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Louisville, KY 40225 U.S.A.



GE APPLIANCES
a Haier company

April 26, 2019

VIA EMAIL (email: sjud.exhibits@oregonlegislature.gov)

Oregon Senate Judiciary Committee
The Honorable Floyd Prozanski
The Honorable Kim Thatcher

Cc: Senators Thatcher, Bentz, Fagan, Gelser,
Linthicum, Manning
Committee Counsel Fisher

Re: **GE Appliances' Comments, House Bill 2395,
Security of Internet Connected Devices
OPPOSE UNTIL AMENDED**

Dear Chairman Prozanski and Vice-Chair Thatcher:

GE Appliances appreciates the opportunity to share its view regarding HB 2395, a bill addressing security features for devices connected to the Internet. We support and incorporate by reference comments by the Association of Home Appliance Manufacturers submitted at the April 29 public hearing and respectfully urge you to amend H.B. 2395 for the following reasons.

GE Appliances, a Haier company, ("GEA") is a leading manufacturer of home appliances including, as relevant to this bill, internet-enabled major appliances. GEA is as committed to developing innovative connected appliances as we are to ensuring a secure connected home appliance experience that protects consumers' personal data.

We do this by employing recognized and proven processes and methodology to protect the information our connected products collect, store, and transmit. In developing these security measures GEA is conscious that product security technology is constantly evolving and changing in response to the dynamic threat landscape.

The approach of HB 2395 toward the security measures to be adopted by manufacturers of connected devices is in GEA's view overly prescriptive and not designed to keep pace with rapidly changing cybersecurity risks. For this reason, we urge Oregon to modify the bill to recognize that reliance on national consensus-based cybersecurity standards provide a valid means for ensuring reasonable security features. National consensus standards reflect the most widely accepted view on the measures necessary to help ensure "reasonable security".

The legislature should also mirror the California cybersecurity law enacted in 2018. That measure stipulates that its provisions do not apply to connected devices subject to security requirements under federal law, regulations or guidance. The current version of HB 2395 does not cover "federal guidance."

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GEA would support HB2395 only if the language of section 1(2) were modified to include a definition of reasonable security that is based on national consensus standards for cybersecurity measures.

GE Appliances appreciates the opportunity to submit these comments and fully supports the additional bill improvements suggested in AHAM's written comments.

Please contact me should you wish additional information.

Sincerely,



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*Managing Counsel, GE Appliances, a Haier
company*