or breaches an express written statement provided to the Attorney General under this Section 5(b), the Attorney General may initiate an action as described in Section 5(a).
- (c) Nothing in this bill shall be construed to create an individual or private right of action, or to provide the basis for, or be subject to, an individual or private right of action for violations of any parts of this bill, including under any other law.

Section 6. Effective date. This bill shall take effect one year after it shall have become a law and shall apply only to digital electronic equipment that was manufactured for the first time, and first sold or used in the State, on or after the date that is one year after this bill becomes law.



March 17, 2026

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

Re: Alarm Industry Concerns About HB 162 – the Digital Right-to-Repair Act

Dear Co-Chairs Himschoot and Mears and Members of the Alaska House Community & Regional Affairs Committee:

We are writing on behalf of the Alarm Industry Communications Committee (AICC)¹ and the many central station alarm companies represented within its membership (including numerous companies that operate in the State of Alaska), to express AICC’s concerns about the current version of HB 162, the Digital Right to Repair Act (the “Act”). AICC respectfully requests that the House Community & Regional Affairs Committee refrain from advancing HB 162 without an appropriate amendment to establish that electronic security and life safety systems are excluded from the scope of the Act.

AICC does not oppose the concept of expanding Alaskans’ freedom to repair the vast majority of consumer electronic devices. However, the Act as currently written would require alarm companies to release “documentation” to owners or independent repair providers upon request, which includes any manual, diagram, reporting output, service code description, schematic diagram, security code, passwords, or other sensitive information that is necessary to diagnose, maintain, or repair the equipment. Manufacturer-specific alarm system access codes (different from passwords), schematics, radio communications and cybersecurity information can help someone figure out how to disable the system, and through accidental release or hack could end up on the dark web and be used to unlock or disable similar alarm systems of many consumers and businesses across the U.S. With this information, a bad actor could drive around a community and look for signs and stickers advertising a particular alarm company and

¹ AICC is a committee formed by The Monitoring Association (TMA), representing the vast majority of entities providing central station alarm security protection services. The Electronic Security Association (ESA) (representing security and fire alarm service providers) and the Security Industry Association (SIA) (representing alarm system manufacturers) are important members of AICC. Central station alarm operations protect tens of millions of families in their homes, a wide range of hospitals, businesses, public utilities and key government facilities (including military installations).

potentially be able to override their alarm system. Not only would alarm panels be impacted but also security cameras, motion detectors, door sensors and more.

Fire alarm systems and medical devices would also be made vulnerable to not just bad actors but also negligent ones. Fire alarm technicians are given rigorous training and, in most states (including Alaska), require certification to inspect, repair, and install these systems. If a landlord attempts to repair a fire alarm, monitored smoke detector, or sprinkler system and they are not qualified to do so, it could endanger lives of numerous tenants. Medical pendants that are improperly repaired leave the life of the pendant wearer in jeopardy. Any exemption language for medical devices that is added to the bill must therefore also exempt medical alerting equipment such as Personal Emergency Response Systems (PERS) or mobile Personal Emergency Response Systems (mPERS).

AICC respectfully submits that the Act and the safety and security of Alaska’s residents and businesses would be improved by creating an exemption for security or life safety systems and devices, and providing a definition for these systems and devices, to ensure that consumers who have purchased alarm systems may continue to rely on the protections these systems afford:

Sec. 45.45.895. Exemptions. (a) The provisions of AS 45.45.800 - 45.45.899 do not apply to

[...]

(3) security or life safety systems and devices, or to manufacturers of security or life safety systems and devices.

[...]

(c) In this section, “security and life safety systems and devices” means a product designed to prevent, detect, protect against or respond to security incidents or safety hazards impacting individuals or property, including, but not limited to:

(1) a fire alarm

(2) a medical alert

(3) intrusion detection

(4) video security

(5) an access control system or device

Nearly all states that have adopted a right to repair law to date have specifically excluded fire and security systems, including Colorado, California, Oregon, Washington, Connecticut, Texas and New York; and proposed legislation in other states such as Illinois, Massachusetts and Pennsylvania has included similar exclusions. Several of these states are recognized as some of the most consumer-protective jurisdictions in the nation.

The security and life safety industry is quite literally in the consumer protection business and takes this mission very seriously. Security and life safety employees undergo extensive training and background checks to ensure that the technicians who are sent into customers' homes and businesses can be trusted. Right to repair legislation has the potential to inadvertently jeopardize the safety of residents and businesses of Alaska and erode trust in our industry, at a time when concern for public safety is at an all-time high and the incidence of hacking and misuse of sensitive information is rapidly increasing. We would welcome any opportunity to discuss this matter with you should you have any questions. To arrange a teleconference, please contact our counsel, Mr. John Prendergast at (202) 828-5540 (or jap@bloostonlaw.com) or Mr. Cary Mitchell at (202) 828-5538 (or cary@bloostonlaw.com).

Respectfully submitted,

**ALARM INDUSTRY COMMUNICATIONS
COMMITTEE**



Tiffany Galarza, Co-Chair
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7918 Jones Branch Drive, Suite 510
McLean, VA 22102
703-242-4670
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DATE: March 19, 2026
TO: House Community & Regional Affairs Committee
FROM: The Entertainment Software Association
RE: House Bill 162, Right to Repair -OPPOSE UNLESS AMENDED

Dear Chair Himschoot and Members of the House Community & Regional Affairs Committee:

The Entertainment Software Association (ESA) is the U.S. trade association representing the publishers of computer and video games for play on consoles, personal computers, mobile devices, and the Internet. The video game industry is a key economic sector that creates jobs, develops innovative technology, and keeps the United States competitive in the global marketplace. Not only do 75 percent of United States households have at least one gamer in their home, but our industry has a footprint that creates jobs in every state.

ESA asks that this committee exempt video game consoles from the scope of any digital right to repair proposals due to concerns that permitting console access to independent repair providers, over whom we have no oversight, could result in the modification of hardware and firmware that could compromise the vital security features that provide a secure environment for the playback of copyrighted games. While the majority of repair shops would likely not use the provided tools and documentation for any illegal purposes (e.g., removal of security features), it would only take a few bad actors sharing information on social media for this bill to have a rapid and severely detrimental impact on the industry. Similar legislation that passed in other states, California and Minnesota in 2023; Colorado and Oregon in 2024; and Connecticut, Texas, and Washington in 2025 recognized the significant threat posed and the importance of copyright protection to video game consoles by exempting consoles from the scope of their laws. ESA's exemption contains a narrowly-tailored definition of video game console to ensure only the intended products are excluded from the scope of this legislation. The definition that was agreed upon in the other states is outlined below for your reference.

A "Video Game Console" means a computing device, such as a console machine, a handheld console device, or another device or system, and its components and peripherals, that is primarily used by consumers for playing video games but which is neither a general nor an all-purpose computer. A general or all-purpose computer includes, but is not limited to, a desktop computer, laptop, tablet or cell phone.

ESA is also concerned with Right to Repair proposals which fail to specifically address copyright protection and potential conflicts with well-established technologies to protect intellectual property. ESA video game console makers employ digital locks designed to protect their game consoles and provide a secure media environment for players and other video game publishers and developers. These protections, known as technological protection measures ("TPMs"), are so critical to copyright holders that they have been protected by international treaties since 1996. Since then, over 100 countries have implemented protection for TPM in their own laws. Moreover, in October 2021, the U.S. Copyright Office (the "Office"), in the context of statutorily

mandated administrative rulemaking, reviewed whether TPMs can be circumvented for the purpose of repairing consumer electronics. As in earlier rulemakings, the Office stated that video game consoles are unique in the consumer electronics marketplace because of the valuable copyrighted content available to play on them and that there is a real threat of piracy if game console TPMs were modified. Given the circumstances, the Office recommended that a very limited exemption should be adopted that would allow circumvention *only* to repair broken optical drives on consoles *and* that the circumvented TPMs must be restored to their original functionality after repair of those optical drives.

In addition to the Copyright Office, the Federal Trade Commission (FTC) has also acknowledged that video game console makers and game publishers rely on the content protection systems built into consoles to protect against sophisticated piracy efforts. In fact, in its report, “Nixing the Fix: An FTC Report to Congress on Repair Restrictions” (“FTC Report” or “Report”), the FTC recognized that protecting intellectual property (“IP”) rights benefits consumers and that regulation regarding repair restrictions cannot be one-size-fits-all. Indeed, the Report makes a special effort to recognize that IP rights play a valuable role in encouraging and rewarding innovation, and that “any action taken by industry or regulators to enable independent repair should seek input from such entities (i.e., the U.S. Copyright Office) and other stakeholders and be mindful of existing law and policy supporting IP protection.” Accordingly, if adopted, broad Right to Repair laws would reverse established Copyright Office and FTC precedent, with potentially harmful unintended consequences to consumer and company protections.

Finally, ESA is also concerned that Right to Repair proposals may be burdensome and unnecessary, as ESA console makers’ success depends on consumers having reliable, versatile, and engaging platforms on which to play video games and enjoy digital content. For that reason, ESA’s video game console makers —Microsoft, Nintendo, and Sony—are committed to providing consumers with repairs that are quick, reliable, and secure. In addition, they also offer a variety of repair options for consoles that include repair services beyond the warranty period to ensure that their consoles remain in good working order

We appreciate the opportunity to provide testimony and your consideration of our concerns regarding Right to Repair legislation in Alaska. We would be happy to follow up with any additional information as needed.

Sincerely,

Andrew O’Connor
Director, State Government Affairs
Entertainment Software Association



March 17th, 2026

The Honorable Donna Mears
Co-Chair
House Committee on Community and Regional Affairs
State Capitol Room 102
120 Fourth Street, Juneau, AK 99801

The Honorable Rebecca Himschoot
House Committee on Community and Regional Affairs
State Capitol Room 411
120 Fourth Street, Juneau, AK 99801

Re: H.B. 162: Digital Right to Repair – Oppose

Dear Co-Chair Himschoot and Co-Chair Mears,

The Marine Retailers Association of the Americas (MRAA) and the National Marine Manufacturers Association (NMMA) would like to thank you for the opportunity to provide feedback on H.B. 162 as written. While we understand the intent of this legislation to expand repair options for consumers, we respectfully ask the Committee to oppose this bill due to significant safety and compliance concerns that could negatively impact the marine industry.

The Marine Retailers Association of the Americas (MRAA) is the leading trade association of North American small businesses that sell and service new and pre-owned recreational boats and operate marinas, boatyards, and accessory stores. MRAA represents more than 1,300 individual member retail locations and conducts advocacy efforts on their behalf, including 12 members located in Washington State.

The National Marine Manufacturers Association (NMMA) is the premier trade association for the U.S. recreational boating industry, representing nearly 1,300 marine businesses, including recreational boat, marine engine, and accessory manufacturers. Our members are often U.S.-based small businesses, many of which are family owned. NMMA members collectively manufacture more than 85 percent of the marine products sold in the U.S. Furthermore, the recreational boating industry has a \$230 billion impact on the nation's economy and in communities across the country, with 812,000 American jobs across 36,000 U.S.-based marine businesses. In Washington State alone, NMMA represents 24 members with recreational boating contributing \$8.1 billion in annual economic impact.

Boating is a major part of Alaska's history and continues to be one of the favorite pastimes in the state today among both residents and visitors alike. There are more than 46,000 registered boats in the Last Frontier, which support a vibrant and growing outdoor recreation economy. In Alaska, recreational boating alone supports over 3,000 jobs at more than 300 businesses and ultimately contributes \$747.4 million to the state economy annually. Simply put, boating means business throughout Alaska.

While we do not question the intent of H.B. 162, we are concerned that its broad language could inadvertently undermine important safety emissions and compliance standards essential to the safe operation of marine vessels. If passed as written, this legislation would provide unauthorized access to software, specialized tools, and mechanical, electrical, safety, and emissions features that are integral to marine engine and electronic products. Unrestricted access to such information could compromise safety features crucial for navigation and the safe operation of a vessel, like radar, GPS, and engine management systems.

Additionally, we do not oppose a consumer's right to make repairs on their equipment, and in fact many of our members work with their customers to provide the required parts and train them to do simple repairs on their boats independently. We do, however, oppose providing access to the proprietary code of the products our members sell due to concerns of safety, emissions, compliance, and product reliability. Providing this level of access to untrained individuals would negatively affect the products' compliance with federal safety, security, and emission standards. Not only is there a risk of putting consumers and the boating public in danger, but marine manufacturers are also required by U.S. Environmental Protection Agency (EPA), under 40 CFR 1068.50 to ensure "adjustable parameters"¹ are unable to be tampered with by unauthorized technicians, ensuring engines maintain their safety and emissions protocols.

However, the extent of that access is strictly limited by the EPA and the Clean Air Act. To comply with Clean Air Act and meet EPA mandates, recreational marine engine manufacturers cannot provide access to pollution control devices. In guidance issued on Nov. 23, 2020, by Susan Parker Bodine, EPA Assistant Administrator for Enforcement and Compliance Assurance, tampering with emission controls is a federal offense. Manufacturers are the gatekeepers. They must ensure that access to the software controlling an engine's emissions only be made available to those who can be expected to adhere with Clean Air Act mandates and to keep emission tolerances within federally required levels. Original Engine Manufacturers must limit access to these highly regulated sections of software to factory-trained and certified technicians, and even then, some access points are only available to representatives of the manufacturer. As Ms. Bodine states in the official guidance:

*"Section 203(a)(3) of the [Clean Air] Act prohibits tampering with emissions controls and prohibits making and selling products with a principal effect of bypassing, defeating, or rendering inoperative emissions controls. The prohibitions in section 203(a)(3) apply to all vehicles, engines, and equipment subject to the certification requirements under section 206 of the Act, or other design requirements in the Act or regulations. This includes... nonroad vehicles (e.g., all-terrain vehicles, off-road motorcycles) and nonroad engines (e.g., marine engines, engines used in generators, lawn and garden equipment, agricultural equipment, construction equipment). Certification requirements include those for exhaust or "tailpipe" emissions, evaporative emissions, and onboard diagnostic systems."*²

H.B. 162 must account for federal anti-tampering requirements as well as emissions and safety standards.

Furthermore, marine manufacturers and dealerships have invested millions of dollars in educating and training their technicians and obtaining certifications that qualify them to properly service their products. Marine manufacturers put their confidence in certified dealers and technicians to maintain a given engine through its lifetime. This legislation stands to possibly undercut this important aspect of marine dealer's businesses while potentially putting consumers and customers at risk.

¹ [eCFR :: 40 CFR 1068.50 -- Adjustable parameters.](#)

² Bodine, S. (2020, November 23). Memorandum: EPA Tampering Policy: The EPA Enforcement Policy on Vehicle and Engine Tampering and Aftermarket Defeat Devices under the Clean Air Act. United States Environmental Protection Agency. Washington D.C.

For these reasons, MRAA and NMMA oppose H.B. 162 and respectfully urge you to protect the boating industry in Alaska State by opposing H.B. 162.

Thank you for your time and consideration of our request. Please contact either of us at Chad@mraa.com or Evillanueva@nmma.org if you should have any questions.

Sincerely,

Chad Tokowicz
Government Relations Manager
Marine Retailers Association of the Americas

Emily Villanueva
Western Government Relations Manager
National Marine Manufacturers Association



**MOTORCYCLE
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March 17, 2026

The Honorable Rebecca Himschoot
Co-Chair, House Community and Regional
Affairs Committee
State Capitol
Juneau, AK 99801

The Honorable Donna Mears
Co-Chair, House Community and Regional
Affairs Committee
State Capitol
Juneau, AK 99801

RE: HB 162 AMENDMENT REQUEST– Exclude Off-Highway Vehicles

Dear Co-Chair Himschoot and Co-Chair Mears:

The Motorcycle Industry Council (MIC)¹, the Specialty Vehicle Institute of America (SVIA)², and the Recreational Off-Highway Vehicle Association (ROHVA)³ represent several hundred companies in the powersports industry. **We urge that HB 162 be amended to specifically exclude off-highway vehicles from the scope of the bill’s provisions like Colorado, Massachusetts, Minnesota, and New York have done.** Given the exclusion of motor vehicles in HB 162 we don’t believe it is the intent to capture powersports vehicles and we are requesting an amendment to ensure that exclusion.

Frequently, legislation that has been introduced includes overly broad requirements for the majority of consumer products. Motor vehicles are appropriately excluded from most digital right to repair legislation, including HB 162. However, the “motor vehicle” definition used in such legislation only applies to vehicles operated **on highways**. As a result, off-highway vehicles such as dirt bikes, all-terrain vehicles, and recreational off-highway vehicles (side-by-sides) are thereby captured and subject to the provisions of digital right to repair legislation. As you certainly know, in Alaska off-highway vehicles are used almost as much as the on-highway vehicles that are excluded from your legislation.

We have serious safety concerns relating to the inherent danger of allowing non-factory trained technicians, untrained mechanics, and owners to perform certain work on off-highway vehicles if they are captured under any digital right to repair legislation. Unlike typical digital electronics such as cellphones, manipulating of powersports emissions or safety controls, whether intentionally or unintentionally, could lead to product failure and even cause injury or death. Manufacturers require dealers to attend regular technical training programs to instruct them on how to use the website and specialty tools and receive highly technical training. This training and knowledge is extensive and vital to ensure the correct repair of the product line.

Digital right to repair legislation capturing off-highway vehicles would economically harm Alaska franchised dealers, which are primarily small businesses. Dealers have invested heavily in training, special tooling, and equipment to service vehicles. This investment is substantial in terms of both time commitment

¹ The Motorcycle Industry Council (MIC) is a not-for-profit, national trade association representing several hundred manufacturers, distributors, dealers and retailers of motorcycles, scooters, motorcycle parts, accessories and related goods, and allied trades.

² The Specialty Vehicle Institute of America (SVIA) is the national not-for-profit trade association representing manufacturers, dealers, and distributors of all-terrain vehicles (ATVs) in the United States. SVIA’s primary goal is to promote safe and responsible use of ATVs.

³ The Recreational Off-Highway Vehicle Association (ROHVA) is a national, not-for-profit trade association formed to promote the safe and responsible use of recreational off-highway vehicles (ROVs – sometimes referred to as side-by-sides or UTVs) manufactured or distributed in North America. ROHVA is also accredited by the American National Standards Institute (ANSI) to serve as the Standards Developing Organization for ROVs. More information on the standard can be found at <https://rohva.org/ansi-standard/>.

for training and a monetary commitment for special tools and their facility. If tools and technical information are provided to customers and unauthorized independent repair shops, the franchised dealer's investment is compromised. In 2024, the value of the powersports retail marketplace in Alaska was \$338 million with an estimated 9,800 new powersports retail sales and 54 powersports retailers in the state.⁴

Litigation risk is another concern associated with allowing non-factory trained technicians to perform certain work on off-highway vehicles. If environmental or safety override attempts result in clean air violations, destruction of property, injury, or death, manufacturers are likely to be swept up in lawsuits, regardless of who may be liable for such damage and injuries.

In 2023, New York (AB 7006 and SB 4104) and Minnesota (SF 2744), and in 2024, Colorado (HB 1121) enacted digital right to repair legislation that specifically excluded both motorcycles and off-highway vehicles from the digital right to repair provisions. We urge that HB 162 be amended, similar to what New York, Minnesota, and Colorado recently enacted:

(7) "motor vehicle" means a vehicle designed for transporting persons or property on a street or highway and certified by the manufacturer under all applicable federal emissions standards and requirements for distribution and sale in the United States, including motorcycles, mopeds, and off-road (non-road) equipment, including but not limited to all-terrain sports and recreational vehicles (including racing vehicles);

Sponsors of similar bills in other states have also incorporated these suggested edits. It is inappropriate to include any type of motor vehicle, off-highway vehicle, and recreational vehicles in the scope of a law designed to address the digital right to repair of consumer electronics, and we respectfully request that HB 162 exclude these vehicles.

Thank you for your consideration of our comments. Should you have any questions, please contact me at 571-684-6144.

Sincerely,



Scott P. Schloegel
Senior Vice President, Government Relations
Motorcycle Industry Council
Specialty Vehicle Institute of America
Recreational Off-Highway Vehicle Association

cc: House Community and Regional Affairs Committee Members

⁴ Motorcycle Industry Council's 2024 "Economic Impact of the Powersports Industry"



1812 N. Moore Street, Suite 2200
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703.841.3200

March 19, 2026

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

Before House Community and regional Affairs Committee

In Opposition to HB162:
Right to Repair Legislation

Chair Himschoot and Committee members —

I am Mark Ourada, Director of Government Affairs for the National Electrical Manufacturers Association (NEMA).

NEMA represents the interests of over 300 leading manufacturers in the *Electroindustry* supporting more than 2.2 million American workers, generating more than \$197.39 billion in labor income annually! In Alaska, the electroindustry supports 228 jobs with labor income exceeding \$20 million.

A major part of NEMA's work is to provide policy leadership and market intelligence—along with setting standards for the safe, efficient, and innovative electrical products and systems our member companies create that are making the future electric for our homes, workplaces, schools, and healthcare facilities. NEMA does not manufacture products or advocate specific chemical uses but rather works to ensure policy is grounded in fact-based risk, actual exposure, and sound science.

With over 50 product lines—including batteries, lighting, the electric grid, EV products, cybersecurity, and more—NEMA member products are essential to daily life and public safety.

On behalf of the hundreds of manufacturers and businesses our association represents, we respectfully oppose HB162 in its current form.

SCOPE OF LEGISLATION:

Almost all Right-to-Repair bills across the country are aimed at what we would term 'consumer electronic products, ensuring that individuals are able to repair phones, computers, and other personal electronic devices. These bills recognize that the primary concern of consumers is this family of products.

If that is the author's intention for this bill, it would be extremely helpful, and appropriate, to be clear that this legislation is *not* intended to affect business-to-business or business-to-government transactions.

These transactions are significantly different, and the people/companies involved have greater experience and knowledge in safely and appropriately dealing with repair issues.

LIGHTING ISSUES:

NEMA has multiple companies that manufacture lighting components. HB162 does not specifically address this area, but we believe all lighting products should be exempt from R2R laws because it is unsafe for any untrained person to repair *any* electrical equipment, especially products the manufacturer has intended not to be repairable.

By using the overly broad definition "digital electronic equipment," this legislation *unintentionally* puts consumer products, like smart light bulbs and lighting equipment, within its scope.

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.*"

This issue can be easily remedied by inserting on page 4 after line 7 (C) **light bulbs, lighting equipment, and systems not including component parts that are not meant to be repairable but just replaceable.**

SAFETY:

NEMA members put a premium on producing products with a major concern on safety. We have concerns when R2R language does not appropriately address safety issues when discussing repair. This applies to all products but is certainly appropriate when it comes to lighting as these products are ubiquitous in the home.

This can easily be addressed by including the following language. It will avoid any confusion when this legislation goes into effect:

“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, code, or where doing so will create an unsafe operating condition.”

INTELLECTUAL PROPERTY ISSUES:

Today, with software (i.e., firmware) imbedded in so many products, this legislation puts at risk the intellectual property that NEMA member companies develop at substantial cost.

Protecting proprietary intellectual property is a priority for OEMs. Companies spend multiple years and significant amounts of money and labor to innovate, develop and manufacture products.

NEMA is suggesting language that would prevent *indirect* disclosure of trade secrets through access to firmware, encryption keys, diagnostic tools, or similar mechanisms by inserting on page 4, line 3 (a): ***or provide any means by which a trade secret could be ascertained or indirectly disclosed.***

INDEPENDENT PROVIDER ISSUES:

HB162 would require original equipment manufacturers (OEMs) to provide independent repair-providers with diagnostic and repair information, software, tools, and parts—but without requiring any of the critical consumer protections (such as training and competency certification) that authorized repair networks provide.

Manufacturers offer authorized repair networks to provide consumers with the assurance that their products are serviced by trained and vetted repair professionals who have the necessary skills to repair electronic products safely, reliably, and accurately.

Without proper vetting of repair providers and of the repair process, the potential for consumer harm is significant. It also undermines the innovations manufacturers have developed to protect customers, as well as the protection of their repair-related intellectual property.

When an electronic product breaks, consumers have a variety of professional repair options, including using an OEM’s authorized repair network, which often includes local repair service providers as well as mail-in, and even in-house, repair options for some categories of products. Consumers may also choose to use one of the many independent repair providers, although they do so without the quality assurance provided by using a manufacturer’s authorized network repair provider. The free-market economy provides a

wide range of consumer choices for repair with varying levels of quality, price, and convenience without the mandates imposed by the legislation.

CONCLUSION:

As a former legislator, I understand the challenges you face in balancing various interests and avoiding unintended consequences, so I thank you for your time and attention. Our members take these issues very seriously. Thus, as a regular course of business they have taken, and continue to take, measures to ensure consumers have both options *and* qualified individuals to repair their products.

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 encourages the committee to take a careful look at the suggestions we have made to amend the current language.

Thank you for your time and attention.

Mark Ourada
Director, State Government Affairs
The National Electrical Manufacturers Association



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AHAM.ORG

TESTIMONY

JOHN KEANE
MANAGER OF GOVERNMENT RELATIONS

ON BEHALF OF
THE ASSOCIATION OF HOME APPLIANCE MANUFACTURERS

BEFORE THE ALASKA STATE LEGISLATURE
HOUSE COMMITTEE 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:

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

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
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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.

CRAIG TAYLOR EQUIPEMENT
Anchorage, Fairbanks, Soldotna, Wasilla

IN OPPOSITION TO: HB162
HB 162 – Digital Right to Repair Act

Via Electronic Mail:

Senate Labor and Commerce Committee

CRAIG TAYLOR EQUIPMENT OPPOSES HB 162

Co-Chair Himschoot, Co-Chair Mears and Committee Members -

My name is Chris Devine, and I am President of Craig Taylor Equipment, a family-owned and operated dealership serving contractors, farmers, commercial trucking, homeowners, and municipal, state, and federal agencies since 1954.

Our company offers a wide range of construction, on-road trucks, agricultural and maintenance equipment consumers from our locations in Anchorage, Fairbanks, Soldotna, and Wasilla. As a proud, Alaskan owned business, we have grown alongside our communities, employing approximately 100 of our friends and neighbors in parts, service, sales, and management.

We support our customers' right-to-repair. Our industry has taken significant steps to provide diagnostic tools, information, and technology innovation empowering them to choose when, where, and how they service their machinery.

Parts Sales Mandate (Sec. 45.45.840): *Manufacturers shall make available to and independent service provider or owner, documentation, parts and tools at the same most favorable terms as the manufacturer provides to an authorized service provider.*

Repair and service parts are readily available to on-road truck and off-road equipment owners and independent repairers in Alaska.

Our dealership maintains approximately \$8M in parts inventory, and in 2025, 75% of those parts were sold directly to customers and third-party repair providers who completed their own repairs and maintenance. We collaborate closely with customers and local independent repair providers to ensure they have the necessary parts and guidance to perform repairs correctly and safely.

This mandate will decimate the service parts business of equipment dealers across the State. The customer support infrastructure will deteriorate as dealer service parts revenues no longer provide an economic return on investment.

The unintended consequences will be higher machine costs to customers. Absent the economic benefit of parts revenue and profits, dealers will have no alternative other than to raise the price of machines as a means to maintain business and employment viability.

HB 162 will reduce access, not improve customer access, to service parts. **This unprecedented mandate is a lose / lose proposition for consumers, dealers, and the State.**

Documentation and Tools (Sec, 45.45.830). HB 162 seeks to make documentation and tools available to owners and independent repair providers.

The off-road equipment and the on-road truck industries readily make repair documentation and special tools accessible and available to equipment owners and independent repair providers. Information is available through our dealership and/or through our OEM websites.

It is unreasonable to require technical documentation and tools for highly sophisticated equipment be made available at no charge. Dealers pay for these assets and in the auto industry the customer and independent repair providers pay for these assets. OEMs incur significant costs in development, improvement and administration of documentation and tools, they should be allowed to recoup costs and reasonable profit.

Lack of Flexibility for Safety and Emissions: HB 162 does not provide the necessary flexibility to prevent illegal tampering with safety and emissions features. Some repairs require an internet connection and/or verification process to ensure compliance with safety and emissions specifications. HB 162 seeks to nullify this verification process, leading to disputes over when technologies can be used, potentially violating federal regulations and intellectual property protections.

Our technicians face safety danger whenever they encounter a machine that has been modified, and the technician is un-aware of the modification.

Excessively Broad Terms (45.45.899): Digital Product: “a product that depends for its functioning, in whole or in part, on digital electronics embedded in or attached to the product.”

On-road and off-road equipment is highly technical, often dangerous, and significantly more sophisticated and costly pieces of equipment that do not belong in the same regulation as consumer electronics.

The definition of “documentation” includes the words “other guidance or information.” This is a vague and ambiguous phrase that will cause unnecessary confusion and conflict among dealers, customers, and independent repair providers.

HB 162 does not define the terms "repair," "diagnosis," or "maintenance" in the context of restoring equipment to OEM specifications. Instead, it only states that parts, tools, and documentation would ensure “product’s functionality.” A piece of equipment can be

fully functional while having safety and emissions systems disabled. This language necessitates clarification.

The term “program’s data” – is not defined, is vague, and could extend to exposure of proprietary information and or trade secrets

This ambiguity is particularly troubling as we rapidly advance toward autonomous equipment and sophisticated precision trucking, construction, and farming technologies.

Exemption Amendment: We urge the committee to join other States by amending HB 162 to provide an exemption for these highly technical, often dangerous, and significantly more sophisticated and costly pieces of equipment.

Invitation for a Hands-on Discussion at our Location: We invite committee members to visit any of locations for a candid discussion about on-road trucks and off-road products, our customer commitment and repair tools that are available to the public.

I respectfully urge you to oppose the passage of HB 162 as currently written.

Thank you for your consideration.

A handwritten signature in black ink, appearing to read 'CT', with a horizontal line extending to the right.

President / CEO

Craig Taylor Equipment / Peterbilt of AK

Submitted Electronically

Written Testimony in Opposition

By

**Patricia M. Hanz, Vice-President of Regulatory Affairs
Truck and Engine Manufacturers Association**

Alaska HB 162

House Community & Regional Affairs Committee

March 19, 2026

Co-Chairs Himschoot and Mears, Vice Chair Hall and Members of the House Community & Regional Affairs Committee:

The Truck and Engine Manufacturers Association (EMA) opposes AK HB 162, and testified in opposition to its companion bill AK SB 111. While the legislation is described as a Digital Right to Repair Bill, for which a Model State Bill is available to properly scope the legislation to apply to personal consumer electronic devices, HB 162 is rather, a broad bill that attempts to apply the right to repair concept to a myriad of commercial products for which a legislative solution is simply not needed and will create issues between owners, service providers and manufacturers and create new risks to public health and safety.

EMA represents the world's leading manufacturers of commercial vehicles as well as on- and off-road engines used in applications such as trucks; buses; construction and farm equipment; locomotives; marine vessels; landscaping equipment; and stationary generators.

While the proposed "Digital Right to Repair Act" might seem innocuous, in fact it would create significant adverse unintended consequences to the products manufactured by EMA's members, as such requirements would provide unfettered access to change the microprocessors on engines and equipment that control critical safety, emissions, and performance systems. Legislation enabling such access is potentially dangerous and simply is not needed. Manufacturers already provide access to the diagnostic, maintenance and repair information needed to repair the vast majority of repairs. Manufacturers have programs available in which daily, weekly, monthly and yearly information can be provided to independent repair facilities and owners. In addition, it appears to prohibit manufacturers from charging for diagnostic, maintenance and repair documentation and software – essentially requiring manufacturers to give away technology which they have spent significant resources to develop.

EMA member products and the engines they power are often used in rural and remote settings. As a result, over the decades manufacturers have established a service network which includes independent dealers and owners/operators to help keep these vehicles and equipment working.

EMA met with the Sponsor to better understand the issues he is attempting to address with this bill. While we certainly understand some of the frustrations expressed by Senator Dunbar, the Sponsor of SB 111, some of the issues raised by the Senator in the Senate hearing are simply driven by geography and found in a wide range of service industries ranging from mail delivery to medical and emergency services. The bill does not resolve the challenge created by geography - it is simply expensive and logistically challenging to provide parts and services in rural and remote settings.

The major manufacturers of agricultural equipment entered a Memorandum of Understanding with the American Farm Bureau Federation in 2023 which documents the arrangement under which access will be provided and the obligations and responsibilities of the signatories. Importantly, there is a continuing commitment to meet on a regular basis to assess the MOU and update it based on operational concerns or technological advancements. The parties to the MOU have met 4 times since its inception to review and update the implementation details. In addition, there is a public website on which ANY owner/operator may file a complaint and, to date, few complaints have been filed. Those that have been filed have been quickly resolved. These are clear indications that the MOU is working to make legislation unnecessary.

Repairing large, complex, and specialized products manufactured by EMA members require highly trained and skilled personnel, who are qualified to properly use service and repair information. Allowing untrained individuals and the public to have unfettered access to service information is dangerous and unnecessary. Further, it will undermine the integrity of the equipment and allow for safety features on agricultural equipment – such as braking systems and electronic stability (anti-rollover) controls – to be altered and compromised. Unfettered access also will increase the likelihood that untrained personnel will intentionally or unintentionally, and illegally, alter or disable federally mandated emission control systems. Such illegal tampering is increasingly occurring today, especially on off-highway equipment. Tampering contributes substantial excess pollution that harms public health and air quality. The U.S. EPA has undertaken a National Compliance Initiative to respond to the numerous instances of engine tampering across the country, some of which include the use of software to alter or disable digitally controlled emission technologies. Further, a listing of those cases that have been resolved is also available on EPA’s website. In addition to safety and emissions concerns, allowing access to software that controls federally regulated systems also exposes owners and operators to both civil and criminal liability for tampering. The U.S. Department of Justice’s Energy and Natural Resources Division announced a consent decree and settlement of one such case, resulting in \$3.1 million in criminal fines and civil penalties for the sale of devices designed to delete emissions controls.

Further, proposed repair legislation consistently fails to contain meaningful safeguards or restrictions that would prevent or mitigate the risk of cybersecurity incidents. Widespread and unfettered access to service information increases the opportunity for hackers to improperly obtain or tamper with such information – creating enormous cybersecurity risks. Legislation to make those efforts easier is ill advised and unnecessary. The “open access platform” envisioned by the legislation simply does not exist. The cybersecurity risk and the risk associated with the broad ability to remotely access and send commands that control equipment critical safety systems has been recognized by federal agencies including the National Highway Traffic Safety Commission (NHTSA).

EMA and its members support and have worked with regulatory agencies (including U.S. EPA) to develop programs to expand the availability of service and repair information to qualified independent service repair personnel. Those programs and regulations include safeguards and restrictions needed to mitigate the risk of the unfettered release of safety and emissions control tools and other proprietary information. Such regulations also provide the same set of requirements across the country, in contrast to legislation that would mandate special state-based requirements that, if enacted, would actually hurt Alaskan businesses.

For all these reasons, EMA has serious concerns with the proposed “Digital Right to Repair Act”. Such requirements otherwise will create enormous safety, environmental, and security risks and liability exposure for owners and the public and will limit the availability – and/or increase the costs – of products sold in Alaska, as those products will be forced to have unique characteristics.

Thank you for the opportunity to provide our Written Testimony. If you have any questions or need additional information, please do not hesitate to contact me at: phanz@emamail.org, (312) 929-1979.

Attachment: Model Digital Equipment Bill

Copy to: Representative Dibert



The Voice of the Electronic Security & Life Safety Industry

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Dallas, TX 75261
P: 972.807.6800

ESAWEB.ORG

March 17, 2026

Re: ESA Concerns with HB 162 – Request for Exemption for Security and Life Safety Systems

Dear Co-Chairs Himschoot and Mears and Members of the Committee,

On behalf of the Electronic Security Association (ESA), which represents electronic security and life safety integrators, dealers, and monitoring companies nationwide, including those serving Alaska, we write to express concerns with HB 162, the Digital Right to Repair Act.

ESA supports the general goal of expanding consumer access to repair for many types of products. However, as currently drafted, HB 162 would unintentionally create serious risks to public safety by requiring the disclosure of sensitive information related to electronic security and life safety systems.

These systems, including fire alarms, intrusion detection, access control, video surveillance, and medical alert systems, are designed to protect homes, businesses, schools, and critical infrastructure. Unlike typical consumer electronics, they rely on secure configurations, restricted access credentials, and controlled system architecture to function safely and effectively.

The bill’s requirement to provide documentation, schematics, access codes, and other sensitive materials to third parties could enable bad actors to identify vulnerabilities and compromise systems. At the same time, allowing untrained individuals to service or modify these systems creates significant risks of improper installation or repair, which could result in system failure during emergencies.

Electronic security and life safety systems are installed, maintained, and monitored by trained professionals who are often licensed and subject to background checks and regulatory oversight. This professional ecosystem exists to ensure these systems operate reliably when they are needed most.

For these reasons, ESA respectfully requests that the Committee adopt an exemption for security and life safety systems and devices.

Recommended Amendment:

Sec. 45.45.895. Exemptions. (a) The provisions of this AA 45.45.800 – 45.45.899 do not apply to:

[...]

(3) security or life safety systems and devices, or to manufacturers of such systems and devices.

[...]

(c) In this section, “security and life safety systems and devices” means products designed to prevent, detect, protect against, or respond to security incidents or safety hazards impacting individuals or property, including but not limited to:

- (1) a fire alarm
- (2) intrusion detection
- (3) video security
- (4) an access control system or device
- (5) a medical alert

Many states that have adopted right to repair legislation have recognized these risks and included similar exemptions to protect public safety.

ESA and its members are committed to protecting consumers and communities. We believe HB 162 can achieve its goals while preserving the integrity and reliability of systems that Alaskans depend on every day. We appreciate your consideration and are available as a resource to the Committee.

Respectfully submitted,

Taylor Criddle
Vice President of Advocacy & Public Affairs
Electronic Security Association
Taylor.Criddle@esaweb.org
(530) 615-1072



HB 162 Statement of Opposition

The Papé Group, Inc., based in Eugene, Oregon, operates a full offering of capital equipment dealerships in the western United States. Papé Machinery, Papé Kenworth, Papé Material Handling, Ditch Witch West, and Engineered Products, represent manufacturers including John Deere, Kenworth, Hyster/Yale, Ditch Witch and many allied manufacturers in support of the construction, agriculture, forestry, trucking, and warehousing/material handling industries.

Papé supports our Alaskan customers through our Ditch Witch utility equipment, Hyster/Yale forklift, and Kenworth truck dealerships in Anchorage and Fairbanks.

The proposed legislation has far-reaching unintended consequences for customer service, safety and environmental impact when applied to utility, construction, agriculture, warehousing, and aerial reach equipment.

Dealers, by definition, are wholesalers. The dealer business model serves the fulfillment needs of large multi-national manufacturers within defined territories. As such, these manufacturers enforce high standards relating to carrying their parts and whole goods, training, and customer support. It is unreasonable to legislate that manufacturers provide the same wholesale pricing to independent repair providers and customers that do not have the same obligations as the manufacturers' dealer network. Every business needs to pay their bills and mandating that parts be sold directly at wholesale prices would cause irreparable financial damage to the dealer network and to Alaskans that rely on this support.

As a dealer, we support our customers' ability to repair their own equipment. Alongside our

manufacturers, we currently provide manuals, tools, diagnostic equipment, software updates, specialized training and technical assistance to our customers. Nevertheless, we are concerned that allowing third parties to modify the digital operating parameters could lead to unsafe operating conditions or violations under the Clean Air Act.

The manufacturers we support use digital electronics to ensure that their machinery safely operates within engineering specifications. They need to ensure these safe operating ranges. Giving unfettered access could subject operators and bystanders to hazardous operating conditions and unsafe worksites. Imagine an untrained technician resetting the load parameters of a forklift that is expected to safely load and unload racking at heights of over 30 feet. Misunderstanding these parameters could have fatal consequences.

The ability to meet required environmental standards is also designed into the digital electronic equipment that interfaces between the operator and the engine. Allowing anyone, other than approved manufacturer representatives, to make changes (or reset fault codes) within the underlying software would allow third parties to defeat the very technologies required to comply with Federal and State environmental laws.

We believe firmly that HB 162 should extend the exclusion, already provided for motor vehicles, to also exclude off-road vehicles and equipment such as warehousing, utility, farm equipment, construction equipment, other off-road equipment and trucks, and stationary engines.

Jordan Papé
President and CEO
The Papé Group, Inc.



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

Mach 16, 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 Merrick, Vice Chair Dunbar, and Members of the Senate 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,

A handwritten signature in black ink, appearing to read 'Katie Reilly', with a long horizontal stroke extending to the right.

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

Outdoor Power Equipment Institute

March 16, 2026

transmitted via e-mail: house.community.and.regional.affairs@akleg.gov

The Honorable Rebecca Himschoot
Co-Chairperson, House Community and Regional Affairs Committee
State Capitol
Juneau, AK 99801

The Honorable Donna Mears
Co-Chairperson, House Community and Regional Affairs Committee
State Capitol
Juneau, AK 99801

re: OPEI opposition to HB 162, An Act relating to the diagnosis, maintenance, and repair of products that use digital electronics to operate; adding an unlawful act to the Alaska Unfair Trade Practices and Consumer Protection Act; and providing for an effective date.

Dear Co-Chairs Himschoot and Mears:

I write on behalf of our member companies to express our opposition to HB 162 as it is the wrong approach for outdoor power equipment and creates the potential for harm to Alaska's consumers and businesses alike. OPEI is also a member of the Coalition Against Illegal Tampering which represents the broader off-road equipment sector and their shared concerns about the unsafe and in some cases illegal modification and tampering with equipment.

OPEI is an international trade association representing the manufacturers and their suppliers of non-road gasoline powered engines, personal transport & utility vehicles, golf cars and consumer and commercial outdoor power equipment ("OPE"). OPE includes lawnmowers, garden tractors, trimmers, edgers, chain saws, snow throwers, tillers, leaf blowers and other related products. OPEI member companies and their suppliers contribute approximately \$16 billion to US GDP each year. OPEI members currently distribute their products across all 50 states, through a diversity of retail outlets including independent dealers who are authorized to sell and service their equipment through a contractual arrangement.

Attached is detailed information on the OPE industry, its products, and the concerns underlying our opposition to this legislation. In summary, HB 162 creates risks of OPE modification outside the scope of recommendations for repair made by the manufacturer. Such modifications risk impairment of product safety controls creating the potential for unsafe products and impairment of product emission controls creating the potential for environmental harm and violation of federal laws.

As much as any U.S. state, Alaskan consumers and businesses rely on the dependability and performance of member products for utility uses, providing for their personal safety and livelihoods. These products include utility off-road vehicles, snowmobiles, generators, snow throwers, and chainsaws. The reliance on these products in the face of extreme weather conditions is predicated on the appropriate maintenance



and repair of the products as recommended by the manufacturer. HB 162 instead only creates an increased risk of unsafe product modification, whether intentional or not, rather than a “right to repair”.

As a general matter this broad legislation fails to consider the diversity of our industry’s products and their repair needs, including our members’ effective record of providing for product repair. This includes our industry’s 2023 commitment to offer additional repair resources, in cases where the product and application may require it.

Thank you for the consideration of these comments, and I would be happy to address any questions you might have.

Best regards,

A handwritten signature in black ink that reads "Daniel J. Mustico". The signature is written in a cursive, slightly slanted style.

Daniel J. Mustico
Senior Vice President, Government & Market Affairs
dmustico@opei.org

attachment

Outdoor Power Equipment Institute

WHY Outdoor Power Equipment (OPE) Manufacturers OPPOSE “Right to Repair” Legislation

Current legislation is overly broad with unintended consequences for consumers of outdoor power equipment (“OPE”). The OPE industry is instead committed to the consumer’s right to repair where it does not risk modifications to products which compromise consumer safety, product performance, and environmental protection.

- Modification is not repair. Modifications are outside the scope of recommendations for repair made by the manufacturer.
- Providing access to embedded software may result in modifications, not repair.

WHO WE ARE, AND IMPORTANT UNIQUE ASPECTS OF THE OPE INDUSTRY

- \$16 billion U.S. industry
- 110 U.S. manufacturer members
- U.S. OPE industry employs 150,000 workers
- OPE includes: lawn mowers, snow throwers, chain saws, generators and more.
- OPE product use is ubiquitous in American households and businesses of all sizes, totaling approximately 250 million legacy products in use and new shipments of nearly 40 million products annually.
- OPE industry has a long history of consumer safety and environmental protection through the development of safety standards and engagement with government, including compliance with all regulations.

ABOUT OPE PRODUCTS

- Most OPE manufactured today relies on electronics and software code for various functions – including safety and environmental compliance.
- OPE product offerings are increasingly electrifying with lithium-ion battery technology – this results in the necessary use of software to control safety and operation of the machines.
- Depending on the type of power source of the OPE (e.g., gas, diesel, battery, AC), the proposed legislation can create very unique risks of product modification to products, whether intentional or not.
- Different from many of the other products impacted by this broad scope legislation, many types of OPE have significant service lives and markets for re-use, re-manufacture, and recycling.
- For OPE with shorter service lives, serviceability options are diverse and based on manufacturer consideration of price, service life, potential for consumer repair, and the complexity of the anticipated repairs.
- To effectively provide for these diverse repair needs, OPE is serviced (when applicable) through a diversity of channels including independent authorized dealers, independent service providers, and retailers.
- OPE manufacturers already provide tools necessary for the proper diagnosis, maintenance and repair of products, where safe and applicable.
- In cases where additional maintenance, diagnostic, and repair tools are still required or preferred for applicable products, effective 2023 manufacturers of residential and commercial lawn & garden equipment will offer such additional resources for purchase [for information see www.opei.org/right-repair-solutions/].

WHY “RIGHT TO REPAIR” LEGISLATION IS THE WRONG APPROACH, AND FAILS TO SERVE CONSUMERS AND HARMS MANUFACTURERS

- The legislation creates risks of improper repair and modification, whether intentional or not, which poses risks to consumer safety, product performance, and environmental protection.
- OPE maintenance, diagnostic, and repair needs cannot be equated with other equipment and products such as consumer electronics.
- Broad scope legislation is impractical for the OPE industry as products are significantly diverse according to price, service life, retail channel, potential for consumer repair and the complexity of anticipated repairs.



- For products with significant service life, improper/faulty repair and/or modification can shorten the service life and/or negatively impact the re-sale value of the product.
- Improper/faulty repair and/or modification can void the product’s warranty.
- In some cases, legislation may infringe upon OEM intellectual property protections provided for under U.S. Federal law. Examples of areas where preemptive federal law may apply are copyright¹, trade secrets², fraud and abuse³, and air emission regulations⁴.

WHY “RIGHT TO REPAIR” LEGISLATION RISKS IMPAIRMENT OF PRODUCT SAFETY CONTROLS AND CREATES POTENTIAL FOR UNSAFE PRODUCTS

- Improper modification of software or hardware risks making products non-compliant with applicable safety standards, and as such unsafe. For example:
 - Modification creates the potential to impair Operator Presence Controls (OPC) which protect against injury by disabling powered components when an operator is not actively controlling equipment.
 - The integrity of the OPC of consumer pedestrian-controlled lawnmowers is required under law by a federal standard (U.S. Consumer Product Safety Commission)⁵.
 - Modifications to other controls of OPE may impair control mechanisms for speed, direction, steering, and braking.
- These safety risks apply not only to the OPE user, but commercial workplace employees and bystanders including vulnerable pedestrians where products are used in public settings for both residential and commercial purposes.
- Modifications may also result in the potential to expose OPE users to unsafe engine emission levels of carbon monoxide due to improper emission control modification.
- Where applicable to OPE, lithium-ion batteries are not amenable to any form of repair. For more information on batteries and their chargers see www.opei.org/battery-basics/.

WHY “RIGHT TO REPAIR” LEGISLATION RISKS IMPAIRMENT OF PRODUCT EMISSION CONTROLS, ENVIRONMENTAL HARM AND VIOLATION OF FEDERAL LAWS

- Where applicable, OPE is subject and compliant to product air emission regulations, which is governed by the machine’s electronic / software controls. “Right to Repair” legislation risks potential product modifications which compromise air emissions and compliance with the law.
- “Right to Repair” legislation potentially inhibits federal (and state where applicable) jurisdiction over the regulation of engine emissions.
- The legislation further inhibits federal (and state where applicable) statutory anti-tampering provisions and may infringe upon protections of OEM intellectual property rights.
- Also where applicable (for battery-powered OPE), the legislation may inhibit federal (and state where applicable) jurisdiction over the regulation of battery and battery charger efficiency. For more information on batteries and their chargers see www.opei.org/battery-basics/.

Learn more at www.opei.org/right-repair-solutions/

#

¹ The Copyright Act and Digital Millennium Copyright Act (DMCA)

² Defend Trade Secrets Act (DTSA)

³ Computer Fraud and Abuse Act (CFAA)

⁴ Clean Air Act (CAA)

⁵ U.S. Code of Federal Regulations, Part 1205, Safety Standard for Walk-Behind Power Lawn Mowers



March 17, 2026

The Honorable Rebecca Himschoot and Donna Mears
Members, Alaska House Committee on Committee and Regional Affairs

Re: Electronics Manufacturers Opposition to HB 162

Chair Himschoot, Chair Mears, and Members of the Committee:

On behalf of the hundreds of manufacturers and businesses our coalition represents, we respectfully oppose HB 162. This legislation would mandate original equipment manufacturers (OEMs) of digital electronic equipment sold or used in Alaska to provide independent repair providers with diagnostic and repair information, software, tools, and parts – but without requiring any of the critical consumer protections afforded by authorized repair networks and their self-service repair offerings, such as training and competency certification, and putting at risk protections manufacturers have built in for consumer data privacy and security. Without any vetting process for qualified repair facilities, the potential for consumer harm is significant and undermines the innovations manufacturers have developed to protect customers. Additionally, we have concerns that this legislation would assist in establishing a “patchwork” of repair legislation in the states, thus creating a burdensome and contradictory compliance regime for members of our industry. Over the years, we have made a direct attempt to work with advocates on numerous occasions to develop a national memorandum of understanding, but our efforts have been repeatedly rebuffed. It appears their preference is to relitigate this issue on a state-by-state

basis, which will inevitably result in a costly, confusing, and onerous compliance patchwork.

Our organizations represent a broad spectrum of manufacturers of consumer electronics, security equipment, toys, lithium-ion batteries, and other connected electronic products, as well as companies that rely on the secure operation of these devices. All of these companies stand behind the quality of their products. Our members develop products and services for a wide range of commercial, government, and consumer users. Their customers depend on these products to operate safely, securely, and accurately, whether they are being used to support banking and commercial transactions, transmit and store sensitive personal data, support industrial operations, medical applications, or securely offer and deliver entertainment and other services. As businesses, government agencies, and consumers continue to increase their reliance on connected devices to help deliver efficiency, convenience, and services, it is important to remain vigilant and focused on mitigating the risks associated with the safe and secure operation of those products.

HB 162 mandates that OEMs treat any independent repair provider in much the same way as authorized network providers or those who use the self-repair offerings – but without any contractual protections, requirements, or restrictions. In **doing** so, the bill places consumers and their data at risk, undermines the business of **Alaska** companies **that are part of OEM-authorized networks**, and **stifles** innovation by putting hard-earned intellectual property in the hands of hundreds, if not thousands, of new entities. Further, the bill fails to account for the wide range of repair and refurbishment options currently available to Alaska consumers from both OEM-authorized and independent repair stores. It also does not **address** advancements in sustainability by electronic product manufacturers.

For these reasons, we urge the committee against moving forward with this legislation without addressing these identified issues.

HB 162 harms consumer security.

One of our chief concerns with this legislation is its potential to weaken the privacy and security features of various electronic products. The security of user information on these products is of the utmost importance to consumers that rely on them. Computers, tablets, and smartphones are at risk of hacking, and weakening of the privacy and security protections of those products will increase risks to consumers. With access to technical information, criminals can more easily circumvent security protections, harming not only the product owner but also everyone who shares their network. In an era of sophisticated cyberattacks, we should not make it easier for criminals to hack security provisions.

Forcing OEMs to provide unauthorized repair facilities with information on how to bypass consumers' safety locks presents unacceptable risks to consumers' data privacy. [A recent study](#) found that privacy violations already occur when consumers seek computer or phone repairs. Without the contractual safeguards created by authorized repair networks that allow OEMs to hold bad actors

accountable, HB 162 will create new opportunities for snooping repair technicians to access and copy consumers' personal data.

HB 162 harms consumer safety.

Manufacturers offer authorized repair networks to provide consumers with assurance that their products are serviced by properly trained and vetted repair professionals who have the necessary skills to repair electronic products safely and reliably.

Most consumer technology products are comprised of complex electronics which require specialized training and sophisticated test instruments to repair safely. Some types of repairs can be extremely detailed, complicated, and dangerous to anyone without proper training. It is particularly important that products containing high-energy lithium-ion batteries are repaired only by trained professionals who understand and mitigate the hazards associated with installing, removing or replacing these batteries. In January 2021, the U.S. Consumer Product Safety Commission released a [consumer safety warning](#) that rechargeable lithium-ion battery cells, when they are "loose" and not installed in a device or part of an integral battery, are "potentially hazardous to consumers when handled, transported, stored, charged, or used to power devices" and "can overheat and experience thermal runaway, igniting the cell's internal materials and forcibly expelling burning contents, resulting in fires, explosions, serious injuries and even death."

Manufacturers want to ensure that their products are serviced by professionals who understand the intricacies of their products and have spent time procuring the knowledge necessary to safely repair them and return them to consumers without compromising those standards or undermining the safety and security of their products. Authorized repair networks not only include training requirements but also have the technical skills and test instruments to verify that repair parts meet all necessary performance and safety specifications. Consumers can be protected by warranties or other means of recourse. The legislation provides no such protections for consumers, repair shops, or manufacturers.

When an electronic product breaks, consumers have a variety of professional repair options, including using an OEM's authorized repair network, which often include local repair service providers as well as mail-in and even in-house repair options for some categories of products. Consumers may also choose to use one of many independent repair providers; although they do so without the quality assurance provided by using a manufacturer's authorized network provider. The point is that the free-market economy provides a wide range of consumer choice for repair with varying levels of quality, price, and convenience without mandates imposed by the legislation.

Manufacturers' authorized networks of repair facilities guarantee that repairs meet OEM performance and safety standards. If an OEM's brand and warranty are to stand behind repair work and assume product liability, it is only reasonable that the repair facility demonstrates competency and reliability. Without the training and other quality assurance requirements of authorized

service providers, manufacturers would not be able to stand behind their work, warranties, technical support, ongoing training, and business support.

HB 162 mandates the disclosure of protected proprietary information. Manufacturers make significant investments in the development of products and services, and the protection of intellectual property is a legitimate and important aspect of sustaining the health of the vibrant and innovative technology industry. However, HB 162 puts at risk the intellectual property that manufacturers have developed.

Consumer electronics' on-board software (i.e., firmware) are key to the functioning and operation of the hardware it is embedded in, and firmware helps protect against unauthorized access to other software and applications. That software is subject to copyright under federal law, and Section 1201 of the Digital Millennium Copyright Act, a related federal law, ensures that bad actors cannot tamper with the digital rights management that copyright owners use to protect this software. The problem is that making repairs to hardware components may require the circumvention of digital rights management and leave the software in an unprotected state – harming the copyright owners of the software.

Firmware controls many other product functions, so opening it up for repair purposes exposes other more sensitive functions, such as security features, to potential tampering. Given the scope of products covered and what must be provided under the legislation – including diagnostics, tools, parts, and updates to software – it is highly likely some of the information would be proprietary. Providing unauthorized repair facilities and individuals with access to proprietary information without the contractual safeguards currently in place between OEMs and authorized service providers places OEMs, suppliers, distributors, and repair networks at risk.

HB 162 fails to account for advancements in sustainability by electronic product manufacturers.

The **bill** is partly based on an inaccurate assumption that **it** will aid in the reduction of electronic waste in the state of Alaska. According to a recent study by Yale and Rochester Institute of Technology researchers, e-waste generation in the U.S. peaked in 2015 and is in a period of extended decline (see [“Electronic Waste on the Decline, New Study Finds”](#)). This trend is corroborated by recent data from the U.S. Environmental Protection Agency whose [data](#) shows consumer electronics as the fastest declining part of the municipal solid waste stream.

Electronic product manufacturers have developed robust policies and programs to ensure that they are continuously improving the sustainability of their products for their whole lifecycle, from design to material sourcing, product performance, reuse, and responsible end of life management.

This has led to continued innovation and the use of new technologies which provide consumers improved devices while simultaneously reducing the overall amount of e-waste generated – all under the existing product repair

environment. Plus, with new technologies like OLED and additional lightweighting across the electronics industry, additional declines in e-waste generation are expected to continue during the coming decades.

Repair and reuse are important elements of electronics manufacturers sustainability efforts. Not only is repair and reuse in the OEM's best interest so that consumers can continue to enjoy their products, but many OEMs are returning still-useful electronic products to active service to get the maximum benefits out of the resources used to make them.

Additionally, under revised "green" procurement standards, federal agencies and other purchasers will be required to purchase computers that meet certain environmental performance criteria under the Electronic Product Environmental Assessment Tool (EPEAT) rating system. These existing policies and programs promote repair and reuse without the consumer safety, security or business being compromised.

Conclusion

Thank you for considering our perspective on this complicated issue. Our members **bear** a significant responsibility to the businesses, governments, and individual consumers **that depend** on us to protect the safety and security of their electronic products, as well as the sensitive data that they contain. We are committed to working with you to promote digital privacy and security, while resisting unwarranted intervention in the marketplace with one-size-fits-all mandates that compromise consumer safety and protection. Many of the members of our coalition **have** already taken measures to ensure consumers have numerous options for repairing their devices and appliances. The industry is **evolving** in a positive manner. For those reasons, we oppose HB 162.

Sincerely,

Repair Done Right Coalition

LET US FIX OUR STUFF

Dear Lawmaker,

When companies monopolize electronics repair, it costs consumers and creates e-waste.

We should give every consumer and every small business access to the parts, tools, and service information they need to repair products by passing Right to Repair legislation.

The Alaska Capitol
120 4th ST,
Juneau, AK 99801

First and Last Name

Zip Code

Adam Judy 99501

mail Address



By providing my contact information, I consent to have Alaska Environment and the other groups in The Public Interest Network contact me with information about this and future campaigns.

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The Alaska Capitol
120 4th ST,
Juneau, AK 99801

First and Last Name

Zip Code

Rediga Otha 99501

Rediga Otha 53@gmail.com
mail Address



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The Alaska Capitol
120 4th ST,
Juneau, AK 99801

First and Last Name

Zip Code

Maria Shampford 99504

Email Address



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The Alaska Capitol
120 4th ST,
Juneau, AK 99801

First and Last Name

Zip Code

Mariel Tan 99501

Mariel Tan 106 Orca St. Anchorage Alaska
Email Address



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The Alaska Capitol
120 4th ST,
Juneau, AK 99801

First and Last Name

Zip Code

AMIE GARY 99803

Email Address

amiegary@gmail.com

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The Alaska Capitol
120 4th ST,
Juneau, AK 99801

First and Last Name

Zip Code

Carol Davis 99501

Email Address

Carol Davis 99501@gmail.com



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The Alaska Capitol
120 4th ST,
Juneau, AK 99801

First and Last Name

Zip Code

Mallory P. Rimm 99603

Email Address

mprimm@gmail.com

By providing my contact information, I consent to have Alaska Environment and the other groups in The Public Interest Network contact me with information about this and future campaigns.



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When companies monopolize electronics repair, it costs consumers and creates e-waste. We should give every consumer and every small business access to the parts, tools, and service information they need to repair products by passing Right to Repair legislation.

The Alaska Capitol
120 4th ST,
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First and Last Name

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Michael Brown 99556

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By providing my contact information, I consent to have Alaska Environment and the other groups in The Public Interest Network contact me with information about this and future campaigns.

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Let Us Fix Our Stuff

Dear Lawmaker,

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The Alaska Capitol
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The Alaska Capitol
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First and Last Name Joan Frankovich Zip Code 99517



Email Address! fireweed59@pci.net
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Let Us Fix Our Stuff

Dear Lawmaker,

When companies monopolize electronics repair, it costs consumers and creates e-waste. We should give every consumer and every small business access to the parts, tools, and service information they need to repair products by passing Right to Repair legislation.

The Alaska Capitol
120 4th ST,
Juneau, AK 99801

Dale Gardner 99517
First and Last Name Zip Code

dalegardner@gmail.com
Email Address



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120 4th ST,
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MARLENE 99603
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Email Address



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Antonio Zakharova 99517

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tozean9@gmail.com
mail Address!



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mail Address!



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Barbara Lonsdale 99517

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barblonsdale@gmail.com
Email Address!



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120 4th ST,
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Wax Evans-Reacock 99502

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Wax Evans-Reacock
Email Address



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Ruby Belens 99517

First and Last Name Zip Code

Ruby Belens
Email Address



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Rayn Eagle 99501

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Rayn Eagle
Email Address



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Jenava Phillips 99501

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Angela Walker 99504

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First and Last Name Julie Strongpork Zip Code 99507

Email Address Strongpork01@gmail.com

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The Alaska Capitol
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First and Last Name Shivani Shank Zip Code 99508

Email Address 2432 Anchorage Alaska

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The Alaska Capitol
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First and Last Name Minda Albiston Zip Code 99653

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The Alaska Capitol
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First and Last Name Molly Dietrich Zip Code 99808

Email Address Mollyd34@gmail.com



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First and Last Name Jeanne Glaves Zip Code 99508

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The Alaska Capitol
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Susan Pacillo 99515

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The Alaska Capitol
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First and Last Name | Linden Swain | Zip Code | 99503

mail Address | coldice23@gmail.com



By providing my contact information, I consent to have Alaska Environment and the other groups in The Public Interest Network contact me with information about this and future campaigns.

Let Us Fix Our Stuff

Dear Lawmaker,

When companies monopolize electronics repair, it costs consumers and creates e-waste. We should give every consumer and every small business access to the parts, tools, and service information they need to repair products by passing Right to Repair legislation.

The Alaska Capitol
120 4th ST,
Juneau, AK 99801

First and Last Name | Tavis Merel | Zip Code | 99605

mail Address | TJ Merel 2007 @swain



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120 4th ST,
Juneau, AK 99801

First and Last Name | Kelly Dixon | Zip Code | 99737

mail Address | kellydixon@yahoo.com



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120 4th ST,
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First and Last Name | Cathleen Wetherhoff | Zip Code | 99504

mail Address | go.wollen.kwpf00@icloud.com



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Deborah Kimecher 99603

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mail Address



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The Alaska Capitol
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Rebecca McCullough 99502

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mail Address



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Email Address



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aklap8@gmail.com

Email Address



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Ann Marie Langjuor 99517

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alanguier@gmail.com
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Kira Bird 99517

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Email Address



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The Alaska Capitol
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The Alaska Capitol
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Nathalie Normy 99604

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nathalienormy@gmail.com
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The Alaska Capitol
120 4th ST,
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First and Last Name Taylor Levinson
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Email Address taylorlevinson@gmail.com



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The Alaska Capitol
120 4th ST,
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First and Last Name Jessica Case
Zip Code 991676
Email Address jscase@hotmail.com



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The Alaska Capitol
120 4th ST,
Juneau, AK 99801

First and Last Name Lena Haney
Zip Code 99517
Email Address lenahaney@icloud.com



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The Alaska Capitol
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The Alaska Capitol
120 4th ST,
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The Alaska Capitol
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The Alaska Capitol
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First and Last Name MARLYN MELVILLE Zip Code 99577
Email Address MELVILLE@KENA PENINSULA SUPPLIES INC



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The Alaska Capitol
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The Alaska Capitol
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The Alaska Capitol
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First and Last Name Skye Sunderhaft Zip Code 99517

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The Alaska Capitol
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The Alaska Capitol
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**The Alaska Capitol
120 4th ST,
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First and Last Name

Zip Code

Tracy Derris 99815

mail Address

Tracy Derris@gmail.com

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**The Alaska Capitol
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First and Last Name

Zip Code

Heidi Spencer 99603

Email Address

Heidi Spencer907@gmail.com

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**The Alaska Capitol
120 4th ST,
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First and Last Name

Zip Code

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robrieta257@gmail.com

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The Alaska Capitol
120 4th ST,
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BUCK MANLEY 99502
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Mr.bmanley@gmail.com
Email Address



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The Alaska Capitol
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COLY PESLEY 99517
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The Alaska Capitol
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First and Last Name Cheryl Devenny Zip Code 99564

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The Alaska Capitol
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First and Last Name Chas Kasmuth Zip Code 99616

Email Address CHASKASMUTH@GMAIL.COM



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Let Us Fix Our Stuff

Dear Lawmaker,

When companies monopolize electronics repair, it costs consumers and creates e-waste. We should give every consumer and every small business access to the parts, tools, and service information they need to repair products by passing Right to Repair legislation.

The Alaska Capitol
120 4th ST,
Juneau, AK 99801

First and Last Name M W Miller Zip Code 99507

Email Address MWILLER@GMAIL.COM



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**The Alaska Capitol
120 4th ST,
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Michael Quinlan 91602
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Email Address

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Paul Seaton 99603
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Email Address

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Email Address

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Email Address

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Email Address

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Let Us Fix Our Stuff

Dear Lawmaker,

When companies monopolize electronics repair, it costs consumers and creates e-waste. We should give every consumer and every small business access to the parts, tools, and service information they need to repair products by passing Right to Repair legislation.

The Alaska Capitol
120 4th ST,
Juneau, AK 99801

Laura Zamborsky 99507
First and Last Name Zip Code
Zamborsky26@hotmail.com
Email Address



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The Alaska Capitol
120 4th ST,
Juneau, AK 99801

Tyler Koning 99517
First and Last Name Zip Code
TylerKoning@gmail.com
Email Address



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The Alaska Capitol
120 4th ST,
Juneau, AK 99801

First and Last Name Kristy Deacon Zip Code 99504

Email Address kdeacon@alaska.edu



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The Alaska Capitol
120 4th ST,
Juneau, AK 99801

First and Last Name FAITH CAMPBELL Zip Code 99203

Email Address mcfaithy@gmail.com



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The Alaska Capitol
120 4th ST,
Juneau, AK 99801

First and Last Name SAL CORREZ Zip Code 97203

Email Address SALVADER@JUNO.COM



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The Alaska Capitol
120 4th ST,
Juneau, AK 99801

First and Last Name Gailyn Taylor Zip Code 99517

Email Address gailynnt@gmail.com



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The Alaska Capitol
120 4th ST,
Juneau, AK 99801

Shanon Cathers 99540

First and Last Name Zip Code

mealahymae@gmail.com
mail Address



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The Alaska Capitol
120 4th ST,
Juneau, AK 99801

Emily Cohen 99501

First and Last Name Zip Code

emilymirandacohen@gmail.com
mail Address



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The Alaska Capitol
120 4th ST,
Juneau, AK 99801

Teal P. Carlson 99867

First and Last Name Zip Code

teal.p.carlson@gmail.com
Email Address



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The Alaska Capitol
120 4th ST,
Juneau, AK 99801

Jennifer Carlson 99867

First and Last Name Zip Code

jcarlson@alaskaenvironment.org
Email Address



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The Alaska Capitol
120 4th ST,
Juneau, AK 99801

First and Last Name KILEY HETH Zip Code 99801

mail Address |



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The Alaska Capitol
120 4th ST,
Juneau, AK 99801

First and Last Name John Mario Zip Code 99567

mail Address | W/A



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The Alaska Capitol
120 4th ST,
Juneau, AK 99801

First and Last Name STEPHEN NICH Zip Code 99515

Email Address |

DNICH@DENALI@GMAIL.COM



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The Alaska Capitol
120 4th ST,
Juneau, AK 99801

First and Last Name MIKE BERZON Zip Code 35958

Email Address |



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The Alaska Capitol
120 4th ST,
Juneau, AK 99801

First and Last Name Jessica Ambidge.

Zip Code 99639

Email Address



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When companies monopolize electronics repair, it costs consumers and creates e-waste. We should give every consumer and every small business access to the parts, tools, and service information they need to repair products by passing Right to Repair legislation.

The Alaska Capitol
120 4th ST,
Juneau, AK 99801

First and Last Name Tom Ambidge

Zip Code 99639

Email Address



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The Alaska Capitol
120 4th ST,
Juneau, AK 99801

First and Last Name Seanie Hawkins

Zip Code 99669

Email Address



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The Alaska Capitol
120 4th ST,
Juneau, AK 99801

First and Last Name MICHAEL EVERETT

Zip Code 99654

Email Address



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The Alaska Capitol
120 4th ST,
Juneau, AK 99801

First and Last Name Kristin May Zip Code 99603
mail Address [Signature]

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The Alaska Capitol
120 4th ST,
Juneau, AK 99801

First and Last Name JJM Johnson Zip Code 11757
mail Address JJM Johnson, GM

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The Alaska Capitol
120 4th ST,
Juneau, AK 99801

First and Last Name Maggie Bellows Zip Code 37411
Email Address MaggieBellows@gmail.com

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The Alaska Capitol
120 4th ST,
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First and Last Name Miranda Siemens Zip Code 80513
Email Address MirandaSiemens@gmail.com

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The Alaska Capitol
120 4th ST,
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First and Last Name David Pyne Zip Code 89128

907 830 3269

Email Address |

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The Alaska Capitol
120 4th ST,
Juneau, AK 99801

First and Last Name Mike Sproule Zip Code 32708

Email Address | Mike Sproule 333@yahoo.com



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The Alaska Capitol
120 4th ST,
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First and Last Name Sarah McCabe Zip Code 99516

Email Address |

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The Alaska Capitol
120 4th ST,
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First and Last Name Sue Smith Zip Code 99516

Email Address |



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The Alaska Capitol
120 4th ST,
Juneau, AK 99801

Kevin Green

parts

First and Last Name

Zip Code

Email Address

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The Alaska Capitol
120 4th ST,
Juneau, AK 99801

Ronald Perry

99597

First and Last Name

Zip Code

Email Address

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The Alaska Capitol
120 4th ST,
Juneau, AK 99801

Katie Montmill

11714

First and Last Name

Zip Code

Email Address

kathmontmi@gmail.com

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The Alaska Capitol
120 4th ST,
Juneau, AK 99801

WTT BADOATO

32903

First and Last Name

Zip Code

Email Address

triplehelix@gmail.com

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The Alaska Capitol
120 4th ST,
Juneau, AK 99801

First and Last Name

Zip Code

Leah Diese 826036

mail Address

leahdiese@yahoo.com



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The Alaska Capitol
120 4th ST,
Juneau, AK 99801

First and Last Name

Zip Code

Earl Swenson 99603

mail Address

earlswenson@alaska.gov



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120 4th ST,
Juneau, AK 99801

First and Last Name

Zip Code

Sean Hebbib

Email Address

seanhebbib@alaska.gov



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The Alaska Capitol
120 4th ST,
Juneau, AK 99801

First and Last Name

Zip Code

Tom Klymchuk 441108

Email Address

tomklymchuk@alaska.gov



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**The Alaska Capitol
120 4th ST,
Juneau, AK 99801**

First and Last Name Allyssa Bergant Zip Code 99603

mail Address | _____

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**The Alaska Capitol
120 4th ST,
Juneau, AK 99801**

First and Last Name Kristen Torsaa Zip Code 99603

mail Address | _____



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A local non-profit that encourages and enables our community to reduce waste and increase recycling.

Board of Directors

April 7th, 2025

RE: HB 162 - Digital Product Repair

Green Star of Interior Alaska hereby presents this letter of support of HB 162 - Digital Product Repair.

President
Mike Hull
Assistant Professor
of Physics,
UAF

Vice President
Natalie Mayer, MD
Family Medicine

Treasurer
Dennis L. Michel II
President
Omni Logistics, Inc.

Secretary
Linda Unsicker
Educator, Retired

Director
Buddy Lane
Environmental,
Health & Safety Mgr.
Golden Heart Waste
Management

Since the mid 1990's Green Star of Interior Alaska has been focused on reducing waste and increasing recycling in FNSB and Interior Alaska communities. Our evolution from "weekend warriors" in parking lots collecting electronics to keep them out of our landfill, to our current roles as the holder of the FNSB Electronics Recycling contract, operators of the FNSB Central Recycling Facility and Regional Coordinator of the Backhaul Alaska rural backhaul program has put us in direct contact with the ever increasing flow of e-waste generated by our communities.

When we receive electronics for recycling our first order of business is to triage the devices to see what components can be repurposed or reused. We make low-cost refurbished, tested and guaranteed devices available in Alaska. We even have an ultra-low-cost (and sometimes free) option available for low income Alaskans and non-profits through our Reboot IT Technology Grants program.

Unfortunately, our ability to repurpose many of these devices is prevented. In fact, we currently have no way to reliably and safely offer reconditioned phones or tablets due to the very issues HB 162 seeks to resolve. Desktops and laptops which might otherwise be reused also sometimes suffer the same fate - all due to walled-garden systems, inaccessibility of tools or parts, or lack of access to detailed documentation.

It is for these and many more reasons, about which we could comment for hours, that we urge you to join over 20 other states and dozens of other countries in requiring manufacturers to allow Alaskans the right to repair. Access to documentation, tools, parts and authorizations necessary to keep their devices in service is something which all Alaskans should expect when making these purchases.

We have learned the hard way that, while it may be easier to get electronics into Alaska these days, it is certainly no easier to get them out. And we know that all end-of-life electronics which are responsibly recycled must leave the state. Otherwise, they end up in our landfills, incinerators or abandoned on our lands.

Please - vote IN FAVOR OF HB 162.

Sincerely,

Joe Torma - General Manager - Green Star of Interior Alaska - gm@iagreenstar.org



Alaska Legislature
Alaska State Capitol
120 4th Street
Juneau, Alaska 99801-1182

Re: Comments in support of the Digital Product Repair Bill, HB 162 and SB 111.

January 26th, 2026.

Dear Alaska Legislators,

Each of the following residents of Alaska signed the following letter in support of passing Right to Repair legislation in the state of Alaska.

Dear Legislator,

When companies monopolize electronics repair, it costs consumers and creates e-waste. We should give every consumer and every small business access to the parts, tools, and service information they need to repair products by passing Right to Repair legislation.

Thank you,

Local repair options are vital to protecting Alaska and Alaskans from the toxic components of e-waste and to ensuring local resiliency and self-sufficiency. Repair tools and parts should not be under a monopoly.

Sincerely,

A handwritten signature in black ink that reads "Dyani Chapman". The signature is written in a cursive, flowing style.

Dyani Chapman
State Director
Alaska Environment

First Name	Last Name	CITY	STATE	ZIP
Elizabeth	Miner	Anchorage	AK	90508
David	Freeman	Anchorage	AK	99501
Mark	Stearns	Anchorage	AK	99501
James	Diehl	Anchorage	AK	99501
John	Randall	Anchorage	AK	99501
Steve	Fleischman	Anchorage	AK	99501
Peggy	Ede	Anchorage	AK	99501
Richard	Mcmahon	Anchorage	AK	99501
Gordan	Harper	Anchorage	AK	99501
Debbie	Golden	Anchorage	AK	99501
Eleanor	Mcmahon	Anchorage	AK	99501
Cynthia	Berger	Anchorage	AK	99501
Patty	Mcloughlin	Anchorage	AK	99501
Anita	Gibbs	Anchorage	AK	99501
Karola	Moore	Anchorage	AK	99501
Becky	Crandall	Anchorage	AK	99501
Christine	Gilmore	Anchorage	AK	99501
Ian	Buvit	Anchorage	AK	99501
Rebekah	Cochran	Anchorage	AK	99501
Valerie	Brown	Anchorage	AK	99501
Megan	Deming	Anchorage	AK	99501
Zan	Frederick	Anchorage	AK	99501
Charles	Tice	Anch99501	AK	99501
Benjamin	Wilkins	Anchorage	AK	99501
Maya	Dunham	Anchorage	AK	99501
Patricia	Ogorman	Anchorage	AK	99501
Mary	Ashton	Anchorage	AK	99501
John	Degeor	Anchorage	AK	99501
Hayley	Patin	Anchorage	AK	99501
Likka	McCauley	Anchorage	AK	99501
Roland	Gordon	Anchorage	AK	99501
Adrinana	Muir	Anchorage	AK	99501

Conor	Hickey	Anchorage	AK	99501
Robert	Ellis	Anchorage	AK	99501
Moira	Van Alstine	Anchorage	AK	99501
Paul	Decker	Anchorage	AK	99501
David	Kanaras	Anchorage	AK	99501
Sheena	Sanchez	Anchorage	AK	99501
David	Kanaris	Anchorage	AK	99501
Susan	Elliott	Anchorage	AK	99501
Thomas	Kinworthy	Anchorage	AK	99501
Amy	Shimek	Anchorage	AK	99501
Eric	Ackerman	Anchorage	AK	99501
Esme	Brudie janigo	Anchorage	AK	99501
Karen	Schoellhorn	Anchorage	AK	99501
Susan	Mcglain	Anchorage	AK	99501
Matthew	Mccauley	Anchorage	AK	99501
Herbert	Ray	Anchorage	AK	99501
Mitchell	Cullom	Anchorage	AK	99501
Alison	Smith	Anchorage	AK	99501
Kerry	Wilkins	Anchorage	AK	99501
Ellen	Robertson	Anchorage	AK	99501
Daniel	Klinkner	Anchorage	AK	99501
Madeline	Hutton	Anchorage	AK	99501
Lawrence	Ostrovsky	Anchorage	AK	99501
Bennett	Pearce	Anchorage	AK	99501
Jonathan	Halpern	Anchorage	AK	99501
Quinn	Slotnick murchison	Anchorage	AK	99501
Quinn	Slotnick	Anchorage	AK	99501
Marisol	Bundtze	Anchorage	AK	99501
Robert	Musgrave	Anchorage	AK	99501
Robert	Allen	Anchorage	AK	99501
James	Wilcox	Anchorage	AK	99501
Erica	French	Anchorage	AK	99501
Dakota	Chastain	Anchorage	AK	99501

John	Holtan	Anchorage	AK	99501
William	Dewey	Anchorage	AK	99501
Alexander	Wood Thomas	Anchorage	AK	99501
Andrew	Cutting	Anchorage	AK	99501
Brenna	Thiele	Anchorage	AK	99501
Jierum	Duarte	Anchorage	AK	99501
Jacob	Gray	Anchorage	AK	99501
Rebecca	Lyon	Anchorage	AK	99501
Dianna	Ligus	Anchorage	AK	99501
Kevin	Postma	Anchorage	AK	99501
Gailon	Ebell	Anchorage	AK	99501
Maya	Curtis	Anchorage	AK	99501
Jennifer	Orcutt	Anchorage	AK	99501
Mitchell	Laird	Anchorage	AK	99501
James	Liebsack	Anchorage	AK	99501
John	Ketchum	Anchorage	AK	99501
Kel	Thompson	Anchorage	AK	99501
Wendy	Isbell	Anchorage	AK	99501
Sandra	Volmer	Anchorage	AK	99501
Rice	Davidge	Anchorage	AK	99501
Dokota	Chastin	Anchorage	AK	99501
Ellie	Cutting	Anchorage	AK	99501
Jessica	Bury	Anchorage	AK	99501
Kyle	Coltrinari	Anchorage	AK	99501
Phyllis	Ploudre	Anchorage	AK	99501
Dana	Baruden	Anchorage	AK	99501
Shawn	Smith	Anchorage	AK	99501
Meg	Halsey	Anchorage	AK	99501
Debra	Reed	Anchorage	AK	99501
Patrick	Veith	Anchorage	AK	99501
Sarah	Saaroos	Anchorage	AK	99501
Veronica	Slajer	Anchorage	AK	99501
Melissa	Janigo	Anchorage	AK	99501

Sarah	Kleedeahn	Anchorage	AK	99501
Dylan	Jordan	Anchorage	AK	99502
Christopher	Mierzejek	Anchorage	AK	99502
Sadie	Johnson	Anchorage	AK	99502
Brenna	Flannery	Anchorage	AK	99502
Kaytie	Ridle	Anchorage	AK	99502
Rodney	Mojica	Anchorage	AK	99502
Sophia	Randazzo	Anchorage	AK	99502
Josh	Giauque	Anchorage	AK	99502
Jaime	Locke	Anchorage	AK	99502
Adam	Hayward	Anchorage	AK	99502
Hanna	Heffern	Anchorage	AK	99502
Steven	Rychetnik	Anchorage	AK	99502
Jonathon	Meister	Anchorage	AK	99502
Lindsey	Schnell	Anchorage	AK	99502
Mike	Morgan	Anchorage	AK	99502
Sophia	Randazzo	Anchorage	AK	99502
Justin	Maxwell	Anchorage	AK	99502
Stephen	Broyles	Anchorage	AK	99502
Brandon	Locke	Anchorage	AK	99502
Shaun	Poirot	Anchorage	AK	99502
Mehdi	Quazilbash	Anchorage	AK	99502
Joseph	Milton	Anchorage	AK	99502
Laura	Lampasone	Anchorage	AK	99502
Jeremiah	Hooper	Anchorage	AK	99502
Logan	Wolcott	Anchorage	AK	99502
Gwyneth	Geiger	Anchorage	AK	99502
Michael	Oradei	Anchorage	AK	99502
Dana	Wilson	Anchorage	AK	99502
James	Caldwell	Anchorage	AK	99502
Bryar	Podbielski	Anchorage	AK	99502
Matthew	Kelly	Anchorage	AK	99502
Brian	Hilmes	Anchorage	AK	99502

Ian	Fulp	Anchorage	AK	99502
Nicholas	Constantino	Anchorage	AK	99502
Maxwell	Sanchez	Anchorage	AK	99502
Daniel	Neetz	Anchorage	AK	99502
Dan	Netz	Anchorage	AK	99502
Lisa	Arnold	Anchorage	AK	99502
Heidi	Little	Anchorage	AK	99502
Wayne	Curley	Anchorage	AK	99502
Aj	Sanchez	Anchorage	AK	99502
Matt	Shasby	Anchorage	AK	99502
Vonda	McWilliams	Anchorage	AK	99502
Orrin	Weiss	Anchorage	AK	99502
Eric	Weaver	Anchorage	AK	99502
Rene	Sorenson	Anchorage	AK	99502
Heidi	Hurd	Anchorage	AK	99502
Melody	Burgos	Anchorage	AK	99502
Kelsea	Hewitt	Anchorage	AK	99502
Andrea	Medeiros	Anchorage	AK	99502
Michael	Arnold	Anchorage	AK	99502
Kristina	Bybee	Anchorage	AK	99502
Mike	Click	Anchorage	AK	99502
Misty	Shasby	Anchorage	AK	99502
Spirit	Angasan	Anchorage	AK	99502
Joseph	Milton	Anchorage	AK	99502
Mark	Burgos	Anchorage	AK	99502
Breanne	Weiss	Anchorage	AK	99502
Matthew	Walker	Anchorage	AK	99502
Desi	Ramirez	Anchorage	AK	99502
David	Gamez	Anchorage	AK	99502
Isaac	Turner	Anchorage	AK	99502
Michael	Morgan	Anchorage	AK	99502
Bonilla	Peterson	Anchorage	AK	99502
Amy	Washington	Anchorage	AK	99502

Boyd	Smallwood	Anchorage	AK	99502
Breana	Lauterbach	Anchorage	AK	99502
Keith	Wieldwhold	Anchorage	AK	99502
Kenan	Sabado	Anchorage	AK	99502
Ben	Springer	Anchorage	AK	99502
Jan	Evans	Anchorage	AK	99502
Jamie	Meister	Anchorage	AK	99502
Kriss	Wright-Poirier	Anchorage	AK	99502
Maura	Broyles	Anchorage	AK	99502
James	March	Anchorage	AK	99502
Benjamin	Johnson	Anchorage	AK	99502
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James	Williams	Anchorage	AK	99502
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Eric	Kroh	Anchorage	AK	99502
Bruce	Booth	Anchorage	AK	99502
Tina	Constantino	Anchorage	AK	99502
Ian	Fulp	Anchorage	AK	99502
Ricky	Maxwell	Anchorage	AK	99502
Holly	Nunn	Anchorage	AK	99502
Robert	Macnaughton	Anchorage	AK	99502
Kyla	Milne	Anchorage	AK	99502
Dyani	Chapman	Anchorage	AK	99502
Mark	Romick	Anchorage	AK	99503
Charles	Holness	Anchorage	AK	99504
Thomas	Scott	Anchorage	AK	99504
Caleb	Brown	Anchorage	AK	99504
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Benjamin	Knighten	Anchorage	AK	99507
Richard	Johannes	Anchorage	AK	99507
Carl	Siebe	Anchorage	AK	99507
Kimberly	Bailey	Anchorage	AK	99507
Michael	Anderson	Anchorage	AK	99507

Clemencia	Merrill	Anchorage	AK	99507
John	Dixon	Anchorage	AK	99507
Ryan	Leindecker	Anchorage	AK	99507
Elliott	Hughes	Anchorage	AK	99507
Chris	Tomsen	Anchorage	AK	99507
Michael	Roy	Anchorage	AK	99507
Lori	Kurka	Anchorage	AK	99507
Hubert	Vinberg	Anchorage	AK	99507
Dawn	Welton	Anchorage	AK	99507
Danielle	Holness	Anchorage	AK	99507
James	Lindh	Anchorage	AK	99507
Koren	Stantorf	Anchorage	AK	99507
Eric	Thomson	Anchorage	AK	99507
Justin	Stantorf	Anchorage	AK	99507
Sandra	Potvin	Anchorage	AK	99507
Tessa	Linedecker	Anchorage	AK	99507
John	Koltun	Anchorage	AK	99507
Emil	Wunderle	Anchorage	AK	99507
Todd	Main	Anchorage	AK	99507
Meagan	Mccall	Anchorage	AK	99507
Tracy	Lavin	Anchorage	AK	99507
Mark	Risen	Anchorage	AK	99507
Stanley	Seegars	Anchorage	AK	99507
Daniel	Gagnon	Anchorage	AK	99507
Dawn	Welton	Anchorage	AK	99507
Robin	Guvarra	Anchorage	AK	99507
David	Carufel	Anchorage	AK	99507
Bayley	Rynerson	Anchorage	AK	99507
Adam	Zilko	Anchorage	AK	99507
Kathy	Talcott	Anchorage	AK	99507
Tim	Young	Anchorage	AK	99507
Scott	Parmelee	Anchorage	AK	99507
Kinsie	Young	Anchorage	AK	99507

Mary	Segock	Anchorage	AK	99507
Michael	Wahlig	Anchorage	AK	99507
Jonathan	Jetter	Anchorage	AK	99507
Glenn	Jacks	Anchorage	AK	99507
Irene	Bembenek	Achorage	AK	99507
Mathew	Fifield	Anchorage	AK	99507
Mike	Roy	Anchorage	AK	99507
John	Faoetagoai	Anchorage	AK	99507
Hayden	Hernandez	Anchorage	AK	99507
Scot	Laurell	Anchorage	AK	99507
Michael	Brocius	Anchorage	AK	99507
Lacy	Plummer	Anchorage	AK	99507
Cathryn	Dunn	Anchorage	AK	99507
Devan	Haynes	Anchorage	AK	99507
Tanya	Oconnor	Anchorage	AK	99507
Vivan	Patten	Anchorage	AK	99507
Joyce	Dixon	Anchorage	AK	99507
Clemencia	Merrill	Anchorage	AK	99507
Vera	Tomsen	Anchorage	AK	99507
Taylor	Ede	Anchorage	AK	99507
Dale	King	Anchorage	AK	99507
Joel	Manalo	Anchorage	AK	99507
Kathryn	Dunn	Anchorage	AK	99507
Constance	Boquist	Anchorage	AK	99507
George	Haynes	Anchorage	AK	99507
Jason	Urquhart	Anchorage	AK	99507
Thomas	Burkel	Anchorage	AK	99507
Randy	Smith	Anchorage	AK	99507
Andrew	Metcalf	Anchorage	AK	99507
Carrie	King	Anchorage	AK	99507
Amanda	Keates	Anchorage	AK	99507
Steven	Butts	Anchorage	AK	99507
Angela	Lawrence	Anchorage	AK	99507

Julie	Flynn	Anchorage	AK	99508
Sarah	Holsopple	Anchorage	AK	99508
Lani	Gerken	Anchorage	AK	99508
Barbra	Norrell	Anchorage	AK	99508
Connie	Giddings	Anchorage	AK	99508
Rachel	Fischer	Anchorage	AK	99508
Keri	Iles	Anchorage	AK	99508
Donna	Knutson	Anchorage	AK	99508
Shari	Showalter	Anchorage	AK	99508
Jason	Burkhead	Anchorage	AK	99508
Austin	Michie	Anchorage	AK	99508
Andrew	Kastining	Anchorage	AK	99508
Lulu	Afao	Anchorage	AK	99508
Marah	Gotcsik	Anchorage	AK	99508
Avianna	Mckee	Anchorage	AK	99508
Stephanie	Luck	Anchorage	AK	99508
Becky	Bitzer	Anchorage	AK	99508
Joshua	Mulkey	Anchorage	AK	99508
Megan	Bryant	Anchorage	AK	99508
Brendan	Bonnett	Anchorage	AK	99508
Jasper	Hardison	Anchorage	AK	99508
Sophia	Lee	Anchorage	AK	99508
Steve	McKeever	Anchorage	AK	99508
Marlis	Schimt	Anchorage	AK	99508
Monica	Shah	Anchorage	AK	99508
Courtney	Carothers	Anchorage	AK	99508
Ciara	Johnson	Anchorage	AK	99508
Christopher	Marrano	Anchorage	AK	99508
April	Barios	Anchorage	AK	99508
Stephen	Norrell	Anchorage	AK	99508
Mark	Carlsen	Anchorage	AK	99508
Morgan	Vanzant	Anchorage	AK	99508
Gabriel	Hartsock	Anchorage	AK	99508

Jordan	Jenckes	Anchorage	AK	99508
Joseph	Thomas	Anchorage	AK	99508
Mariia	Hutt	Anchorage	AK	99508
Charles	Folds	Anchorage	AK	99508
Jodi	Rhoades	Anchorage	AK	99508
Thomas	Green	Anchorag3	AK	99508
Larry	Pokladnik	Anchorage	AK	99508
Scott	Cumberland Peterson	Anchorage	AK	99508
Shannon	Apgar	Anchorage	AK	99508
Doug	McKee	Anchorage	AK	99508
Jason	Eson	Anchorage	AK	99508
Joshua	Heinig	Anchorage	AK	99508
Kelly	Hulst	Anchorage	AK	99508
Allison	Beeman	Anchorage	AK	99508
Evan	Sharp	Anchorage	AK	99508
Aaron	Johnson	Anchorage	AK	99508
Pat	Rinehart	Anchorage	AK	99508
Breck	Criag	Anchorage	AK	99508
Deborah	Nance	Anchorage	AK	99508
Michael	Gallagher	Anchorage	AK	99508
William	Rinehart	Anchorage	AK	99508
Egon	Vonlohoffel	Anchorage	AK	99508
Jeffrey	Olsen	Anchorage	AK	99508
Jonathan	Jencks	Anchorage	AK	99508
Mark	Weber	Anchorage	AK	99508
Elaine	Bales	Anchorage	AK	99508
Robert	Hartsock	Anchorage	AK	99508
Roger	Fox	Anchorage	AK	99508
Jaylon	Miller	Anchorage	AK	99508
Thomas	Sedlacek	Anchorage	AK	99508
Nelson	Freelan	Anchorage	AK	99508
Melissa	Fischer	Anchorage	AK	99508
James	Johnson	Anchorage	AK	99508

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Austin	Elliott	Anchorage	AK	99508
Mark	Meyers	Anchorage	AK	99508
Jeff	Williams	Anchorage	AK	99508
Marilyn	Pillifant	Anchorage	AK	99508
Evelynn	Mccormick	Anchorage	AK	99508
Jannet	Curran	Anchorage	AK	99508
Jeff	Olsen	Anchorage	AK	99508
Nicolas	Moncrieff	Anchorage	AK	99508
Jordan	Jenckes	Anchorage	AK	99508
Robert	McClung	Anchorage	AK	99508
Marybeth	Koos	Anchorage	AK	99508
Pj	Nadland	Anchorage	AK	99508
William	Whittenburg	Anchorage	AK	99508
Darin	Smith gaddis	Anchorage	AK	99508
Robert	Hockema	Anchorage	AK	99508
David	Benezra	Anchorage	AK	99508
Amanda	Nunez	Anchorage	AK	99508
Thomas	Sisk	Anchorage	AK	99508
Jesse	Gill	Anchorage	AK	99508
Jennifer	Leigh	Anchorage	AK	99508
Krystin	Philip	Anchorage	AK	99508
Adam	Schnellbaecher	Anchorage	AK	99508
Megan	Hughes	Anchorage	AK	99508
Brent	Ramsay	Anchorage	AK	99508
Jacquelyn	Overbeck	Anchorage	AK	99508
Josh	Mulkey	Anchorage	AK	99508
Mark	Wedikind	Anchorage	AK	99508
Breena	Apgar kurtz	Anchorage	AK	99508
Mark	Sutherlin	Anchorage	AK	99508
Martin	Nance	Anchorage	AK	99508
Marlis	Schmid	Anchorage	AK	99508
Wayne	Helander	Anchorage	AK	99508

Kent	Crandall	Anchorage	AK	99501
Crosby	Hanson	Anchorage	AK	99501
David	Zumbro	Anchorage	AK	99501
Leonid	Grinberg	Anchorage	AK	99501
Austin	Hanacek	Anchorage	AK	99501
Jordan	Thiele	Anchorage	AK	99501
Jackie	Musgrave	Anchorage	AK	99501
Travis	Bundtzen	Anchorage	AK	99501
Daniel	Kelly	Anchorage	AK	99501
Deagan	Carry	Anchorage	AK	99501
Howard	Golden	Anchorage	AK	99501
Janine	Scaoullhorn	Anchorage	AK	99501
James	Spratt	Anchorage	AK	99501
Patrick	Volmer	Anchorage	AK	99501
Taylor	Mogan	Anchorage	AK	99501
Todd	Gilliom	Anchorage	AK	99501
Jason	Collins	Anchorage	AK	99501
Alex	Kraft	Anchorage	AK	99501
James	Liebsask	Anchorage	AK	99501
Lisa	Nelson	Anchorage	AK	99501
Megan	Dister	Anchorage	AK	99501
Duncan	Webster	Anchorage	AK	99501
Amy	Shimek	Anchorage	AK	99501
Thomas	Tatka	Anchorage	AK	99501
Jake	Gray	Anchorage	AK	99501
Myron	Angstman	Anchorage	AK	99501
Christina	Isbell	Anchorage	AK	99501
Sarah	Kleedeahn	Anchorage	AK	99501
Ramona	Meers	Anchorage	AK	99501
Clifford	Gerhart	Anchorage	AK	99501
Mera	Matthews	Anchorage	AK	99501
Sigrun	Franzen	Anchorage	AK	99501
Margaret	Halsey	Anchorage	AK	99501

Riley	Lawrence	Anchorage	AK	99507
Jungae	Noh	Anchorage	AK	99507
Shawn	Main	Anchorage	AK	99507
Elizabeth	Noh	Anchorage	AK	99507
Thomas	Finch	Anchorage	AK	99507
Aramis	Jackson	Anchorage	AK	99507
Michael	Brown	Anchorage	AK	99507
Brian	Delcott	Anchorage	AK	99507
Elyse	Johammes	Anchorage	AK	99507
Corie	Butts	Anchorage	AK	99507
April	Barnes	Anchorage	AK	99507
Glenn	Patton	Anchorage	AK	99507
Michael	Nichols	Anchorage	AK	99507
Cari	Jamieson	Anchorage	AK	99507
Eldar	Latif	Anchorage	AK	99507
Clifford	Shellabarger	Anchorage	AK	99507
Joan	Trujillo	Anchorage	AK	99507
Trevor	Jepsen	Anchorage	AK	99507
Deana	Glick	Anchorage	AK	99507
Steve	Voves	Anchorage	AK	99507
Leland	Williams	Anchorage	AK	99508
Paul	Burns	Anchorage	AK	99508
Mark	Wedekind	Anchorage	AK	99508
William	Soule	Anchorage	AK	99508
Andrew	Zartmann	Anchorage	AK	99508
Jon	Eppard	Anchorage	AK	99508
Troy	Bowler	Anchorage	AK	99508
Larry	Thompson	Anchorage	AK	99508
Thomas	Wilson	Anchorage	AK	99508
Joe	Stock	Anchorage	AK	99508
Leanna	Heffner	Anchorage	AK	99508
Dorothea	Merritt	Anchorage	AK	99508
Jessica	McCartan	Anchorage	AK	99508

Larry	Roe	Anchorage	AK	99508
Allison	Kane	Anchorage	AK	99508
Nicholas	Cropper	Anchorage	AK	99508
Austin	Hess	Anchorage	AK	99508
Katie	Reilly	Anchorage	AK	99508
Alex	Chmielewski	Anchorage	AK	99508
Duncan	Wright	Anchorage	AK	99508
Alex	Nelsen	Anchorage	AK	99508
Anne	Gore	Anchorage	AK	99508
Ameiva	Gove	Anchorage	AK	99508
Megan	O'Mullane	Anchorage	AK	99508
Benjamin	Gross	Anchorage	AK	99508
Zebulon	Holsopple	Anchorage	AK	99508
Raia	Stamm	Anchorage	AK	99508
Josh	Corbett	Anchorage	AK	99508
Clinton	Helander	Anchorage	AK	99508
Mike	Gallager	Anchorage	AK	99508
Liz	Butera	Anchorage	AK	99508
Lynn	McCormick	Anchorage	AK	99508
Zachary	Krochina	Anchorage	AK	99508
Anne	Wellner	Anchorage	AK	99508
Kaysha	Cushing	Anchorage	AK	99508
Jessica	Carlson	Anchorage	AK	99508
Benjamin	Hutt	Anchorage	AK	99508
Pete	Hobbs	Anchorage	AK	99508
Jacquelyne	Woodard	Anchorage	AK	99508
Brian	Houska	Anchorage	AK	99508
Anthony	Wagner	Anchorage	AK	99508
Larry	Lenamond	Anchorage	AK	99508
Lael	Gordon	Anchorage	AK	99508
David	Hinshaw	Anchorage	AK	99508
Carol	Schullef	Anchorage	AK	99508
Heather	Nighswandeir	Anchorage	AK	99508

Nancy	Podgorski	Anchorage	AK	99508
Paul	Butera	Anchorage	AK	99508
Derek	Nashookpuk	Anchorage	AK	99508
James	Lowe	Anchorage	AK	99508
Patricia	Jankins	Anchorage	AK	99508
Alex	Lyle	Anchorage	AK	99508
Kevin	Winnett	Anchorage	AK	99508
Sarah	Kiana	Anchorage	AK	99508
Dave	Bass	Anchorage	AK	99508
Tom	Myhre	Anchorage	AK	99508
Amanda	Hults	Anchorage	AK	99508
Neal	Sidhwaney	Anchorage	AK	99508
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Thomas	Showalter	Anchorage	AK	99508
Steven	Cole	Anchorage	AK	99508
Alison	Kennen	Anchorage	AK	99508
Kipp	Wilkinson	Anchorage	AK	99508
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John	Schuller	Anchorage	AK	99508
Bonnie	Lenaond	Anchorage	AK	99508
Jordan	Whitethorn	Anchorage	AK	99508
Sharon	Cooke	Anchorage	AK	99508
Mary	Alexander	Anchorage	AK	99508
Micah	Bedrosian	Anchorage	AK	99508
Hanna	Mikols	Anchorage	AK	99508
Sefo	Lefao	Anchorage	AK	99508
Terry	Woodhead	Anchorage	AK	99508
Sarah	Stone	Anchorage	AK	99508
Novie	McCabe	Anchorage	AK	99508
Anthony	Hersh	Anchorage	AK	99508
David	Pope	Anchorage	AK	99508
Ellen	Provost	Anchorage	AK	99508
Calvin	Anderson	Anchorage	AK	99508

Sharon	Pope	Anchorage	AK	99508
Lani	Gerken	Anchorage	AK	99508
Selina	Winnett	Anchorage	AK	99508
Jerome	Nasenbeny	Anchorage	AK	99508
Andrew	Behrend	Anchorage	AK	99508
Allison	Kennen	Anchorage	AK	99508
Tom	Sisk	Anchorage	AK	99508
Michael	Jones	Anchorage	AK	99508
Benjamin	Hulst	Anchorage	AK	99508
Corrine	Digiovine	Anchorage	AK	99508
Easton	Stetson	Anchorage	AK	99508
Jason	Stewart	Anchorage	AK	99508
Pat	Krochina	Anchorage	AK	99508
Stephen	Griffith	Anchorage	AK	99508
Gregg	Schomaker	Anchorage	AK	99508
Gayle	Soule	Anchorage	AK	99508
Bruce	Woods	Anchorage	AK	99508
Karen	Sedlacek	Anchorage	AK	99508
Anthony	Kiana	Anchorage	AK	99508
Aaron	Bass	Anchorage	AK	99508
Carolyn	Cox	Anchorage	AK	99508
William	Whittenburg	Anchorage	AK	99508
Joe	Nedland	Anchorage	AK	99508
Becky	Iles	Anchorage	AK	99508
Christina	Laborde	Anchorage	AK	99508
Carla	Burkhead	Anchorage	AK	99508
Kevin	Apgar	Anchorage	AK	99508
Marc	Spooner	Anchorage	AK	99508
Alana	King Weaver	Anchorage	AK	99508
William	Holliday	Anchorage	AK	99508
Joseph	Baldus	Anchorage	AK	99508
Emily	Woodhead	Anchorage	AK	99508
Jeremy	Wilson	Anchorage	AK	99508

Amanda	Ramsay	Anchorage	AK	99508
James	Gove	Anchorage	AK	99508
Pamela	Williams	Anchorage	AK	99508
Benjamin	Elbow	Anchorage	AK	99508
Alexandra	Evans	Anchorage	AK	99508
Marie	Koitsalu	Anchorage	AK	99508
Cody	Nix	Anchorage	AK	99508
Tyler	Thammavongsa	Anchorage	AK	99508
Keelan	Nauheim	Anchorage	AK	99508
Mason	Stetson	Anchorage	AK	99508
Georgie	Schulte	Anchorage	AK	99508
Emily	Madsen	Anchorage	AK	99508
Gordon	Phillips	Anchorage	AK	99508
Patrick	Folds	Anchorage	AK	99508
Amy	Chaille	Anchorage	AK	99508
Reagan	Cox	Anchorage	AK	99508
Kalani	Cadiz	Anchorage	AK	99515
Elaine	Royal	Anchorage	AK	99515
Ravinder	Mashiana	Anchorage	AK	99515
Chad	Wilson	Anchorage	AK	99515
Madeline	Miller	Anchorage	AK	99515
Shawn	Farrer	Anchorage	AK	99515
Luke	Hillhouse	Anchorage	AK	99515
Wesley	Barry	Anchorage	AK	99515
Nicholas	Moran	Anchorage	AK	99515
Charles	Rindone	Anchorage	AK	99515
Nicole	Barry	Anchorage	AK	99515
Elke	Mulligan	Anchorage	AK	99515
Richard	Oconnor	Anchorage	AK	99515
George	Garner	Anchorage	AK	99515
Chong	Park	Anchorage	AK	99515
David	Russell	Anchorage	AK	99515
Selena	Spiller	Anchorage	AK	99515

Melissa's	Harnish	Anchorage	AK	99515
John	Godersky	Anchorage	AK	99515
Nathan	Dickhaus	Anchorage	AK	99515
Matthew	Malone	Anchorage	AK	99515
Mark	Merchant	Anchorage	AK	99515
Timothy	Nichols	Anchorage	AK	99515
Sally	Kessler	Anchorage	AK	99515
Terri	McCoy	Anchorage	AK	99515
Michael	Fenster	Anchorage	AK	99515
Evan	Kessler	Anchorage	AK	99515
Virginia	Mongeau	Anchorage	AK	99515
John	Guerard	Anchorage	AK	99515
Susan	Langston	Anchorage	AK	99515
Joe	Servito	Anchorage	AK	99515
Heath	Kimball	Anchorage	AK	99515
Maria	Hillhouse	Anchorage	AK	99515
Heather	Double	Anchorage	AK	99515
Toby	Ovod-Everett	Anchorage	AK	99515
Brooke	Duggan	Anchorage	AK	99515
Claudia	Hernandez	Anchorage	AK	99515
Kristen	Malone	Anchorage	AK	99515
Michael	Sewell	Anchorage	AK	99515
David	Shaw	Anchorage	AK	99515
Kirk	Peterson	Anchorage	AK	99515
Chad	Peabody	Anchorage	AK	99515
Everett	Honegger	Anchorage	AK	99515
Heath	Kimball	Anchorage	AK	99515
Rita	Ingrim	Anchorage	AK	99515
Brandon	McGuire	Anchorage	AK	99515
Chad	Wilson	Anchorage	AK	99515
Handel	Wellington	Anchorage	AK	99515
Gwenyth	Crabtree	Anchorage	AK	99515
Chris	Jacobson	Anchorage	AK	99515

Alyxandria	Danger	Anchorage	AK	99515
David	Shumway	Anchorage	AK	99515
Russel	Gallen	Anchorage	AK	99515
Rowdy	Harnish	Anchorage	AK	99515
Aine	Aylward	Anchorage	AK	99515
Bobbie	Veach	Anchorage	AK	99515
Yasmine	Lewis	Anchorage	AK	99515
Brooke	Duggan	Anchorage	AK	99515
Cathy	Russell	Anchorage	AK	99515
Kristen	Mashiana	Anchorage	AK	99515
Brenda	Clevalanda	Anchorage	AK	99515
Tobermory	Ovod everett	Anchorage	AK	99515
Doug	Ryan	Anchorage	AK	99515
Mahlon	Cleveland	Anchorage	AK	99515
Kristen	Moran	Anchorage	AK	99515
Suzy	Humbach	Anchorage	AK	99515
Kristin	Klingenstein	Anchorage	AK	99515
Bonnie	Young	Anchorage	AK	99515
Brandice	Hyatt	Anchorage	AK	99515
Ryan	Stattner	Anchorage	AK	99515
Suzy	Hambach	Anchorage	AK	99515
Hanh	Le griffin	Anchorage	AK	99515
Hiram	Hernandez	Anchorage	AK	99515
Robert	Spiller	Anchorage	AK	99515
Terence	Grider	Anchorage	AK	99515
Erin	Monro	Anchorage	AK	99515
Melissa	Kothe	Anchorage	AK	99515
Rod	Worl	Anchorage	AK	99515
George	Garner	Anchorage	AK	99515
Melissa	Lipinski	Anchorage	AK	99515
Daniel	Nichols	Anchorage	AK	99515
Sherrie	Ledoux	Anchorage	AK	99515
Maria	De Leon	Anchorage	AK	99515

Amanda	Herrmann	Anchorage	AK	99515
Melissa	Lipinski	Anchorage	AK	99515
Leah	Mckune	Anchorage	AK	99515
Bart	Aylward	Anchorage	AK	99515
Max	Klingenstein	Anchorage	AK	99515
Moriah	Miles	Anchorage	AK	99515
Grayson	Shaw	Anchorage	AK	99515
Chuck	Livers	Anchorage	AK	99516
Aimee	Lucia	Anchorage	AK	99516
Harold	Haynes	Anchorage	AK	99516
Dana	Mitchell	Anchorage	AK	99516
Chris	Haynes	Anchorage	AK	99516
Steve	Judd	Anchorage	AK	99516
Garrett	Judd	Anchorage	AK	99516
William	McBride	Anchorage	AK	99516
Dena	Mitchell	Anchorage	AK	99516
Lynn	Palensky	Anchorage	AK	99516
Dee	Allenbrand	Anchorage	AK	99516
Chya	Stranger	Anchorage	AK	99516
David	Stranger	Anchorage	AK	99516
Brandi	Beckman	Anchorage	AK	99516
Sean	Farley	Anchorage	AK	99516
Andy	Maguire	Anchorage	AK	99516
Karl	Lemmerman	Anchorage	AK	99516
Richard	Rothstein	Anchorage	AK	99517
Mark	Johannes	Anchorage	AK	99517
Kirby	Maury	Anchorage	AK	99517
Martin	Hall	Anchorage	AK	99517
Jens	Laipenieks	Anchorage	AK	99517
William	Mans	Anchorage	AK	99517
Ed	Silcox	Anchorage	AK	99517
Ken	Acton	Anchorage	AK	99517
Alan	Thomas	Anchorage	AK	99517

Robert	Mellin	Anchorage	AK	99517
Mark	Wiggin	Anchorage	AK	99517
Colleen	Handel	Anchorage	AK	99517
Susan	Reeves	Anchorage	AK	99517
Marilyn	May	Anchorage	AK	99517
Jennifer	Deitz	Anchorage	AK	99517
Jo	Fields	Anchorage	AK	99517
Helen	Trainor	Anchorage	AK	99517
Linda	Farr	Anchorage	AK	99517
Pam	Slater	Anchorage	AK	99517
Leslie	Jaehning	Anchorage	AK	99517
Steven	Hobbs	Anchorage	AK	99517
Nathan	Levine	Anchorage	AK	99517
Jennifer	Toby	Anchorage	AK	99517
Joel	Wieman	Anchorage	AK	99517
Drew	Dawson	Anchorage	AK	99517
Joan	Frankevich	Anchorage	AK	99517
Samuel	Yarian	Anchorage	AK	99517
Russ	Painter	Anchorage	AK	99517
Katherina	Bang	Anchorage	AK	99517
Katherine	Moon	Anchorage	AK	99517
Dennis	Berry	Anchorage	AK	99517
Alberto	Dizon	Anchorage	AK	99517
John	Williams	Anchorage	AK	99517
Ella	Nordlund	Anchorage	AK	99517
Ursala	Knudsen Iatta	Anchorage	AK	99517
Anjali	Madeira	Anchorage	AK	99517
Eiden	Pospisil	Anchorage	AK	99517
Zachary	Babb	Anchorage	AK	99517
Alex	Johnson	Anchorage	AK	99517
Todd	Croly	Anchorage	AK	99517
Matthew	Hamby	Anchorage	AK	99517
Chris	Shelden	Anchorage	AK	99517

Lisa	Wolf	Anchorage	AK	99517
Toni	Maury	Anchorage	AK	99517
Beth	Daly	Anchorage	AK	99517
Michael	Rouse	Anchorage	AK	99517
Max	Rosefigura	Anchorage	AK	99517
Brandy	Bland	Anchorage	AK	99517
Jamie	Mcgrady	Anchorage	AK	99517
Jessica	Stolp	Anchorage	AK	99517
Carter	Stolp	Anchorage	AK	99517
Peter	Van brunt	Anchorage	AK	99517
Szilvia	Salamon	Anchorage	AK	99517
Hanna	Heffern	Anchorage	AK	99517
Linda	Pharr	Anchorage	AK	99517
Nicole	Olsen	Anchorage	AK	99517
Hana	Bakalli	Anchorage	AK	99517
Aaron	Makkar	Anchorage	AK	99517
Alu	Afolabi	Anchorage	AK	99517
Cindy	Mans	Anchorage	AK	99517
Michael	Barber	Anchorage	AK	99517
Patty	Crowfoot	Anchorage	AK	99517
Michelle	McCarten	Anchorage	AK	99517
Brenton	Alexander	Anchorage	AK	99517
Richard	Tweet	Anchorage	AK	99517
Mark	Houston	Anchorage	AK	99517
Helen	Malley	Anchorage	AK	99517
Gus	Compton	Anchorage	AK	99517
Brandi	Crosby	Anchorage	AK	99517
Steve	Kim	Anchorage	AK	99517
Jo	Hobbs	Anchorage	AK	99517
Markus	Kirchner	Anchorage	AK	99517
Peter	Kirchner	Anchorage	AK	99517
James	Lawlor	Anchorage	AK	99517
Bryn	Pallesen	Anchorage	AK	99517

Anthony	Fischbach	Anchorage	AK	99517
Mark	Drotar	Anchorage	AK	99517
Don	Deitz	Anchorage	AK	99517
Samantha	Cherot	Anchorage	AK	99517
Eric	Steward	Anchorage	AK	99517
Dawn	Bloechl	Anchorage	AK	99517
Cameron	Pattison	Anchorage	AK	99517
Melisa	Babb	Anchorage	AK	99517
Elyea	Cobban	Anchorage	AK	99517
Duff	Pfanner	Anchorage	AK	99517
Larry	Persily	Anchorage	AK	99517
Sam	Trefry	Anchorage	AK	99517
Sean	Franey	Anchorage	AK	99517
James	Berry	Anchorage	AK	99517
Mike	Fields	Anchorage	AK	99517
Peggy	Looney	Anchorage	AK	99517
Thomas	Wolf	Anchorage	AK	99517
Jade	Najjar	Anchorage	AK	99517
Betany	Porter	Anchorage	AK	99517
Katharine	Baker	Anchorage	AK	99517
Jan	Fischbach	Anchorage	AK	99517
James	Powell	Anchorage	AK	99517
Bruce	Lalonde	Anchorage	AK	99517
Nicholas	Laipenieks	Anchorage	AK	99517
Patricia	Clay	Anchorage	AK	99517
Dunnington	Babb	Anchorage	AK	99517
Daniel	Slater	Anchorage	AK	99517
Brian	Crewdson	Anchorage	AK	99517
Michelle	Kohinka	Anchorage	AK	99517
Mandi	Priebe	Anchorage	AK	99517
Chloe	Greenhalgh adam	Anchorage	AK	99517
Keaton	Bolick	Anchorage	AK	99517
Katura	Willingham	Anchorage	AK	99517

Jacob	Parrish	Anchorage	AK	99517
Erika	Green	Anchorage	AK	99517
Laura	Norton-Cruz	Anchorage	AK	99517
Cynthia	Ferguson	Anchorage	AK	99517
Debra	Caldera	Anchorage	AK	99517
Barbara	Maxwell	Anchorage	AK	99517
Anna	Kohl	Anchorage	AK	99517
Stephen	Mayer	Anchorage	AK	99517
Steve	Fishback	Anchorage	AK	99517
Ronald	Moon	Anchorage	AK	99517
Sue	Hovland	Anchorage	AK	99517
Lorraine	Kotra	Anchorage	AK	99517
Galen	Jones	Anchorage	AK	99517
Morgan	Michelsohn	Anchorage	AK	99517
Donna	Brechan	Anchorage	AK	99517
Daniel	Greenhalgh	Anchorage	AK	99517
Jeff	Galliher	Anchorage	AK	99517
George	Madeira	Anchorage	AK	99517
Chandler	Christensen	Anchorage	AK	99517
Daniel	Hartman	Anchorage	AK	99517
Brad	Garland	Anchorage	AK	99517
Ellie	Servia	Anchorage	AK	99517
Kelly	Sandberg	Anchorage	AK	99517
Terry	Muehlenbach	Anchorage	AK	99517
Bob	Miller	Anchorage	AK	99517
Philip Nevitt	Medina	Anchorage	AK	99517
Brent	Howell	Anchorage	AK	99517
Jovani	Villanueva	Anchorage	AK	99517
Erin	Heysell	Anchorage	AK	99517
Amy	Darrell	Anchorage	AK	99517
Erin	Reding	Anchorage	AK	99517
Gerard	Luken	Anchorage	AK	99517
Cara	O'Brien-Holen	Anchorage	AK	99517

Annette	Kasprzak	Anchorage	AK	99517
Stephen	Fishback	Anchorage	AK	99517
Daniel	Senner	Anchorage	AK	99517
Patrica	Clay	Anchorage	AK	99517
Robert	Mcneil	Anchorage	AK	99517
Caroline	McGhan	Anchorage	AK	99517
Antonio	Santana	Anchorage	AK	99517
David	Litteral	Anchorage	AK	99517
Christopher	Tate	Anchorage	AK	99517
Robert	Silva	Anchorage	AK	99517
Torzer	Sennhove	Anchorage	AK	99517
Kathy	Atkinson	Anchorage	AK	99517
Annalise	Klein	Anchorage	AK	99517
Rachel	Kittoe	Anchorage	AK	99517
Sharyn	Sexton	Anchorage	AK	99517
Susan	Komensky hamilton	Anchorage	AK	99517
Mesa	Rock	Anchorage	AK	99517
Eric	Kross	Anchorage	AK	99517
Kyle	Reding	Anchorage	AK	99517
Andrew	Dawson	Anchorage	AK	99517
Isaac	Vanderburg	Anchorage	AK	99517
Robert	Glascott	Anchorage	AK	99517
Harold	Painter	Anchorage	AK	99517
Joseph	Van de mark	Anchorage	AK	99517
Leif	Hovland	Anchorage	AK	99517
Victoria	Gellert	Anchorage	AK	99517
Sheila	Borer	Anchorage	AK	99517
Ryan	Haynes	Anchorage	AK	99517
Elizabeth	Nordlund	Anchorage	AK	99517
Diana	Steer	Anchorage	AK	99517
Megan	McBride	Anchorage	AK	99517
Annie	Belts	Anchorage	AK	99517
Hugo	Delacruz	Anchorage	AK	99517

John	Fletcher	Anchorage	AK	99517
Douglas	Robbins	Anchorage	AK	99517
Christine	Silva	Anchorage	AK	99517
Andrea	Senn	Anchorage	AK	99517
Benjamin	Houston speckman	Anchorage	AK	99517
Wiley	Bland	Anchorage	AK	99517
Stephen	Mare	Anchorage	AK	99517
Chelsea	Phelps	Anchorage	AK	99517
Alyssa	Gardner	Anchorage	AK	99517
Dawn	Snider	Anchorage	AK	99517
Robert	Gill	Anchorage	AK	99517
Tara	Ness	Anchorage	AK	99517
Wade	Strickland	Anchorage	AK	99517
Kurtis	Gibson	Anchorage	AK	99517
David	Steer	Anchorage	AK	99517
James	Reeves	Anchorage	AK	99517
Brian	Edwards	Anchorage	AK	99517
Quinsey	Jorgenson delacruz	Anchorage	AK	99517
Denise	N	Anchorage	AK	99517
Kristin	Knudstn	Anchorage	AK	99517
Kim	Kloecker	Anchorage	AK	99517
Grayson	Conti	Anchorage	AK	99517
Sydney	Tarzwell	Anchorage	AK	99517
Dawn	Johnson lottsfeldt	Anchorage	AK	99517
Susan	Hamilton	Anchorage	AK	99517
Linda	Pope	Anchorage	AK	99517
Kimberly	Rudge-Karic	Kasilof	AK	99610
Catherine	Cassidy	Kasilof	AK	99610
Robert	Taylor	Kenai	AK	99611
Marion	Nelson	Kenai	AK	99611
Camille	Botello	Kenai	AK	99611
Rebecca	Bezdecny	Kenai	AK	99611

Steven	Bezdecny	Kenai	AK	99611
Steven	Russel	Kenai	AK	99611
Scott	Rob	Moose Pass	AK	99631
Scott	Ferguson	Nikiski	AK	99635
Holly	Zwink	Nikiski	AK	99635
Fr Randy	Hillman	Wasilla	AK	99654
Tracy	Squires	Seward	AK	99664
David	Squires	Seward	AK	99664
Quentin	Carr	Seward	AK	99664
James	Fredrickson	Seward	AK	99664
Tyler	Mallory	Seward	AK	99664
Roger	Day	Seward	AK	99664
Amy	Haddow	Seward	AK	99664
EO	Pleuka Jr.	Seward	AK	99664
Michelley	Kowalski	Seward	AK	99664
Chip	Arnold	Seward	AK	99664
Phyllis	Shoemaker	Seward	AK	99664
Mark	Kansteiner	Seward	AK	99664
Veronica	Mullen	Seward	AK	99664
Josh	Mullen	Seward	AK	99664
Gerald	Olive	Seward	AK	99664
Sandra	Stolle	Seward	AK	99664
Charles	McEldowney	Seward	AK	99664
Michelley	Blalock	Seward	AK	99664
Jim	Pfeiffenberger	Seward	AK	99664
Lori	Landstrom	Seward	AK	99664
Christina	Kriedeman	Seward	AK	99664
Jim	Shirk	Seward	AK	99664
Demitra	Apergis	Seward	AK	99664
Doug	Grant	Seward	AK	99664
Dave	Papgrman	Seward	AK	99664
Philip	Kaluza	Seward	AK	99664
Walker	Gabriel	Seward	AK	99664

Marjorie	McEldowney	Seward	AK	99664
Sheila	Morrow	Seward	AK	99664
Heather	Shank	Seward	AK	99664
Steve	Pdutz	Seward	AK	99664
David	Biggs	Seward	AK	99664
Heather	Johnston	Seward	AK	99664
Lars	Olson	Seward	AK	99664
Jen	Wells	Seward	AK	99664
Christine	Simpson	Seward	AK	99664
Dorothy	Osenga	Seward	AK	99664
Kari	Atwood	Seward	AK	99664
Sandy	Pelishek	Seward	AK	99664
John	Eavis	Seward	AK	99664
Markus	Horning	Seward	AK	99664
Mary Beth	Koster	Seward	AK	99664
Bronson	Berg	Seward	AK	99664
Charles	Lechner	Seward	AK	99664
Chad	Lechner	Seward	AK	99664
Chance	Lechner	Seward	AK	99664
Debra	Lechner	Seward	AK	99664
Susan	St Amand	Seward	AK	99664
Kathleen	Boulette	Seward	AK	99664
Emilee	Sawyer	Seward	AK	99664
Patricia	Linville	Seward	AK	99664
Jean	Bardarson	Seward	AK	99664
Valerie	Kingsland	Seward	AK	99664
Diane	Liles	Seward	AK	99664
David	Anesony	Seward	AK	99664
Tara	Rumin	Seward	AK	99664
Erik	Hendrickson	Soldotna	AK	99669
John	van Orden	Soldotna	AK	99669
Kevin	McNeal	Soldotna	AK	99669
Robert	Wall	Soldotna	AK	99669

Heather	Hooper	Soldotna	AK	99669
Bobbi	Stelljes	Soldotna	AK	99669
Jenni	Scott	Soldotna	AK	99669
Bill	Berkhahn	Soldotna	AK	99669
Mitchell	Michaud	Soldotna	AK	99669
Denmac	Bydau	Soldotna	AK	99669
Steve	Caswell	Soldotna	AK	99669
Debbie	Standefer	Soldotna	AK	99669
Barbara	Dilley	Soldotna	AK	99669
Stacy	Correia	Soldotna	AK	99669
Chad	Anderson	Soldotna	AK	99669
Jacqueline	Smith	Soldotna	AK	99669
Thomas	Kobylarz	Soldotna	AK	99669
John	Kobylarz	Soldotna	AK	99669
Estelle	Parks	Soldotna	AK	99669
Shauna	Bryers	Soldotna	AK	99669
Robert	Mikunda	Soldotna	AK	99669
Ouida	Parker	Soldotna	AK	99669
William	Glick	Soldotna	AK	99669
William	Howell	Sterling	AK	99672
Kevin	Cassidy	Sterling	AK	99672
Patricia	Eichholz	Sterling	AK	99672
Cathy	Turner	Sterling	AK	99672