

# ConsumersUnion®

## POLICY & ACTION FROM CONSUMER REPORTS

February 6, 2018

The Honorable Senator Hannah-Beth Jackson  
State Capitol, Room 2032  
Sacramento, CA 95814

Re: SB 327 (Jackson)—SUPPORT

Dear Senator Jackson,

Consumers Union, the advocacy division of Consumer Reports,<sup>i</sup> writes to inform you of our support for SB 327.

Although consumers benefit from the added functionality that connected products (such as home voice assistants<sup>ii</sup>) provide, it is difficult for them to evaluate which connected products will keep their data secure. Connected devices are increasingly used in the home and collect highly sensitive information such as audio and video recordings. Many of these devices are built without adequate security, allowing, for instance, open viewing of home security systems and baby monitor feeds.<sup>iii</sup> In order for consumers to use these products with confidence, manufacturers must take reasonable measures to ensure that the data the device collects is secure.

This issue is especially concerning when it comes to children's connected devices. Indeed, research on connected toys<sup>iv</sup> and smartwatches<sup>v</sup> designed for children has exposed serious data security vulnerabilities, allowing nefarious actors to spy on children or access their geolocation. For instance, with the My Friend Cayla doll, an individual could use the unsecured device to listen to the child playing with the doll. In an even more concerning case, research found that children's smartwatches were built without sufficient security measures, allowing a stranger to track and communicate with the child wearing the watch.

California residents need the protections that SB 327 would provide. This bill would help protect Californians' privacy and security by requiring that connected devices be equipped with reasonable security protections to safeguard sensitive audio, video, geolocation, and general health information consumers share with the connected product. For these reasons, Consumers Union is proud to support this measure.

Sincerely,

Consumers Union  
1101 17th Street, NW  
Suite 500  
Washington, DC 20036

---

<sup>i</sup> Consumer Reports is the world's largest independent product-testing organization. It conducts its advocacy work in the areas of privacy, telecommunications, financial services, food and product safety, health care, and other areas. Using its dozens of labs, auto test center, and survey research department, the nonprofit organization rates thousands of products and services annually. Founded in 1936, Consumer Reports has over 7 million subscribers to its magazine, website, and other publications.

<sup>ii</sup> See, e.g., Jacob Kastrenakes, *Google Sold Over 6 Million Home Speakers since mid-October*, THE VERGE (Jan. 5, 2018), <https://www.theverge.com/2018/1/5/16855982/google-home-sales-figures-holidays-2017>.

<sup>iii</sup> *FTC Approves Final Order Settling Charges Against TRENDnet, Inc.*, FED. TRADE COMM'N (Feb. 7, 2014), <https://www.ftc.gov/news-events/press-releases/2014/02/ftc-approves-final-order-settling-charges-against-trendnet-inc>, and see *ASUS Settles FTC Charges that Insecure Home Routers and "Cloud" Services Put Consumers' Privacy at Risk*, FED. TRADE COMM'N (Feb. 23, 2016), <https://www.ftc.gov/news-events/press-releases/2016/02/asus-settles-ftc-charges-insecure-home-routers-cloud-services-put>.

<sup>iv</sup> *Internet-Connected Toys are Spying on Kids, Threatening their Privacy and Security*, CONSUMERS UNION (Dec. 6, 2016), <https://consumersunion.org/news/internet-connected-toys-are-spying-on-kids-threatening-their-privacy-and-security/>.

<sup>v</sup> *Consumers Union Renews Call for FTC to Investigate Reports of Security, Privacy Concerns with Smartwatches for Kids*, CONSUMERS UNION (Dec. 7, 2017), <http://consumersunion.org/news/consumers-union-renews-call-for-ftc-to-investigate-reports-of-security-privacy-concerns-with-smartwatches-for-kids/>.