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**Support, with Amendment**  
**HB 2395, Security of Internet Connected Devices**

**Before the Oregon State Judiciary Committee**  
**April 29, 2019**

Chairman Prozanski and Vice Chair Thatcher, thank you for the opportunity to provide commentary on HB 2395, a bill addressing security features for Internet-connected devices.

Whirlpool Corporation is the number one appliance manufacturer in the world, with approximately \$21 billion in annual sales, 26,000 U.S. employees, and nine U.S. manufacturing facilities. We sell major and small appliances under brand names such as Whirlpool, Maytag, KitchenAid, Amana, and Jenn-Air.

Whirlpool is committed to the security, safety and protection of our consumers and we agree with the intent of HB 2395 to ensure strong cyber protections for connected devices. However, Whirlpool believes that the definition of "reasonable security features" is overly vague and will be subject to much interpretation. Whirlpool supports the testimony of the Association of Home Appliance Manufacturers (AHAM), and agrees that the definition of "reasonable security features" must be amended to ensure that adherence to national consensus standards is an acceptable means for a manufacturer to meet statutory requirements.

As new technologies are introduced, Whirlpool must be able to respond to new cyber threats in the most effective way that protects the security of our consumers, using industry best practices. We do not know what future threats may look like, so national consensus standards are the most efficient and effective way to ensure consumer safety. Consensus standards are regularly revised as new technologies and threats emerge.

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

In our more than 107 year history, Whirlpool has been at the forefront of appliance innovation and we have proven our ability to evolve and adapt to emerging challenges. Today's appliances use a fraction of the energy and water as the appliances in consumers homes 20 years ago, while providing consumers with improved features and performance. Connected appliances are bringing even greater technology to consumers, with features such as smart hub integration, assisted cooking, and smart energy use.

Our company's mission is to "earn trust and create demand for our brands in a digital world." As the number one appliance manufacturer in the world, our company is committed to doing everything possible to keep data secure and to protect against cyber threats.

Thank you again for the opportunity to submit testimony. Please reach out if you have any questions, I am happy to discuss this matter further.