

Paul Roberts

Founder

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The Honorable Members of the Ohio State Senate Financial Institutions and Technology Committee

Re SB 73 - The Digital Fair Repair Act

Dear Senators:

My name is Paul Roberts and I am the founder of SecuRepairs.org and Editor in Chief of The Security Ledger. I am writing you to express my support for **SB 73** to require fair access to parts, tools, service information and repair software. I believe this legislation is a common-sense step to cut consumer costs and decrease harmful electronic waste. As a recognized expert in information security, I also wish to assure you that the provisions of this bill will not put citizens, business or public sector organizations at greater risk of cyber attack.

No Cyber Risk In Repair

You have been told by manufacturers and industry lobbyists that digital right to repair bills such as the one you are considering create cyber security risks that will lead to hacks, data theft and other undesirable outcomes. In this and other state houses, these industry representatives have argued that asking manufacturers to make available to customers the same schematic diagrams and diagnostic tools that they already supply to their authorized repair partners is a security risk that is not worth taking.

Let me be blunt: these claims *are simply not true*.

Internet of Things Insecurity isn't about Repair

How do I know? Let me state the obvious: because we have no digital "right to repair" today. What we do have is an epidemic of cyber attacks and compromises of connected electronic devices and Internet of Things products. Malicious "botnets" composed of hacked home routers, webcams and other devices, today, form vast, global networks that are platforms for denial of service attacks, spam and malicious software distribution. A novelty as recently as 4 years ago, these are now among the top threats facing businesses large and small.

The connected devices that make up these IoT botnets are not compromised because cyber criminals read their way through service manuals or game diagnostic codes and tools. So how are they hacked? It's easy. Today, home electronics, smart home devices, appliances, even machinery roll off the assembly line and ship to customers with exploitable software vulnerabilities. Other devices are insecure by design or in how they are deployed. They contain the digital equivalent of unlocked or unlockable doors that malicious actors can

step through.

Some questions to ask repair opponents

Of course, the message you will be hearing from industry representatives is very different from this. They will argue that the opposite is true: that the security of the software that runs their devices and the integrity of their customers' data is their top priority. Based on their actions, there simply is not any evidence that these claims are true.

What can you do? First: listen to what cyber security experts, rather than industry lobbyists say. I am a volunteer with Securepairs (securepairs.org), a not for profit group of more than 200 of the country's top information security experts. Our members include leading executives, academics, security researchers and information security professionals who support a digital right to repair.

Second, ask tough questions and push back on the false narrative being pushed by industry that owner and independent repair poses a security risk. They claim security is their top concern. Make them prove it to you. How?

- Ask them if they have any empirical evidence to support their assertion that repairs conducted by their authorized repair professionals are in any way superior to repair conducted by owners and independent repair professionals.
- Ask them if they have any empirical evidence that supports their assertion that authorized repair professionals are more trustworthy or less likely to misuse customer data than owners or independent professionals.
- If they represent an electronics firm, ask them how many open software security vulnerabilities (CVEs) exist for their supported products and what the average length of time it takes to issue patches for those is.
- Ask them if they have any open CVEs with severity of 8 or greater and how long they have been open (unpatched)
- Ask them to attest that the data stored on their devices and sent to and from them is secured with strong, unbreakable encryption.

Repair: Pro-Consumer, Pro-Competition, Pro-Environment

The ability of individuals to service, repair and maintain their own property is a core right of ownership that has been recognized in U.S. law and common law for centuries. **SB 73** updates those basic, consumer and private property rights for a digital age, as manufacturers seek to turn hundreds of millions of owners into tenants of their own technology.

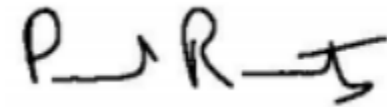
In a world that is increasingly populated by Internet-connected, software powered objects - the so-called "Internet of Things" - a digital right to repair is a vital tool that will extend the life of electronic devices, ensure their safety, security and integrity. In the process, it will make homes, businesses, schools, cities and towns across Ohio more secure and less vulnerable to cyber attacks and other malicious behavior.

Finally, in this time of increasing wealth inequality and concentrations of

market power by large technology firms, a digital right to repair ensures that the spoils of the coming Internet of Things are distributed equally to consumers, communities and small businessmen and women.

The digital right to repair laws you are considering today are a rare spectacle. They are simultaneously pro-competition, pro-consumer and pro-environment. I urge each of you to vote to pass these bills out of your Committee and that the full legislature have the opportunity to act on them this year.

Sincerely,

A handwritten signature in black ink, appearing to read "P. Roberts". The letters are stylized and connected, with a horizontal line extending from the end of the signature.

Paul Roberts, Founder [SecureRepairs.org](https://www.securerepairs.org)