

PUBLIC FORUM OF THE
CALIFORNIA CONSUMER PRIVACY ACTS

TRANSCRIBED BY: SHANNON D. DENNEY, CSR. No. 10385

1 MS. KIM: On behalf of the California
2 Department of Justice and Attorney General Xavier
3 Becerra, welcome to the seventh public forum on the
4 California Consumer Privacy Act.

5 We want to thank Stanford Law School for
6 hosting our forum today.

7 We are at the beginning of our rule making
8 process of the -- on the CCPA. And these forums are
9 part of the informal period where we want to hear from
10 you. There will be future opportunities where members
11 of the public can be heard, including once we draft a
12 text of the regulations and enter the formal rule
13 making process.

14 Today, our goal is to listen. We are not
15 able to answer questions or respond to comments.

16 Before we begin, we would like to briefly
17 introduce ourselves. My name is Lisa Kim. I'm a
18 Deputy Attorney General of the Privacy Unit, which is
19 in the Consumer Law Section of the AG's office.

20 MR. MAUNEY: And I'm Devin Mauney. I'm a
21 Deputy Attorney General in the Consumer Law section.

22 MR. BERTONI: And I'm Dan Bertoni. I'm a
23 researcher in the Attorney General's executive
24 office.

25 MS. KIM: So we will begin in just a moment,

1 but I wanted to go over a few process points before we
2 start.

3 Each speaker will have five minutes to speak.
4 A member of our staff is keeping time with these yellow
5 cards. And so we ask that you please be respectful of
6 the timekeeper, as well as your fellow speakers today.

7 We are also audio recording the forum today,
8 and will be transcribing the comments afterwards. So
9 please speak slowly and clearly.

10 As with the transcripts of the proceeding
11 forums, once they're available, they will be posted on
12 our CCPA website. These you Power Point slides are
13 also available on our website.

14 The front row here is reserved for speakers.
15 So when you come up to the microphone, it is requested
16 but not required that you identify yourselves when
17 you're offering your public comment. You may sit in
18 the front row so we can know who's about to speak, but
19 if you would like to just wait in your seat, that's
20 fine, too.

21 It would be helpful if you provide us a
22 business card if you are speaking. But again, it's not
23 required that you do so. And if you have a business
24 card, you can just leave it in the front of our table
25 right here.

1 We also welcome written comments by e-mail or
2 mail. Our deadline for submitting written comments is
3 this Friday. And the e-mail and mailing address is
4 listed up here on the slide.

5 Bathrooms are right behind us. The women's
6 restroom is right behind us, and the men's restroom is
7 on the first floor. And we will be taking some breaks
8 throughout the process today.

9 May I ask if there's any media present, if
10 they could please raise their hand. I don't see
11 anyone. Thank you.

12 So I just wanted to cover a little background
13 on the rule making process. The rule making process
14 discovered by the California Administrative Procedures
15 Act. During this process, the proposed regulations and
16 supporting documents will be reviewed by various state
17 agencies, including the Department of Finance, as well
18 as the Office of Administrative Law.

19 Right now, these public forums are part of
20 our initial preliminary activities. If you can make it
21 out on the screen, it's way at the very top of the red
22 arrow. This is the public's opportunity to speak to
23 what the regulations should address, and what they
24 should say. We strongly encourage the public to
25 provide oral and written comments, including any

1 proposed regulatory language, so that we can take that
2 into consideration as we draft the regulations.

3 Once this informal period ends, there will be
4 additional opportunities for the public to comment on
5 the regulations after proposed draft is published by
6 the Office of Administrative Law.

7 We anticipate starting the formal review
8 process, which is initiated by the filing of a Notice
9 of Proposed Regulatory Action in early fall of this
10 year.

11 The public hearings will take place during
12 the formal -- during the formal rule making process,
13 and they will be live webcasts, as well as videotaped.

14 All oral and written comments received during
15 the public hearings will be available online through
16 our CCPA web page. So if you would like to stay in
17 touch or informed throughout this process, this is our
18 website. www.oag.ca.gov/privacy/CCPA. You can also
19 sign up for our e-mail address at this web page.

20 Finally, the CCPA Section 1798.185 of the
21 Civil Code specifically identifies areas for rule
22 making responsibilities by the AG. The areas are
23 summarized here in sections one through seven, so
24 please keep these in mind when providing your comments
25 today. I'll go through them quickly.

1 Number one, should there be any additional
2 categories of personal information. Two, should the
3 definition of unique identifiers be updated. Three,
4 what exceptions should be established to comply with
5 state or federal law. Four, how should a consumer
6 submit a request to opt out of the sale of personal
7 information. And how should a business comply with the
8 consumers request. Five, what type of uniform opt out
9 logo or button should be developed to inform consumers
10 about the right to opt out. Six, what types of notices
11 and information should businesses be required to
12 provide, including those related to financial incentive
13 offerings. Seven, what can a consumer or their
14 agent -- I'm sorry. How can a consumer or their agent
15 submit a request for information to a business, and how
16 can the business reasonably verify these requests.

17 So at this time, we welcome comments from the
18 public. If speakers want to come down to the front
19 row, they're welcome to do so now or take the mike.
20 Thank you.

21 SPEAKER 1: My name is (inaudible) Preston
22 (inaudible) I'm with Common Sense Media, which is
23 (inaudible) of the law organization founded by teacher
24 here.

25 I just want to make a couple points to put

1 this law in context.

2 The CCPA is not a perfect law. No one has
3 every claimed it is, but it's been critically
4 significant law for a number of reasons. First, and
5 most importantly, this is probably the strongest
6 advance for children's rights (inaudible) since the
7 Children's Online Privacy Protection Act passed in
8 1998. When that passed in 1998, some of the biggest
9 (inaudible) on the internet included Geo Cities, AOL
10 (inaudible) digital experience like our kids be growing
11 up today with something we just didn't understand at
12 all about.

13 Some of the rights that kids have earned
14 under the California Consumer Protect Act is the right
15 to opt out or right to have an opt in to their sale of
16 their data by any tech companies for kids under 16, and
17 in the affirmative requirement that companies would
18 understand and not sell any data for kids under the age
19 of 13. So when these rights are enforceable in court.

20 And I just want to take a moment and reflect
21 on why these rights are so important. First of all, we
22 are research organization, Common Sense Media, 98
23 percent kids under the age of eight have access
24 (inaudible) devices of their own. 72 percent of teens
25 today believe that tech companies use techniques to

1 manipulate them keep them online. We know this is true
2 from the work with another Stanford graduate,
3 (inaudible) Harris, Center for Humane Technology, which
4 talks about the way many of the tech communities use
5 techniques with (inaudible) psychology. They look at
6 how to increase the attractiveness of sounds and
7 visions with the idea of getting kids into addictive
8 relationships with their technologies. No surprise, 56
9 percent of teens say they feel addicted to (inaudible)
10 cell phone, and 68 percent of teens say the negative
11 effect on their own generation.

12 Let's think about that for a second. There
13 are reams and reams of social science research about
14 how to sufficiently develop kids, the most effectively
15 developed kids in education and parenting sect. But if
16 kids are on media for nine hours a day, that's more
17 time than they're spending in schools, probably more
18 time than they're spending with their parents. And
19 (inaudible) conducted on them, almost no research about
20 what its affects are.

21 We know there are good things that come with
22 technology, but we also know bad things that come with
23 technology. So -- forgive me.

24 And in that vein, can you think of another
25 product that is so persuasive, so pervasive in our

1 lives, there's so many bad effects which mix in with
2 the good effects, and it such a crisis of public policy
3 and a crisis of circulation of government, as well as
4 crisis of ethics and crisis of morality that these
5 companies that are pushing it.

6 So let's celebrate the CCPA for what they do.
7 It's incredible step forward. It's an example of
8 democracy can work. We've overturned with this law
9 some of the most insidious (inaudible) effects of this
10 company has ever -- this country has ever seen.
11 Technology companies have spent billions of dollars
12 over the last 20 years to ensure there's almost no
13 regulations on their product. They been successful
14 with that. And no money (inaudible) self-regulation.
15 They been incredibly unsuccessful at that, despite a
16 litany of promises from every CEO that self-regulation
17 is the way to go.

18 We seen the result in the series of scams.
19 YouTube is pushing completely inappropriate (inaudible)
20 kids, content to kids through using kids. YouTube is
21 also enabling, according to reports, networks of
22 pedophiles who are commenting on YouTube kids' videos.
23 Uber, Facebook sold the data of 126 million Americans,
24 or (inaudible) allowed to access it and pump this
25 information into our political process. What's perhaps

1 the most worrisome example of propaganda I can think of
2 in recent times, Uber and Twitter are under
3 investigation by law enforcement for invasive trapping
4 of kids geo location in every piece of data kids have.

5 So the CCPA isn't perfect. But I ask this
6 member what it is. It's a cultural sea change. It's a
7 reflection by the California government that the system
8 that this industry is out of control, and that the
9 public wants immediate changes. Facebook (inaudible)
10 22 percent of Google (inaudible) that's less than half
11 or about half of president, who is hardly a popular
12 president.

13 So let's run around how important this is for
14 kids. (inaudible) you for every time when you urge
15 this law to be weakened, show your good faith by
16 suggesting a way it can be strengthened. Show your
17 good faith to users you really are trying protect.

18 In front of the DOJ staff, I want to thank
19 you for your time. You're in a very difficult
20 situation. Because as I mentioned, for 20 years, this
21 industry has developed, almost without regulation. So
22 you all are trying to have to pick up on that.

23 I will remind you, though, that the public is
24 behind you, even 59 percent tech workers are behind
25 you, and a clear legislative intent of this law was to

1 change the situation and get consumers, and especially
2 kids new rights.

3 So I hope you remember that. And I thank you
4 for your work.

5 SPEAKER TWO: Hi. I'm Eric (inaudible). I'm
6 a professor at (inaudible) University School of Law.

7 I do agree with the last speaker that the
8 CCPA isn't perfect (inaudible). I want to (inaudible)
9 emphasis, however, on digital companies and (inaudible)
10 data. As we all know, the law applies to off-lying
11 companies as well, and thousands of them, if not
12 millions, as well as to data that's non-electronic
13 form. I know you're working on recovery employees
14 cases of the law, not just how (inaudible).

15 I (inaudible) at the San Francisco
16 (inaudible) and I want to follow up on comments with a
17 procedural request that I learned since the passing of
18 (inaudible) that I think there's a lot of people who
19 are hoping that their office (inaudible) regulation,
20 that you won't be eliminated to playing in the sandbox
21 as defined by 1798.185. We obviously are (inaudible)
22 talk about that. We're hoping that they'll talk about
23 a lot of other things as well.

24 At the San Francisco hearings, I think you'll
25 recall, (inaudible) talked about that I think everyone

1 talked about something else. And there's a lot of
2 (inaudible) in the something else you might talk about
3 as well. (inaudible) to me is how your office and the
4 Legislature will divide the responsibility between the
5 Legislature superintending the tested law, and the AG's
6 office rules and will stand, clarify, and even
7 (inaudible). Everything that I have seen, the
8 Legislature respects the AG's office, will take the
9 full benefit (inaudible).

10 So I ask to you is I hope (inaudible) in the
11 regulation. There will be a target of wide range of
12 topics.

13 Next thing I'll say (inaudible)
14 responsibility. I'm not sure you (inaudible) so
15 thank you for the work that you're doing, thank you
16 especially for holding (inaudible) We appreciate the
17 hard work that you're doing (inaudible). Thank you.

18 SPEAKER THREE: Good afternoon. Thank you
19 for the opportunity to come. My name is Susan
20 (inaudible) I'm an attorney at (inaudible) certified US
21 and European Privacy Law.

22 The (inaudible) Law represents companies that
23 serve California consumers that are working to
24 (inaudible), to help them protect customers that are
25 customers and privacy.

1 I would like to suggest some rules of
2 clarification that could make it easier for companies
3 to comply with the California Consumer Privacy Act in a
4 way that protects the individuals.

5 The first rulings to verification of
6 consumers' right to access data. Many commenters have
7 discussed the potential risks associated with providing
8 consumers with access to data about all individuals who
9 are believed to be members of the same household.

10 Under your authority to make rules for related to
11 verification of a consumer's access requests, you may
12 wish to consider a rule that provides access to
13 household data only in cases where data is inherently
14 collected or stored in the household (inaudible). For
15 example, a database of household income, or record of
16 overall household utility usage might well be household
17 personal data.

18 For data to be broken down to the individual
19 level of individuals who live in the household or the
20 use of individual devices, no one individual should be
21 considered verified to gain access to data about other
22 individuals in a household. That limits some of the
23 security issues, privacy issues and dangers that are
24 otherwise inherent in the inclusion of household
25 information, in the definition, which clearly has

1 function, but with respect to access to right stuff
2 we'll ask security.

3 The next comment relates to verification
4 (inaudible) access to personal information as well.
5 Under your authority to promulgate rules to facilitate
6 business clients and verify the consumer requests to
7 access their information, it would be helpful to
8 clarify that device (inaudible) alone without other
9 personal information are not enough to verify the
10 consumer's identity. This would help businesses avoid
11 providing consumers information to bad actors making
12 fraudulent access requests. Businesses that have only
13 these device identifiers also shouldn't be obligated to
14 collect additional information to verify consumer's
15 requests for access to personal information.

16 And relating to the definition (inaudible)
17 identifiers, in certain online transaction, unique
18 identifiers are used and disposed for purely
19 operational purposes. But if you read certain of the
20 definitions together, that could lead you to the
21 counterintuitive conclusion that those transactions are
22 the sale of personal information under the CCPA.

23 Using your rule making authority to clarify
24 the definition (inaudible) identifiers in order to
25 overcome obstacles (inaudible) and your authority to

1 adopt additional regulations to further the goals of
2 the CCPA, you may want to consider clarifying that when
3 unique identifiers, such as IP addresses, are used for
4 purely operational purposes and not profiles, they're
5 not serving functionally as personal information, and
6 their disclosure should not constitute a sale of
7 personal information with the CCPA. Because as long as
8 all the parties that receive the identifiers are
9 prohibited from using them for other purposes,
10 regardless of what those parties do in other respects
11 for businesses.

12 But in that context (inaudible) prohibited
13 from using those identifiers for other purposes. The
14 identifier are not really functioning as personal
15 information and that shouldn't be a sale.

16 Thank you for the opportunity.

17 SPEAKER FOUR: Good afternoon. Thank you for
18 the opportunity to (inaudible) residence of California
19 and chief (inaudible) advertising technology company
20 called Comcast, which is based in San Francisco,
21 California.

22 We support the underlying (inaudible) of the
23 CCPA, including transparency, control and
24 accountability. In fact, self-regulatory (inaudible)
25 conduct principals that third-party advertising

1 companies, such as Comcast, (inaudible) were founded on
2 those principals, as well as the concepts, such as
3 (inaudible). The fact that many aspects of the CCPA
4 aligns with (inaudible) existing software guidelines is
5 a welcome attribute of the law, and something we hope
6 your office would take into consideration.

7 But there are some materials (inaudible)
8 remain ambiguous and open to a range of interpretation.
9 We ask your office to provide guidance and increased
10 certainty of (inaudible) in ways that advocates
11 (inaudible) existing privacy practices that are also
12 technologically feasible. It is our hope that your
13 office will clarify the scope of specific definitions
14 of the CCPA and how it intends (inaudible).

15 Specifically, we ask that your office provides guidance
16 and clarification on the definitions on the personal
17 information, and sale that are included in the law.
18 These definitions are very broad and ambiguous as they
19 are (inaudible) address the important nuances
20 (inaudible).

21 In particular, we ask that your office issue
22 guidance on a different types of data, including
23 definition (inaudible) including emphasis on the
24 importance and value of (inaudible) instead of
25 (inaudible) identifiable (inaudible.)

1 For example, the interpretation of the
2 definition of personal information is general, and it
3 gives many different types of data on this (inaudible).
4 But not all data included in that definition are the
5 same. The range (inaudible) personal information
6 definition is broad (inaudible) everything from
7 remaining on Social Security number to (inaudible)
8 generate (inaudible). There are dramatically different
9 risk profiles associated with various types of data
10 included in that definition. Distinguishing between
11 the use of information and being directory tied to a
12 person without enough data with (inaudible) information
13 that is intentionally obfuscated and (inaudible) other
14 information that tied that person that (inaudible) is
15 very important. Acknowledging this (inaudible)
16 encourage to choose to work (inaudible) information.
17 Instead of information that is personally identifiable,
18 this directly benefits the right to privacy that was
19 given to you in California Constitution.

20 Similarly, the definition of "sale"
21 (inaudible) different digital companies communicate
22 with one another that are actually transact business.
23 For example, as defined, sale (inaudible) includes the
24 exchange of information and it is not the subject of
25 the transaction. In market places that serve

1 (inaudible) which supports the (inaudible) data is
2 often (inaudible) transaction, even when it is not the
3 subject, it is merely (inaudible).

4 Thus, current definition (inaudible) while
5 there is an exception provided for certain (inaudible)
6 we do not believe that fully captures the way in which
7 advertisers, and websites (inaudible). We also do not
8 believe it is intentional drafters (inaudible).

9 So guidance provided by your office will be
10 helpful to assist the marketplace to better understand
11 how to properly (inaudible). Thank you for your
12 attention and look forward to guidance from your office
13 (inaudible) and aspects of the law, (inaudible).

14 MR. MAUNEY: Once speakers have already gone
15 to the mike, you can leave the seats down in reserve
16 area for those (inaudible) that would be great.

17 SPEAKER FIVE: So my name is (inaudible)
18 Silverstone (inaudible) consultancy called (inaudible)
19 I had the pleasure of being both in California
20 (inaudible). Therefore, I'm subject of your
21 (inaudible) both and (inaudible) unbelievable that they
22 exist in the United States regarding privacy.

23 I want to start by say thank you. This is a
24 huge step forward and because of the economy of the
25 State of California, and (inaudible) six states are

1 virtually hoping this law, and three other states
2 adopting the law, and for the first time, we may get
3 the point trying to see that is perhaps in the
4 (inaudible) of the United States.

5 I want to talk first and mention some numbers
6 from CCPR. These are raw numbers. They are very
7 (inaudible). I would like for you to think what those
8 numbers mean (inaudible) for roughly around December of
9 2020. I will then talk about my experience as a
10 European. We (inaudible) complete the subject. And
11 finally, I would like to make a few suggestions
12 (inaudible) process, et cetera and to cite the
13 amendments currently under discussion.

14 I also (inaudible) CIPT and CIPM. I am
15 (inaudible) chief security officer for companies such
16 as Expedia, (inaudible) vice president of security and
17 privacy (inaudible).

18 So start with the numbers. So I think it is
19 very -- in the December 2018, there have been roughly
20 registered 60,000 complaints across Europe provided
21 nation (inaudible). Most of these were given by stated
22 subjects of all. And if you are wondering what the
23 average would be, it will be about 2,200 country,
24 because some countries Europe don't have 2,000 people,
25 but that's the average.

1 Since then, in (inaudible) saying due to the
2 fact (inaudible) end of the year, the current count is
3 over 100,000 complaints under process. That's an
4 average of 3,600. The biggest (inaudible) of
5 complaints have been number one, CCPT abuse of visual
6 imagery, specifically in parts of Europe, you are
7 pretty much disallowed to (inaudible) your employees
8 use CCPT, unless there's a whole list of "unless".

9 And even picture the student ID card for the
10 purpose of identification in an office might very well
11 be restricted under the GDPR (inaudible) gender,
12 religion sometimes, race, national origin, et cetera.

13 Number two, the gentleman (inaudible). The
14 number two category for complaints, marketing poles.

15 And three category (inaudible), marketing
16 e-mails. We're talking together about 100,000
17 complaints that we'll see the space of roughly six
18 months for the population of Europe, which is
19 comparable to the population of the United States. It
20 mention what the big percentage the US population in
21 California represents.

22 (Inaudible), which this law touches on, under
23 the GDPR rule to announce notifications of possible or
24 confirmed purchase (inaudible) 41,000 notifications of
25 the regulators in the six months and (inaudible),

1 41,000 breaches, those 41,000 records. So we know how
2 bad the situation is. Where as a year ago, people
3 (inaudible) say certain.

4 And finally, (inaudible) authority in Europe
5 (inaudible) average two investigations by themselves
6 per country. But there are over 200 investigations in
7 addition that were created by complaints. This roughly
8 seven and a half percent. (inaudible) Thank you.

9 SPEAKER SIX: My name is (inaudible) counsel
10 of a need to be internet company called (inaudible)
11 communications.

12 And you know, I echo what everybody else has
13 said (inaudible) important but, I hope that the office
14 can take into account that the digital echosystem has
15 many, many layers. And they're making one company up
16 at the top, the Google, the Facebook, the Pay Pal,
17 whoever, that deals with the consumer, there could be
18 other 10 others behind that company that are assisting
19 that company in providing service to the consumer. And
20 the bill only addresses this top layer (inaudible)
21 consumer. But we are providing services to companies
22 who do.

23 And so we're uncertain what our obligations
24 are. And don't think it's fair for a lot of
25 (inaudible) these a huge (inaudible) of California

1 businesses uncertain of what their obligations are. We
2 have spent the last two years trying to figure out our
3 obligation under the law that actually does distinguish
4 between a consumer-based companies and everybody else.
5 The GDPR makes a really clear distinction between data
6 controllers, those are the ones who determine the
7 purposes of information be collected for purposes of
8 processing, et cetera. They're the ones who
9 (inaudible) consent from the consumers for collection
10 of certain data and the processing of data, and then
11 they can share that data with data processors as
12 necessary to count the service performed.

13 And it's pretty clear that that's not the
14 sale. Is it a sale if we give them the information
15 (inaudible) web service (inaudible)? I don't know. Is
16 it a sale if our customer gives us data to process in
17 our analytic platform (inaudible) serve back up to them
18 for their internal business services? We're making no
19 money off of it, other than providing service.

20 So I'm going to encourage the office to think
21 about this really critical distinction between the
22 consumer casing in businesses and everybody else and
23 what their respective obligations are, you know. And
24 (inaudible) pretty clear, we also have a lot of time to
25 figure out. We have to serve up data processing

1 addendums to our customers who say, we will only
2 process data per the, you know, purposes of you tell us
3 to process it for. But, here's the people you have to
4 go get consent from the consumer, not us.

5 We have no way of putting opt out button on
6 our website. We don't know who consumers are. They're
7 unknown to us. We have no relationship to them. We
8 tell our customers, you know, it could be a bad by
9 price by design if you can even give us that
10 information, you don't have to. And so there are a lot
11 of new ideas out there that could be used to help
12 California businesses understand what they're supposed
13 to do.

14 And lastly, I think the law is missing a core
15 concept which is consent. The GDPR law as it is, at
16 least, you know, says, hey, companies. If you're going
17 to collect data from somebody to provide a service, why
18 don't you tell them what you're collecting, the
19 purposes for which you are using data, and who you're
20 going to share it with. And so we have all spent two
21 years grappling agreements that spell each of those
22 out. You know, I reviewed a customer, the consent that
23 they give to their customer to make sure they
24 appropriate describe the data that we need them to
25 collect so that we can provide the service to them.

1 And it's all really helpful and useful stuff.

2 You know, I don't know how you can avoid
3 adopting some regulation that deal with this
4 distinction between controllers and processors
5 (inaudible) if a question comes up, and an enforcement
6 action what's the court going do, we have -- how are
7 they supposed to interpret, other than by going and
8 looking (inaudible) which is place they can tag to to
9 really understand what the difference, you know, the
10 different obligations of the problem solvers.

11 So I don't envy your jobs, but I hope you can
12 help the bottom layers end the difficulty (inaudible)
13 what their obligations to, their customers and to the
14 ultimate consumers. Thank you.

15 SPEAKER SEVEN: My name is (inaudible). I'm
16 not a law student, I'm a regular citizen. So some of
17 the legalese (inaudible). But I wanted to come here
18 today and say first of all, thank you for (inaudible)
19 that would protect our rights for privacy, especially
20 on my end (inaudible), seeing what happened with the
21 most recent election, data being stolen and used by
22 foreign governments (inaudible).

23 I -- my family also grew up in an eastern
24 country with communism, so we know the importance of
25 privacy. Their phones were hacked by (inaudible)

1 underground for the actual news. So my family does
2 know the very important nature of this.

3 But I also wanted to say I have this personal
4 experience with privacy being breached where I was
5 e-mailed by a current password (inaudible) password and
6 the person e-mailing five (inaudible) saying they had
7 videotaped my (inaudible) website, all my contacts.
8 Because it was a real password that they had, I took it
9 seriously. And although it was a scam, it was of the
10 different nature of scam, because they actually did
11 have some personal information. So whether that was by
12 some website that I visited, and was not able to opt
13 out of having third party sell my information, or a
14 contact in an application that I had like a friend on
15 Facebook, who by being their friend and visiting on
16 other sites (inaudible) information.

17 I want to say thank you for doing something
18 about this issue. And I also wanted to request an opt
19 in version so that you are already opted out of any
20 kind of selling of personal information on a site that
21 you go to, and something that is very easily and
22 quickly read understandable, rather than a very long,
23 legalese document that (inaudible) privacy section,
24 which most people might skip over, (inaudible)

25 SPEAKER EIGHT: (inaudible) perspective chief

1 complaints officer (inaudible). We are (inaudible) in
2 service business very seriously. And (inaudible) group
3 today about how to clarify definitions and processes so
4 we can continue to be in compliance and serious about
5 practice. We have (inaudible) \$30,000 across Northern
6 California (inaudible) and seriously. But now we have
7 very general rules to try and to capture a lot of
8 (inaudible) information (inaudible) specific so we can
9 do right by our members, as well as non-members who
10 come to us (inaudible) as well.

11 In particular, we have what I refer to
12 (inaudible) language. There is a large (inaudible)
13 September position that were made (inaudible) saying
14 that data is collected under (inaudible) or California
15 (inaudible) that it is already protected under existing
16 privacy laws, then this is exempted from of this
17 (inaudible) new law.

18 Well, an awful lot of (inaudible) because
19 we're in (inaudible) service has to do those things.
20 All of our vendors that we share our data in order to
21 accomplish transactions, all have the highest standards
22 (inaudible) due diligence make sure that they're not
23 going to breach the data (inaudible) understand
24 confidentiality (inaudible) already.

25 So now we have a member comes to us and

1 knocks on our door come January 1st, 2020 and says,
2 show me all the data you have on me. And we said,
3 well, actually, all the data we have on you (inaudible)
4 show you anything now. That's not going to go over
5 well. So we need proper language indicating rules that
6 tell us what is it we can tell people about how
7 (inaudible) and what their rights are or are not, in
8 addition to those rules in the new law.

9 That also is pretty much a theme (inaudible)
10 talk about today is just give us specifics about how we
11 can respond and how we can (inaudible) to stay
12 compliant. There are a lot of different areas that
13 touches on, including (inaudible) requests we have
14 Department of Homeland Security telling us we have to
15 keep data in perpetuity now because they want to be
16 able to track, you know, bad guys.

17 So how can we get rid of data if we're not
18 using it anymore (inaudible) keep this information to
19 try to find bad guys? So (inaudible) specifics in here
20 (inaudible) 1798.110, 1798.115 talk about data
21 collected (inaudible). But it doesn't talk about
22 how -- let me just go down the list here real quickly.

23 All right. So the information we shared with
24 our service providers. We'll talk about service
25 providers and our obligation. And some advice

1 (inaudible) service providers as sharing they're
2 handling safely, we want to make sure that information
3 security (inaudible) satisfies what this nuance says to
4 ensure the information stays secure. Are we already
5 doing enough (inaudible) set the standard (inaudible)
6 today have been breaching by lots of different
7 organizations (inaudible) everybody has had a say in
8 how to establish industry standards. And that's what
9 we follow. And we need to know whether or not this law
10 is going change those standards or not. Again, because
11 we want to do the right thing. We just need to know
12 how.

13 As to the issue of non-identified
14 information, IP addresses, cookies, (inaudible) of
15 information that we come across as people comply to
16 (inaudible) actually finish their applications, or we
17 don't actually give them a loan (inaudible)
18 information.

19 A lot of times, we don't know who these
20 people are. Somebody who's knocking on your door says,
21 I'm showing you everything you got on me, great.
22 (inaudible) How am I supposed to go find all this
23 (inaudible) information (inaudible) IP addresses. From
24 a practical standpoint, how are we supposed to know who
25 these people are if that is the only information we

1 have on them? This law talks about (inaudible) other
2 laws, other data (inaudible) into personally
3 identifiable information, great. (inaudible) You're
4 not going to make us go out and turn it into
5 (inaudible) already, so we need to know, are we liable
6 for that information or not?

7 There are other categories also, but not as
8 important as things like the names and addresses of
9 people who spend contracts with us. Are they
10 consumers? Do we have to do give all the information
11 to them? (inaudible)

12 Essentially, our ask is, give us scenarios
13 specific so we can -- give us rules to follow that we
14 can do the right thing in situations we actually
15 encounter when somebody comes and knocks on our door
16 and asks for information.

17 Thank you for your hard work. We look
18 forward to seeing (inaudible).

19 MS. KIM: If we can have everyone go for the
20 first time first, and if there's time (inaudible)
21 Thank you.

22 SPEAKER NINE: I'm Paige Barkley (phonetic).
23 I'm an industry analyst in (inaudible) where research
24 (inaudible) practices. And I over the last three
25 years, I've had a very strong focus on data privacy,

1 and data privacy communication. So in the regular
2 course of my work, I work with a lot of software
3 providers that either offer these types of solutions
4 and also work with companies that are trying to
5 implement practices.

6 So I think the main point I want to give
7 today most important for this audience is to
8 (inaudible). And I think the myth that's pervasive
9 (inaudible) is that data privacy (inaudible) regulation
10 somehow (inaudible).

11 And I strongly believe from my research and
12 my line of work, that this is actually (inaudible)
13 data privacy practices and giving controls to consumer
14 when implemented correctly is not (inaudible). We talk
15 about the new data era, how data is the new oil. It's
16 the new currency. It's a business' most valuable
17 resource and asset. (Inaudible) this is data been
18 collected and controls in the pervasive business
19 (inaudible) data is good, old data must even be better.
20 So therefore, (inaudible) you have a philosophy that
21 collect and analyze as much data as possible, no matter
22 who it belongs to or where it came from, you can keep
23 it forever (inaudible).

24 But if you look at regulations by CCPA,
25 (inaudible) or data regulation, there's a common

1 business requirement underlying that. And when you
2 strip down these regulations, they're (inaudible) that
3 corporate environment is that you have absolutely
4 granular control of the data within your organization.

5 And what businesses came to realize is that
6 if you have this absolute control of your information,
7 there are numerous other (inaudible) benefits for your
8 business. In the data driven economy, when you're
9 trying to leverage information and use data to its
10 maximum value, when you have that control of
11 information, it has numerous other benefits. So you
12 need to be able to continually find personal data
13 associated with proper identity (inaudible) to retrieve
14 it or modify it as necessary. So that complete
15 granular control of data benefits the business
16 (inaudible) cases.

17 So if you look at proactive (inaudible)
18 enterprise like analytics, business intelligence, they
19 all cannot (inaudible) control of data that is
20 required.

21 So with strongly hold data, business can
22 agree to overall quality rather than quantity of your
23 data. So if you give consumers control and data
24 privacy, they may decide to opt out of certain data
25 sharing collection, the data they do provide needs to

1 be more (inaudible).

2 With stronger data control, you increase
3 security and (inaudible) over time. Because it
4 controlled require privacy (inaudible) control required
5 to security breach, and their eventual PR impacts are
6 incredibly expensive (inaudible) as a business.

7 With strong data control, you also have the
8 opportunity to build trust and long-term profitable
9 relationships with consumer (inaudible). Trusting
10 relationships result in a longer lifetime spent with
11 the business. So when you have trust and consumer
12 (inaudible) to be done, they ultimately spend more over
13 time (inaudible).

14 And finally, (inaudible) data access within
15 an organization. So if initiative such as self-service
16 analytics, (inaudible) able your internal knowledge
17 workers to access and use data, the strong data
18 (inaudible) allow you to very granularly control who
19 has access and what and when and why. So the business'
20 ability to control data will determine business'
21 ability to innovate and adapt (inaudible) economic
22 system and data (inaudible).

23 Data privacy regulation is forcing
24 (inaudible) organization (inaudible) reconsider
25 (inaudible) fundamental data (inaudible) practices.

1 And this a very positive thing. With regulations, such
2 as GDPR that finally cause many businesses to actually
3 have the funding (inaudible) to go and reconsider
4 (inaudible). This is a good thing for both businesses
5 and consumers, result in improvement business
6 efficiency and improve customer (inaudible) over time.

7 So in conclusion, in the absence of federal
8 data privacy legislation currently, California has the
9 opportunity to set an example. And it is my request
10 this law not be watered down and cannot be weakened.
11 With the California's (inaudible) population and fifth
12 largest economy in the world, we have the chance to set
13 an example. Others are going to follow that. So we
14 weaken that law, we reduce those consumer rights. That
15 would be the example they follow.

16 SPEAKER TEN: My name is Mary Stone Ross
17 (phonetic). I was one of the original proponents of
18 the initiative that became the CCPA, and formally
19 president of California (inaudible) I am no longer
20 part of that group, however, my comments today are my
21 own.

22 I'm here to today to remind Attorney General
23 Becerra and his office of our original intent in firing
24 the initiative: To give all Californian's meaningful
25 transparency into (inaudible) personal information

1 businesses are selecting about them in their devices.
2 And unlike current privacy laws, be sure that the law
3 be enforced.

4 As you are aware, the right to privacy is a
5 fundamental right protected by the California
6 Constitution. And the state has an interest in
7 protecting the privacy rights of its citizens.

8 Today businesses can state their policies in
9 vague terms, change them more or less at will, and
10 offer very little, if any, privacy protection to
11 consumers. The CCPA will change this. A shift the
12 balance of (inaudible) towards consumer. But there are
13 ways that your office made the protection even
14 stronger.

15 Transparency. The right to know what CCPA is
16 the cornerstone of the higher law. A consumer can only
17 believe (inaudible) collection and sale of personal
18 information if they understand what information is
19 being collected. For example, if a flashlight ap
20 (inaudible) location, that information must be
21 disclosed up front. (inaudible) the burden on
22 consumers to make a verifiable request (inaudible).

23 And even if there two standards of verifiable
24 requests. One, is the consumer is only requesting the
25 (inaudible) worries of the information of business

1 collecting. And second higher standard as a consumer
2 is requesting the specific pieces of personal
3 information. It should be as easy as possible for a
4 consumer to request in categories (inaudible). It
5 should also be legally clear a consumer can exercise
6 the right to know categories of personal information
7 (inaudible) specific (inaudible).

8 From a consumer privacy standpoint, it does
9 make sense to have a much higher standard of verifiable
10 request if a consumer is requesting (inaudible) of
11 personal information. Many businesses that do not have
12 a direct relationship with consumer still collect the
13 consumer's personal information, the consumer should be
14 allowed to offer a third party, including a non-profit
15 or another business to opt out of the sale of their
16 personal information on -- definition is critical.

17 I agree with some of the criticisms of the
18 CCPA that "household" is a vague and undefined term.
19 However, it is necessary that consumers be allowed to
20 find out what personal information a business collects
21 about your devices. Things, for example, my cell phone
22 and watch travel with me everywhere. And from a data
23 collection standpoint are essentially leading. I
24 advise the definition of personal information is
25 changed (inaudible) household and go back to the

1 original records of individuals who (inaudible).

2 We wanted to create a living law and the
3 updated technology has changed. The lack of which
4 (inaudible) past regulations. There is, therefore, a
5 thoughtful burden on the AG's office to continuously
6 add to categories of personal information. For
7 starters, I would advise (inaudible) information is
8 added back into the categories of personal information
9 as defined by the initiative. As evidenced by
10 (inaudible) there's clearly -- just as clearly a
11 category that consumers condone.

12 Enforcement is key. I agree with concerns
13 raised by your office, the Attorney General alone is
14 not in the position to be the sole enforcer of
15 (inaudible) acts. I encourage your office to work with
16 Sacramento to allow, like the original initiative,
17 enforcement by any district attorney or by any county
18 counsel, city attorney or city prosecutor whose city or
19 county meets certain population thresholds.
20 (inaudible) non-discrimination provision is a mess and
21 effect is non-discrimination provisions.

22 I encourage your office to work with
23 Sacramento and come up with guidelines on when a
24 consumer can sell their personal information. The
25 understanding of privacy is not a commodity that only

1 the wealthy should be able to afford. Consumers are in
2 a position of relative, and with some respect, the
3 technologies and (inaudible) we use. Businesses have
4 considerable expertise (inaudible) about the value
5 (inaudible) data. Therefore, in order for the consumer
6 to give meaningful consent, the business should have
7 the burden to clearly define the value provided to the
8 business by the consumer data.

9 Finally, I want to remind all interested
10 parties that privacy is good for business. When we
11 drafted the initiative, we wanted to encourage
12 businesses to comply. One of the reasons why we
13 decided not to regulate the reflection of personal
14 information as this, too, is a way for consumers. I
15 urge you to make your guidelines as clear as possible
16 to ease the burden of the mind. Thank you.

17 SPEAKER 11: Hi everyone. I'm here
18 (inaudible) I'm also a long-time (inaudible) privacy
19 management and (inaudible).

20 My understanding about how (inaudible)
21 regulated industry (inaudible) how (inaudible) works,
22 (inaudible). So for example, the CCPA counsel
23 (inaudible) sale of data.

24 What you should know is that most people in
25 most companies (inaudible) trading to the other

1 (inaudible), they're exchanging it, they are providing
2 it for the sake of (inaudible). And as you know,
3 (inaudible) CCPA (inaudible) from the sale. So I don't
4 think the CCPA as we know it today is going to have
5 much impact on the (inaudible) industry, they don't
6 think the consumers have that much choice (inaudible).
7 So I will simply just want to encourage you to
8 understand how that works (inaudible) for more than
9 happy to (inaudible).

10 SPEAKER 12: Hello. Thank you for the
11 opportunity to speak. (inaudible) My name is John
12 Lewis (phonetic), (inaudible) before computers and
13 finding people who don't want to be found, which is a
14 (inaudible). Basically, we work with different
15 financial institutions to help them be compliant in
16 ways to be able to help consumers.

17 When a consumer gets scared, they go in
18 hiding. They don't want to talk to people. The only
19 way to help them is to reach them and get in touch with
20 them, offer solutions you have to financial
21 substitutions. Part that process is (inaudible).
22 They're not answering their phone or returning calls,
23 then typically what you're doing is you're gathering
24 data on them from other data providers to try to be
25 able to say, maybe they moved and didn't tell me and

1 there's a new phone number for them that I go back
2 somebody else has, they can help me get in touch with
3 them. That's the process that (inaudible).

4 I think the intent of the law is great. I
5 think it's well intended. I think it's smart, and I
6 think it's a law that's needed to improve some of the
7 manual processes that are in place right now. But
8 frankly, I know this because I was there when we used
9 to use phone books and microfiche and criss-cross with
10 books to gather data on, find people right of the
11 courthouse. That was how you gathered information by
12 people. Now you push a button and you got more data
13 than drinking water through a fire hose. There's so
14 much data available that it's overwhelming. And it's a
15 broken process how it's gathered. And I think that
16 there are opportunities with technology standpoint, and
17 I know that, I spent the last 12 years doing it, there
18 are opportunities from a technology standpoint to be
19 able to put a process in place we can add structure to
20 unstructured data.

21 Specifically, debt collection. Specifically,
22 from skip tracing and add structure in regard how
23 companies can gather, organize and track all this data
24 in a more organized matter. So somebody asked me what
25 data do you have on me, I push a button, here it is.

1 (inaudible), here it is. You want to delete it? No
2 problem. Maybe you don't want to delete it because you
3 need it because you have to keep it because in case
4 there is some type of a reason you need that data to
5 show why you used it to say respectfully, I used this
6 data to never call you back, here's the data, I have
7 it, it's safe, it's secure. That's the way that needs
8 to be done, and that's not the way it's currently done
9 in our industry.

10 So when I saw this law, I thought this law
11 was phenomenal. I think there's opportunity
12 (inaudible) complex, complicated. Because there's so
13 many different systems and so many different ways to
14 (inaudible) around. It's like the wild, wild west.
15 Frankly, it's a little scary.

16 I think this is an opportunity for stronger
17 guidelines (inaudible) how the data is housed, after
18 it's sold or shared to ensure the data is always held a
19 security platform that we see in industry standards.
20 As you said today, there's industry standards,
21 (inaudible) guidelines, you just want to know the rules
22 are. The rules need to be clarified to understand,
23 hey, this law is great, but I need time to be able to
24 do it (inaudible) does what meaning everything you're
25 touching right now is in play starting January 1st,

1 2020? Those are the questions we need answered.

2 We're also hoping that the law makers
3 specifically can clarify, for our industry anyway, GOP
4 exemption. I just went a two-week tour with some of
5 the biggest banks in the country, and a lot of them
6 haven't even heard of this law, let alone understand
7 really what the implications are, what it means.

8 So for example, if a California consumer
9 asked a banker or vendor of the bank what data they
10 have on them, the bank or the vendor need to share what
11 data they gathered on the customer there, or the
12 example having to disclose this information, also.

13 And there's clarification that's also needed
14 in the outbound language, how can the CCPA apply data
15 gathered on consumers who are not the bank? We're
16 looking to somebody, you may pull a report on thousands
17 other California consumers on that report. It's all
18 trackable if you're using a system that can track it.
19 But the question is, is this law in play when it
20 applies to that?

21 So I think that's just a lot of opportunity
22 (inaudible) people in the weeks to understand data and
23 to understand what's happening to be able to give you
24 guys the clarification how a widespread and
25 far-reaching law like this can actually be used for the

1 benefit of what we all want anyway, which is our own
2 data privacy. Thank you again. Appreciate the effort.

3 SPEAKER 13: Hi everyone. My name is Tracy
4 (inaudible). We're a Northern California democratic
5 communication.

6 I just want to know because this is the
7 second CCPA forum that I attended. Compared to the
8 first one in San Francisco, I just want to sort of
9 compliment you, this room, in terms of it being far
10 more diverse crowd, far more well-thought out
11 perspective. As this process is moving on, I think we
12 are seeing some improvements, which are good to see.

13 I'm not going to completely reiterate the
14 comments that I made in San Francisco, but that would
15 be boring, A, you already have them. And I (inaudible)

16 I do want to sort of reiterate with all of
17 the people that are here, with the improvement in
18 diversity, there's still somewhat absent or missing the
19 public, the consumers, what I would call the unrelated
20 parties that don't handle data for a living, that are
21 in privacy professional, but they're simply on the user
22 side of the (inaudible) I haven't seen too many
23 comments here from those folks. So to an extent, I'm
24 going to try to channel some of that because I think
25 it's really, really important that this law work for

1 the people that are on the users side, and not
2 (inaudible) or the businesses that would be regulated
3 by it, although that is also important. But it can't
4 be sorted a one-sided conversation where essentially
5 the nature of the regulation (inaudible) filled out by
6 others who are being regulated by it, because we have
7 seen (inaudible).

8 So in terms of sort of consumers, I think
9 whatever gives people a right, it's important that
10 there not be any penalties inherent or connected with
11 that right. We give people the right to vote. We
12 don't want it to be accompanied (inaudible) or the idea
13 if you show up, someone is going (inaudible) in the
14 head, which of course has happened.

15 So when we're giving people the right to opt
16 out, that right should be as free and as unfettered as
17 possible. So when they look at what my colleagues
18 describe as the non-discrimination (inaudible) in the
19 current version of CCPA, what we see is that I could
20 pay a less (inaudible), we see that I could (inaudible)
21 or a service could be (inaudible) in some way.
22 (inaudible) should value my data which is a squishy
23 term what we're not entirely sure what it means. But
24 essentially there is, you know, there's potentially a
25 price for the exercising of the right (inaudible). And

1 of course, I may chose to exercise the right with one
2 company that breaks me out, or I may make a decision to
3 implement it over and over and over again, any number
4 of companies that I think (inaudible) impacted by. And
5 accumulated (inaudible) over and over and over again is
6 what we would call potentially a chilling (inaudible).

7 I think it's important that you sort of take
8 a look how is this law going to sort of land on the
9 heads of the people that it is supposed to be helping.
10 Because there is much of a safe holder as all of the
11 companies that are here.

12 SPEAKER 14: Good afternoon. Grand
13 (inaudible) from Dallas, Texas. And I work for a large
14 company here today and consult business on the side.

15 What's relevant to that why I bring that up
16 there are several companies relocating to North Texas,
17 as well as Texas (inaudible). As part of their
18 (inaudible) a lot of their employees are retreating to
19 rent in Texas to stay, just (inaudible). So what's
20 happening is a lot of small businesses in states like
21 Texas are now basically availing themselves (inaudible)
22 rules they have to follow. The problem is in Texas,
23 what we consider as reasonable security and people's
24 privacy is quite different than what reasonable
25 privacy, reasonable security in Texas.

1 So (inaudible), you have to understand what
2 exactly is reasonable security with respect to CCPA
3 (inaudible) in California versus those in other states.

4 I believe (inaudible) commerce because as you
5 know, today there are now is letting commerce
6 (inaudible) United States in the world. And also,
7 those moving to Texas (inaudible). So (inaudible)
8 adopting this, provide clear guidance, if you will, to
9 what is considered reasonable security and reasonable
10 privacy practices. That would be a great and
11 beneficial to all of us having (inaudible). Thank you.

12 SPEAKER 15: My name is (inaudible) vice
13 chair (inaudible) consumer privacy. This is the
14 organization that all by the initiative, the Consumer
15 Privacy Act with over 700,000 signatures and telephone
16 which lead to the Legislature passing what we see, are
17 discussing here today.

18 As a co-author of the CCPA, one of the
19 (inaudible) comments on these two areas (inaudible)
20 verification on consumer request, will certainly
21 verification and consumer request, and specifically
22 (inaudible). And we define whole pages any page
23 collecting info. So unless there's some confusion
24 around that, it's our belief that we don't think the
25 law really deviates from this as written, that it

1 really is any page that's collecting (inaudible) stops
2 the home page as defined more broadly. In the
3 community, it's actually (inaudible) defined that
4 actually collects information.

5 We think this is important because, again,
6 being able to opt out and be able to do the right to do
7 should be known, should be able to access it and do it.

8 One last thing before just (inaudible) we are
9 concerned about reports from Europe that large social
10 media companies with the relationship with the consumer
11 are taking steps (inaudible) allows them to be,
12 quote-unquote, co-first parties. When a consumer
13 visits a site, even though any rational consumer would
14 only think they were interacting with the site they
15 were on. So let's assume the consumer goes to a
16 fictitious site called Newspaper.com, and thinks it
17 achieves only Newspaper.com website, but actually
18 Search.com, another fictitious site, and
19 Socialmedia.com have sent cookies on Newspaper.com, and
20 suddenly are treating the consumer as their own
21 consumer. And so everything the consumer is doing on
22 Newspaper.com is (inaudible) Socialmedia.com. That's
23 clearly not the intention of GDPR from our perspective.
24 And we hope the Attorney General's will assure that's
25 not allowed under CCPA, that type of thinking.

1 So finally, Section 185 B is the reason why
2 we're here today. When we crafted this law, we had the
3 choice to make in terms of whom we thought (inaudible)
4 regulations. We're happy we chose the Attorney
5 General's office. We think they're in the best
6 position to move quickly, judiciously, and all the
7 information necessary to make these regulations as
8 appropriate as possible.

9 Finally, I have just (inaudible) point.
10 Before we cut the deal with the Legislature, we did a
11 pole on CCPA. This is where sometime in June of last
12 year, this thing polled at 81 percent. So since then,
13 there has been a lot of changes in the industry that I
14 think actually make that poll even higher. So I
15 encourage all of you embrace CCPA, good for business
16 good for consumers, move forward to enhancing the
17 rights to consumers (inaudible). Thank you very much.

18 SPEAKER 16: Good afternoon. My name is
19 George (inaudible) in the state of California.

20 (inaudible) CCPA, as well as profit of the
21 privacy section (inaudible), I, (inaudible) security
22 scientist (inaudible) member for some of the internet
23 service content, who were still businessmen or law of
24 fundamentals (inaudible).

25 I'm also recipient of global IP (inaudible)

1 pioneer award (inaudible) wireless (inaudible)
2 publication and internet security standards (inaudible)
3 generation wired and wireless internet technologies,
4 including the collaborative (inaudible) networks
5 (inaudible) Dr. Larry Roberts and Jim Valance.

6 I've also dedicated my life to setting
7 standards in technology, privacy and cyber security.
8 My path emerged after I lost my wife, (inaudible) to
9 breast cancer where I was grieving with other widowers
10 who had their deceased wife's privacy data stolen while
11 settling their estates.

12 Thus, I take the complications and technical
13 matters related to any law of data collection
14 (inaudible) monitoring the privacy data to heart. I
15 will love to (inaudible) elements for privacy
16 identification based on IP and geo location identifiers
17 (inaudible) legislation that present a masking false
18 positive, (inaudible) probable for consumers,
19 businesses, service providers and organizations in
20 general, required to monitor and (inaudible)
21 enforcement of defense of privacy (inaudible).

22 First, public IP addressing can be mapped or
23 changed (inaudible) tunnels dynamically services and
24 other virtual privacy methods that present enforcement
25 challenges for a consumer pursuing their privacy

1 rights, or for a business defending their privacy
2 protection position.

3 We suggest that IP addressing as a unique
4 identifier be enhanced or replaced with a different IP
5 infrastructure (inaudible) track more accurately, as
6 well as additional attributes uniformly shared by the
7 IP four and IP addresses.

8 Secondly, we want to know that with regards
9 to geo location and (inaudible) technology addresses
10 used by the largest (inaudible) service providers who
11 are (inaudible) consumer privacy data, that the noting
12 of the technical monitoring complication the IP six to
13 IP four (inaudible) issues, coupled with the inherit
14 (inaudible) providing of geo location, extremely
15 accurate today, will severely impact the geo location
16 monitor date of making archived collection of
17 (inaudible) accountable. We do suggest a multi-faceted
18 enhancement of geo location identifier or eliminate
19 (inaudible).

20 Consequently, these are complicated,
21 technical challenges that may require (inaudible) and
22 design do make current CCPA enforcement deadline
23 (inaudible). And I do recommend that Americans,
24 myself, the American (inaudible) numbers, California ID
25 Task Force, the internet appropriation (inaudible) for

1 (inaudible) numbers and provide (inaudible) and all my
2 comments due to their technicalities will be published
3 in an e-mail address. Thank you.

4 SPEAKER 17: Hello. My name is Andrew
5 Lackman (phonetic). I'm an attorney who works in data
6 privacy. Most of my clients have less than 25
7 employees. So probably just by virtue of revenue
8 alone, probably don't fall under this legislation,
9 although with the 50,000 records, it's always possible.

10 I also was the legislative director for
11 Congressman (inaudible), which is a graduate of this
12 prestigious institution, and attended Stanford
13 undergrad.

14 And I made this meeting here today. I wanted
15 to make Sacramento, but Delta decided it didn't have a
16 plane. There's some things you can't control.

17 But in attending the recent hearings out of
18 Sacramento on the bill itself, it became clear there's
19 another issue which hasn't fully been addressed in all
20 of this. And I do want to go right now, as we speak,
21 they're holding hearings on the exact same issue in
22 Sacramento. I don't know who decided to have two
23 meetings on the same issue at the same time, but I
24 think it does a disservice to many of the people here
25 who maybe care about changes to the legislation who

1 can't afford to have staff in multiple places. I work
2 for myself, and until I figure out the cloning policy,
3 I can only be in one place at one time.

4 But the issue that did come up was within the
5 definition of what is personal information. And the
6 definition in the legislation says, it's any
7 information which can be ascribed to an individual.
8 But, many companies either consciously pair or unpair
9 information so that any piece of information you can
10 collection be ascribed to an individual, if you give
11 the other information. And so because of the broad
12 definition, it creates about what is and isn't.

13 However, within GDPR, they have actually
14 addressed this by requiring companies through data
15 mapping to show what information they don't pair. And
16 so having that information, you can say, hey, I maybe I
17 collect an e-mail address and phone number of somebody,
18 but I don't pair that or connect that with their
19 purchase history, and here is how I separate it out.
20 And so by giving companies the opportunity to document
21 and prove that they do not pair this information, that
22 should be a reasonable alternative to make sure that
23 instead, they're not required to provide every piece of
24 information that they possibly could pair conceding in
25 the universe, if it's possible to do so.

1 So I'm going to be take to heart suggestions
2 about writing specific regulations, and I will be
3 providing those before the deadline. But did want to
4 bring that up as a very particular problem which can be
5 addressed within the regulatory context, which won't
6 change the (inaudible), and allows companies of all
7 sizes to be able to comply with the needs of the
8 public, while at the same time, not having to double,
9 triple or quadruple staffs to deal with potential data
10 subjects request. Thank you very much.

11 SPEAKER 18: Hello. My name is (inaudible) I
12 work for (inaudible) running business (audible).

13 Couple things became very one (inaudible)
14 request because, for example, in the average world data
15 (inaudible). Every time you go to a web page you see
16 an ap. In order to facilitate that ap, (inaudible)
17 that share your data with consumer (inaudible) about
18 web pages see data has been shared with some of the
19 website. I think data was important, (inaudible)
20 problems that to be able to make four, five companies
21 that (inaudible) and wouldn't be able to (inaudible)
22 consumers to data know.

23 And basically, (inaudible) from consumers in
24 Europe and (inaudible) consumers (inaudible) some kind
25 of (inaudible) enough to (inaudible) what do you do

1 about those (inaudible) I think I'm making the point
2 (inaudible).

3 For example, (inaudible). Quick comment
4 (inaudible) comment would be for the (inaudible) and my
5 education thought (inaudible) because many IP apply to
6 account for online they don't need my ID my account
7 they need my ID to get my account. Example I signed up
8 for (inaudible) and then put my account on hold because
9 they respected (inaudible) have and then I said
10 (inaudible) IT to get my and sign me up for their
11 e-mails, and I don't want to receive the e-mails. So
12 my e-mail list from your mailing list and they want my
13 ID (inaudible). So whatever phone number (inaudible)
14 using my for example so if I want to have (inaudible),
15 they don't need my ID because I gave them my ID the
16 first day. (inaudible).

17 SPEAKER 19: Can you hear me? My name is
18 (inaudible). I'm speaking of the private, retired and
19 legally disabled citizen. And I sense a gap in
20 (inaudible) law so have cross the law step out and stay
21 (inaudible) to charge me money to protect my privacy,
22 which offer me incentives so I'll surrender my personal
23 information (inaudible) act and this coercion.

24 California, as well as most of US, it's
25 illegal for an employer to discriminate or harass an

1 employee over 40 years of age or older (inaudible) and
2 a class. And state laws of California Fair Employment,
3 Housing, familiar with Section 1798.185 and I spend a
4 lot of time trying to find it (inaudible) are now
5 something I might have to pay for. And that's new and
6 (inaudible). How does that work? I couldn't find an
7 answer.

8 So because the a lot of us retired, on fixed
9 incomes, we have to choose between rent, utility,
10 telephone bills, transportation, clothing or protect
11 our privacy, which (inaudible).

12 And cutting to the chase, if you look up the
13 definition of "coercion," it's asking you to do
14 something you don't want to do. And it's 1798.125 P
15 four, coercion. So I think that something has to be
16 taken into account for people like me (inaudible) to
17 privacy violation in general (inaudible) legislation.
18 Thank you.

19 SPEAKER 20: Thanks. My name is Allen
20 (inaudible). I'm an attorney licensed in New York,
21 certified information (inaudible) privacy (inaudible)
22 professionals. I have a legal consulting practice that
23 works primarily with advertising technology and
24 marketing technology. So please (inaudible) in
25 response for your request. And I appreciate the

1 opportunity to.

2 I believe it will be difficult for ad tech
3 and (inaudible) businesses to implement CCPA without
4 some additional clarification. And these (inaudible)
5 challenges are particularly noteworthy given what I can
6 see was going on in Sacramento that there maybe a push
7 towards ensuring a private right of action under CCPA.
8 That has become (inaudible) issues to grave concerns to
9 the extent that there is a huge lack of clarity
10 (inaudible).

11 So first, it is unclear whether ad tech
12 companies are considered third parties or service
13 providers under the CCPA. I think even today you see
14 one person stand and say, oh, no. They're all service
15 providers, and somebody else say, no, they're in fact
16 third parties. So that, to me, would be inhibit us
17 that reasonable people can and are disagreeing about
18 those particular definitions.

19 And this distinction is particularly
20 important in the transfers of data to third parties in
21 business considered of sale on (inaudible) and
22 therefore, subject to (inaudible) choice requirements.

23 So specifically, the CCPA requires notice of
24 choice each time data is transferred that Section 1798
25 over 100 stipulates that the notice provided must be,

1 quote, at or before the point of collection, unquote.

2 So, if ad tech companies adopt a conservative
3 view (inaudible) third parties, that means that a
4 separate notice is in choice must be offered each time
5 data is transferred. So bringing this requirement into
6 the ad tech world, I'm just going to apologize in
7 advance for a little bit into the weeds here, but when
8 a website publisher transfers data to an advertising
9 exchange (inaudible) provided. And when that ad
10 exchange provides data to an ad server or demand site
11 platform, a separate notice and choice must be
12 provided. And with the demand site platform transfer
13 data, (inaudible) ad verification partner. An
14 additional notice of choice is required. And when the
15 demand site platform transfers data to a data
16 management platform -- okay, I think you understand
17 where I'm coming from.

18 So a single act in this example would
19 necessitate the provision of notice and choice four
20 separate times. That's assuming there's only one ad on
21 a single web page. Most web publishers have three,
22 four, five, ten. So the four time number goes up
23 exponentially. And if you want to honor the literal
24 requirement of the CCPA, you would need to have
25 something like 20 separate notice and choice

1 (inaudible) being launched on a consumer. And don't
2 think that would be the intent, and I don't think that
3 anybody wants that. But that's a reasonable read of
4 how the act is currently being -- as it currently
5 reads.

6 Okay. So I believe there are a few
7 clarifications that may address this issue. Number
8 one, please clarify what an NTP (inaudible) is a
9 service provider versus third party.

10 Number two, clarify what constitutes a
11 business purposes under CCPA. Again, I read that
12 definition to mean that just about anything an ad tech
13 or mar tech company does would be considered business
14 (inaudible). But I have colleagues whom I respect
15 greatly who take a different position. We would like
16 clarification on that.

17 And number three, clarify the sales of data
18 passed near real time would only necessitate the
19 provision of a single notice and choice. I think
20 that's the intent of the legislature, but it isn't how
21 the law currently reads.

22 My second point, a digital media space would
23 benefit with some clarification providing a choice
24 (inaudible). So that CCPA requires businesses to post
25 a "do not sell my data" on the website. I would concur

1 with my colleague, Rich -- actually, we're not really
2 colleagues (inaudible). But the gentleman in his
3 comments, in that I do think (inaudible) goes on every
4 single web page. But so I think I understand the
5 intent, but without some clarification, this "do not
6 sell" button would be difficult to implement in part,
7 because those requirements is currently worded
8 (inaudible).

9 Just by way of quick background, the way
10 digital media opt out currently work is they are vendor
11 specific. So it is an ad tech vendor that the consumer
12 has to be capability of opting out from. CCPA places
13 those requirements on businesses and third parties. So
14 the requirement would be an advertising publisher would
15 enable opt out from then. So that's not how the part
16 opt out situation is set up. And I think we just need
17 a little bit of clarification regarding whether or not
18 the industry opt out pages (inaudible). We need some
19 clarification whether those are sufficient under the
20 AG's interpretation of the CCPA.

21 I know over time, I apologize, but thank you
22 very much. I appreciate it.

23 SPEAKER 21: I'll go quickly, and I
24 (inaudible).

25 Quick overview. You heard some people

1 transfer data to another person to another person to
2 another person. (inaudible) six different
3 subprocessors for (inaudible) without any of the
4 indication or awareness being made to the consumer,
5 without them being in the same country, the same
6 network, or even the same universe.

7 So in reality, we need a mechanism, which I
8 don't currently see (inaudible) I'm limiting what you
9 can do, there we will need to have (inaudible)
10 controller, processor, which is the definition of the
11 rest of the world (inaudible) other laws.

12 With regard to the questions asked, I will
13 make a few requests. Request number one, please make
14 sure that the law requires the assignment of the data
15 protection officer, whether that is his or her
16 (inaudible). Right now, the responsibility in the
17 organization is not that clear.

18 Second request, the definition of "personal
19 information", we should clarify, we should make it
20 probably similar in the (inaudible) we should also
21 create a higher level of SPI and clarify the approach
22 to PHI (inaudible)

23 Next point, without transparency, there
24 cannot be any formed consent. The point of
25 transparency has got to their own, if we are to say a

1 person owns their data and can control what we share.

2 Next request, we are requesting that the ID
3 of electronic devices will be completely forbidden for
4 businesses polling, except for in the case of law
5 enforcement requirements.

6 Next request, verification. The GDPR makes
7 it clear that the verification of the individual's
8 request in the subject access request should not be
9 more onerous than the creation of the record in the
10 first place. In other words, if you trust who I am by
11 asking first name and last name, please accept my
12 request when I provide you only my last name and first
13 name -- okay.

14 We are requesting clarification regarding the
15 conflict of HIPAA and regarding GOPS. Well, and we are
16 also asking for clarification regarding the US
17 Constitution Congress clause. In other words, some of
18 my clients are going to come to rely on the CCPA, and
19 it will be very sad because Congress calls the
20 situation where their compliance is completely
21 nullified.

22 We're requesting clarification of the
23 (inaudible). When somebody's GPS is tracking, what
24 happens when they enter the State of California? What
25 rights or obligations occur? (inaudible) as request

1 clarification of third party service providers, data
2 brokers, and of selling.

3 I read this law quite a few times, and I
4 can't tell if (inaudible) first category, second
5 category (inaudible).

6 We're requesting that the disclosure of
7 (inaudible) right and assume data regarding individual
8 be included both in disclosing what (inaudible) and in
9 the right to object.

10 We mentioned, for example, the company called
11 (inaudible). They have a lot of data on people,
12 (inaudible), but the right them assume they are
13 (inaudible) for me, there's no rest.

14 We are requesting that you consider
15 compliance and singularization of ISO 29100 regarding
16 definition for personal information and the ways to
17 preserve personal information.

18 We are suggesting that the appointment of
19 advisory panel to advise the Attorney General and
20 separately other organizations within the state
21 regarding the interpretation and the enforcement of the
22 CCPA and the right (inaudible).

23 We are requesting clarification of the
24 private right to action. For two reasons. Number one,
25 I cannot tell my clients if they're going to be on the

1 hoop for \$7,500 or for \$7,500 per record.

2 Removal of the incentives with regard to how
3 long companies collect and keep your personal data
4 typically (inaudible) hurt the weakest (inaudible) of
5 society, the buyer or people without means.

6 And finally we're asking that -- sorry. We
7 are asking that the new (inaudible) regarding the
8 impermissibility of sharing of data, which certain
9 regimes or certain companies within the geography of
10 certain regimes (inaudible) privacy.

11 Thank you very much.

12 SPEAKER 22: (inaudible) I have a pure
13 observation about we have tech oil (inaudible) people
14 to use it. (inaudible) this law is very broad. And
15 what I would like us to kind of understand is that if
16 we have nothing to protect consumers today, we should
17 find a reliable product of protection rather than
18 (inaudible) for businesses to be able to verify and
19 produce a verifiable solution, easily accessed and be
20 able to understand. And because businesses will be
21 able to comply. What is (inaudible) in this law?

22 Number two, the AG's office has to come up
23 with a way to audit businesses are complying to this.
24 The point is that compliance (inaudible).

25 So going into one of the sections of 1798.135

1 C, consumer may authorize another person to be able to
2 request on their behalf, how do we communicate with
3 this person? What is the authorization (inaudible)
4 Secretary of State who somebody actually authorized
5 this. (inaudible) communication electronic? It's
6 communication is (inaudible) web page where consumer
7 comes in who doesn't probably (inaudible) have an
8 account. (inaudible) collect information to be able to
9 see whether they exist in the system, how long are we
10 allowed to keep the records so we know that verifiable
11 request, if that information happens to be first name,
12 last name, (inaudible) all because that is how verify
13 in the system that the person's name exists? How are
14 we supposed to retain if it is going to be twice in a
15 year? If you request it already once or twice, we can
16 keep (inaudible) at some point, we're going to have to
17 tell the consumer, hey, you already (inaudible) two
18 limit, or we have to maintain a record another
19 (inaudible) trace, a verification on communication. So
20 there's a lot of things that needs to be maintained in
21 a system that could require if you have an account
22 tying to your ID as a consumer who is registered
23 business, which you do not have it, but a consumer
24 keeps coming every month just to test it, how do we
25 keep track of that consumer coming in? Right.

1 So there are a lot of these questions that
2 are (inaudible) asking for ID verification. Well,
3 there's pros and cons to it. If you want to protect
4 the consumer, you have to identify it is who you're
5 requesting is actually a consumer or an authorized
6 person. Obviously, it's easy to create an account
7 because that is what we allow people to create an
8 account. If somebody wants to destroy something, you
9 verify. It's everywhere.

10 It's ease to see how this is going to be
11 somewhat managed in a way that is going to make both
12 consumer and the businesses to be able to work together
13 in a simple (inaudible).

14 SPEAKER 23: Good afternoon. My name is
15 (inaudible) I'm an attorney and from Texas. And I
16 want to first and foremost tell you that I wanted
17 (inaudible) people said --

18 MS. KIM: Could you speak a little closer to
19 the mike.

20 SPEAKER 23: (inaudible) I agree. The CCPA
21 is not perfect. It isn't. Yet, how it's written, and
22 more importantly, interpreted bear on how the issues
23 position regulations on something and (inaudible) I
24 spent 17 years in my career (inaudible).

25 First one is balance. Respectfully disagree

1 with some of the people here today. Balance must be
2 made between (inaudible).

3 Reasonable regulations. What you are dealing
4 with is imperfect law and (inaudible). California is a
5 fifth largest economy (inaudible). I urge you to
6 concentrate on clarity all for parties involved
7 compliance for (inaudible) exercising consumer rights.
8 Narrow definition in particular sale and business
9 (inaudible) consequences in abuse, establish
10 regulations that have compliance which you need.
11 (inaudible) and one, that is the definition, which you
12 also (inaudible).

13 Respectfully, amendments (inaudible). One
14 thing I must say as an example when correction in
15 conflict in particular time period with which
16 (inaudible) has to respond. (inaudible) formerly
17 mentioned (inaudible) that's not the only
18 constitutional issue here.

19 Obviously, any comments to assist you
20 (inaudible). Thank you for your time.

21 SPEAKER 25: (inaudible) my comments, my name
22 is Heidi. I have a broad set of personal experiences
23 that (inaudible) my comments. I'm a mom, I care very
24 deeply about my kids' privacy, and in the amount of
25 time they spend on their aps, and how that reflects on

1 me as a parent. Too much. But I do worry about them
2 having the permanent record of their behaviors online.
3 So I really wanted to applaud the sections of the CCPA
4 that apply to children's privacy.

5 I worked in tech for over a decade. I worked
6 in the data protection space (inaudible). My
7 experience there was that if there's no threat of
8 enforcement, there is no business justification to make
9 any expensive changes to the way that companies
10 operates. The way that the businesses analyzed
11 (inaudible) a risk analysis. And what goes into it is
12 what'd the impact, you know, how much of a fine
13 potentially is there going to be to my business, and
14 what's likelihood that the Attorney General or the --
15 any other enforcement agency is really going to do
16 anything?

17 So I just think it's (inaudible) so critical.
18 And we know currently in the state Senate and
19 (inaudible) the Attorney General's office (inaudible)
20 Legislature, there is few people who are talking about
21 local government enforcement (inaudible) common sense
22 media. And I think the Attorney General will be
23 allies.

24 And I would like to encourage you to consider
25 local counties and city attorneys as an extended force

1 that you can call upon. I think the law does give you
2 the authority to act broadly in that way and put that
3 stipulation into the law, assuming that the Legislature
4 does not do that -- they're not currently doing that.

5 In fact, at the state assembly hearing,
6 Assembly Member Irwin is actually confused about
7 whether that still exists in the law or not.

8 So with our legislative (inaudible) I think
9 it's up to you (inaudible) to act (inaudible) if we
10 really want to see change with the way our personal
11 data is being handled by the companies.

12 And the economy in this area is growing so
13 fast largely because (inaudible) probably more than
14 half my close friends work for those companies. I
15 don't want to see damage done to the economy and to my
16 friends' industries, however, it's just gotten out of
17 control. And I think the balance currently has shifted
18 way in favor of business to the point it really
19 threatens democracy as we know it. It's (inaudible)
20 and enforcement actions. Someone who's worked in tech
21 for many years, and someone who currently works in a
22 local government, which I will remain anonymous about,
23 because we are providing formal comments, written
24 (inaudible).

25 So I don't envy your job. Good luck to you.

1 And thank you for letting me comment.

2 MS. KIM: After this comment, we'll take a
3 short break and then we'll resume.

4 SPEAKER 26: My name is Joellen Kaiser
5 (phonetic), and I came here today to comment.

6 I'm on the board of a non-profit as concerned
7 about privacy. But I'm actually speaking you to today
8 as an ordinary citizen. Because as I'm listening to
9 the comments, I realize that there's a population that
10 is almost never considered in this kind of rule making
11 that really needs to be thought about, especially when
12 we're talking about categories and who gets to make
13 decisions about somebody's information, whether it's an
14 individual or household.

15 I'm a caregiver for two elderly relatives.
16 And these are people who, guardianship is a really huge
17 step to take with elderly relatives. You don't want to
18 go into guardianship and go into courts if you don't
19 have to. It hurts their sense of dignity. Some
20 (inaudible) powers of attorney around finance and
21 health care.

22 But what we find is, increasingly, we have to
23 do things online for them. Things such as managing
24 their newspaper subscriptions. Everything is online.
25 And we have to get lists for them to go places

1 (inaudible). You know what I mean? It's all online.

2 And I'm starting to say, I'm starting to
3 realize that I'm in situation of such seniors. In
4 fact, any of us who suddenly become ill and unable to
5 get on our computer, how do we verify the person who is
6 going be able to act on their behalf?

7 And what if it's not a relative? What if
8 they're not in a household? I have friends who take
9 care of elderly, single people, and they're not their
10 relatives. They're their close friends.

11 So what is going to be the mechanism of what
12 would power of attorney serve in that place? What
13 (inaudible) going to help us understand who would be in
14 charge of some of this information?

15 And it's really -- especially with seniors,
16 they're very freaked out about personal information in
17 a way I think most of us have given up on in some ways.
18 Seniors are really upset about it. So I'm really
19 asking you as in your roll making, in addition to
20 consider kids and those of us (inaudible) please
21 consider seniors. Thanks.

22 MS. KIM: Thank you guys. It is about 2:52
23 so we'll take a break until about 3:05 and resume if
24 there's additional comments to be made. Thank you.

25 (Off the record.)

1 MS. KIM: Thank you so much for sticking
2 around. We're going to go ahead and get started again.
3 So if there are any additional speakers, please feel
4 free to come forward to the mike, or come to the front.
5 And if there's nobody we're going sit in silence for a
6 little bit.

7 SPEAKER 27: (inaudible) personal comments
8 (inaudible).

9 SPEAKER 28: I'm not trying to pretend I'm
10 somebody else by standing on this side of the room.

11 I just have one additional comment I didn't
12 get to. I don't think anybody here really brought up.
13 You guys have a huge job. There's a lot of work that
14 needs to happen. So what I'm understanding the
15 timeline right now called to start the process that's
16 provided guidance, which to me is guidance may not be
17 received until sometime (inaudible) companies that are
18 fairly put if you're dealing with companies like the
19 agency holding company or General Electric or somebody
20 who's really large, that's like turning around an
21 aircraft carrier. And I would just respectfully say
22 that six months is probably not going to be enough time
23 for a lot of these types of changes to be implemented.
24 Particularly in light of some of the perceived
25 ambiguities.

1 So I recognize the AG's office -- deadline
2 has already been extended. I would strongly encourage
3 you to consider extending it further, particularly if
4 the AG's office is not able to get guidance, you know,
5 by September or so.

6 I appreciate the need to get this right. And
7 so I think that's a lot of the world to support. But
8 if the -- if we don't have guidance, you know, until
9 three months before we're supposed to comply, that's
10 just going to be a huge problem. Thank you.

11 SPEAKER 29: (inaudible) We also concerned
12 about (inaudible) action. Because you said the
13 Attorney General will not be prosecuting until a
14 certain deadline. But I don't see anything saying that
15 the deadline for privacy causes of action (inaudible)
16 January 1. So we're looking at (inaudible) 2020 that
17 rules people (inaudible). So with the deadlines,
18 please don't forget that they try to (inaudible) action
19 as well because everybody have the opportunity.
20 Thank you.

21

22

23 MS. KIM: Sorry. I recognize this is a bit
24 of an uncomfortable silence. It's something that we
25 call air courage so that if there is anybody else who

1 maybe considered wanting to speak, but didn't have the
2 courage to do so, we'll just sit in silence for a
3 while.

4 But feel free to take a stand or just if you
5 would like to leave, you're welcome to. If you like to
6 stick around, we are probably going to stick around for
7 at least another 10, 15 minutes.

8 SPEAKER 30: I just want to make a comment.
9 My name is (inaudible) I'm an attorney, (inaudible) I
10 have thoughts on the law, based on some discussions
11 I've had in the (inaudible) area.

12 I think what we need is (inaudible) clarity.
13 I have four points that I would like to make.

14 The first is I would like to see clarity in
15 the definition of the term "category" (inaudible). It
16 would be nice to see where the AG considered categories
17 of businesses, how expansive they need to be in
18 descriptions (inaudible) disclosures.

19 Second, it would be nice know what makes a
20 request manifestly towards unfounded or excessive.
21 Businesses are not required to respond to request
22 (inaudible) excessive but that term is not defined. So
23 clarity in that definition would be helpful.

24 Finally, I think it was mentioned earlier by
25 the gentleman to your left, there is an contribution in

1 the law regarding when businesses must respond to the
2 consumer request. So under 1798.1382, business is
3 entitled to a (inaudible) deadline extension of the
4 time to respond as reasonable. But under 145
5 (inaudible), a 90-day deadline or extension of the
6 deadline is provided. So each of those businesses get
7 extension (inaudible).

8 MS. KIM: Thank you everyone for coming. I
9 just want to remind you that you can submit written
10 comments to that e-mail address on the Power Point
11 slide, or you can mail them in as well. And we
12 strongly encourage you to do it by this Friday.
13 Thank you.

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15 ---oOo---

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REPORTER'S CERTIFICATE

---oOo---

I, SHANNON D. DENNEY, CSR 10385, a Certified
Shorthand Reporter in the State of California, do
hereby certify:

That the foregoing audio recording was
transcribed by me; that a verbatim record of the
recording was made by me using machine shorthand, which
was transcribed to the best of my ability.

IN WITNESS THEREOF, I have this date
subscribed my name.

Dated: April 12, 2019.



Shannon D. Denney, CSR 10385
Certified Shorthand Reporter
State of California