



## SUB·ZERO GROUP, INC.

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Via email

**Re:** Sub Zero Group, Inc. Comments on Oregon HB 2395, Security of Internet Connected Devices

The Sub Zero Group, Inc. (Sub Zero) respectfully submits the following comments to the Oregon Judiciary Committee regarding OR HB 2395 on the Security of Internet Connected Devices.

Sub-Zero is a family-owned company that has been headquartered in Madison, Wisconsin for over 70 years. Sub-Zero developed the niche market for customized built-in refrigerators, freezers and miscellaneous refrigeration (wine storage) products. We manufacture these, as well as Wolf high performance cooking products, in the U.S., in Wisconsin and in Arizona. While not technically meeting federal government definition of a small business, our company is significantly smaller than the major U.S. and international appliance manufacturers. The cost to meet and risk associated with both federal and state government requirements do not scale; our costs and risk per unit produced, including engineering and related expenses, are therefore significantly higher than most other manufacturers. That being said, it is extremely important to us that OR HR2395 be implemented correctly so that our business is not negatively impacted in the future.

We strongly urge you to amend the bill as written today and heed the recommendations from our trade association, Association of Home Appliance Manufacturers (AHAM), who strongly represents our recommendations for a successful bill on the seriousness of the security of internet-connected devices. It is urgently important that this bill incorporate consensus standards, just as the Consumer Product Safety Commission (CPSC) states as one of their own guiding principles. Sub Zero Group believes strongly in consensus standards because they engage all stakeholders and incorporate both logical and reasonable test procedures, metrics, and outcomes that serve manufacturers and the consumer's best interest.

I would invite anyone from the Committee to contact Sub Zero Group if there are any questions regarding this submittal. We thank you in advance for giving our request deep consideration as you ponder the impact of this bill.



Respectfully Submitted,

Christopher M. Jessup  
Corporate Quality Engineering & Compliance Manager