

August 22, 2023

The Honorable Susan Eggman
State Senator
California State Capitol
1021 O Street, Suite 8530
Sacramento, CA 95814



SB 244 (Eggman) – Support as Amended

Dear Senator Eggman:

Apple is proud to be a California company that makes world-class products enjoyed by Californians and customers the world over. Apple designs its products with the consumer in mind, providing a seamless customer experience that prioritizes protecting consumer safety, privacy and security.

Today, **Apple writes in support of SB 244**, and urges members of the California legislature to pass the bill as currently drafted.

Creating long-lasting products requires an approach that combines durable hardware materials and designs, ongoing software updates that unlock new features and functionality, and when needed - high-quality repair services. Apple teams are constantly working to innovate and strike the right balance between designing for durability and designing for ease of repair. In recent years, Apple has taken significant steps to expand options for consumers to repair their devices which we know is good for consumers' budgets and good for the environment. In that spirit, we have appreciated the opportunity to engage with you and your staff on SB 244 (Eggman), California's proposed Right to Repair Act, to help ensure California consumers have the resources available to safely repair their devices in a manner that does not compromise their privacy or data security.

Along with increasing the durability and repairability of our products, we have worked to expand the options consumers have when their devices do need repair. In 2016, we expanded our **Authorized Repair Provider Program**, through which businesses could access Apple's repair database, as well as genuine repair parts, tools, diagnostics and manuals. This program currently provides customers with additional Apple-certified options to repair their iPhone or other Apple products. In 2019, we expanded our repair offerings to include the **Independent Repair Provider Program** that grants repair providers of all sizes access to the same resources, and gives them the option to use genuine parts or other parts to offer repairs to consumers. This program now has grown to over 4,500 locations worldwide. With this expansion, there are now over 100,000 active technicians across our repair channels. In 2022, Apple introduced the **Self-Service Repair Program**, which provides individual device owners with manuals and

access to parts and tools to repair most iPhone, iMac, and Mac products manufactured in 2022 or afterward. Through these programs, Apple has expanded the options consumers have for repairs and provides increased access to its repair resources for customers and repair providers.

We support SB 244 because it includes requirements that *protect* individual users' safety and security, as well as product manufacturers' intellectual property. We will continue to support the bill, *so long as* it continues to provide protections for customers and innovators, including:

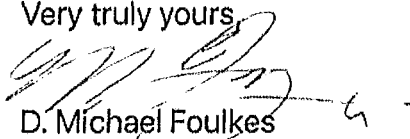
- Assurances that the bill would not threaten consumer safety and data security by requiring that manufacturers allow repair providers to disable device security features, many of which have been requested by law enforcement agencies and required by law to thwart theft,
- Focus on requiring manufacturers obligations to provide the documentation, tools, and parts to enable the repairs performed by authorized repair channels, as opposed to a broader undefined scope of repairs which may compromise consumer physical safety, repair reliability, and device integrity,
- Requirements that repair providers disclose the use of non-genuine or used parts, and
- Prospective application that would allow manufacturers to focus on building new products that comply with the proposal.

California's final Right to Repair bill should balance device integrity, usability, and physical safety with the desire of consumers to be able to repair, rather than replace, a device when it needs repair. Legislation that correctly balances these concerns will ensure that manufacturers are able to comply with the law while protecting consumers and their devices.

Apple appreciates the opportunity to support your efforts to improve consumer options in California, and we are happy to continue to engage in further, more substantive discussion of the key provisions we believe are essential to a Device Repair bill that prioritizes consumer choice and reliable repairs.

Thank you for your consideration.

Very truly yours,



D. Michael Foulkes
Director
State and Local Government Affairs
Apple Inc.