



## Consumer Federation of America

1620 I Street, N.W., Suite 200 \* Washington, DC 20006

June 23, 2021

Assembly Committee on Privacy and Consumer Protection  
Room 162, Legislative Office Building  
1020 N Street  
Sacramento, CA 95814

**Re: SB 346 Support**

Dear Committee Members:

Consumer Federation of America, an association of consumer organizations across the United States, including in California, supports SB 346, which would introduce much needed guardrails to restrict the exploitation of video recordings captured by in-vehicle cameras.

In particular, the bill would build on existing protections for voice recordings captured by in-vehicle microphones and extend those protections to video recordings captured by in-vehicle cameras. SB 346 would ensure that video recordings, as with voice recordings, cannot be sold or shared to third parties or used in advertising. It would require manufacturers to prominently inform, during the purchase of the vehicle, either the user or operator of the existence of any cameras, and additionally, would prevent manufacturers from embedding these features in a vehicle with the express purpose of allowing law enforcement or investigative officers to monitor communications.

A 2014 study by TomTom, a Dutch company that sells GPS devices and real time traffic data, cited research showing that in Los Angeles alone, consumers spend upwards of 90 hours per year driving to work.<sup>1</sup> According to a 2019 study by the AAA Foundation for Traffic Safety, nationally drivers are spending 8% more time in their vehicles since 2014.<sup>2</sup> As more and more manufacturers include in-vehicle cameras to monitor drivers and passengers during, for example, autonomous driving sessions, the protections SB 346 affords will become only more necessary.

While we have previously called for a private right of action to be added to the bill in order to ease the enforcement burden on an already thinly stretched, under-resourced Attorney General's office and enable consumers to enforce their rights, we support the legislation even without such a provision. We urge the committee to take favorable action on this measure.

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<sup>1</sup> Frizell, Sam. "L.A. Drivers Spend 90 Hours a Year Stuck in Traffic, Study Finds," *Time* online, June 4, 2014. <https://time.com/2821738/los-angeles-traffic-study/>

<sup>2</sup> Gross, Andrew. "Think You're In Your Car More? You're Right. Americans Spend 80 Billion Hours Behind the Wheel," *Newsroom AAA*, February 27, 2019. <https://newsroom.aaa.com/2019/02/think-youre-in-your-car-more-youre-right-americans-spend-70-billion-hours-behind-the-wheel/>

Sincerely,

A handwritten signature in black ink that reads "Susan Grant". The signature is written in a cursive, flowing style.

Susan Grant  
Director of Consumer Protection and Privacy  
Consumer Federation of America