

**Testimony of  
Bethanne Cooley  
Director, State Legislative Affairs  
CTIA-The Wireless Association®  
Concerns Regarding Connecticut Senate Bill 66  
February 3<sup>rd</sup>, 2015**

**Before the Connecticut General Laws Committee**

Co-Chair Leone, Co-Chair Baram, and members of the Committee, on behalf of CTIA-The Wireless Association®, the trade association for the wireless communications industry, I write to respectfully express concern regarding Senate Bill 66. Senate Bill 66 would “prohibit retail businesses from requiring persons to provide social security numbers in consumer transactions in order to gain access to an Internet web site or to enter into a retail business's computer system.” We are concerned this legislation could inadvertently make consumers vulnerable to fraud as well as impact the legitimate business practices of wireless companies.

CTIA and its members take protecting their customers' privacy very seriously. Since 2003, all of the wireless carriers currently operating in Connecticut have abided by CTIA's Consumer Code for Wireless Service. The Code contains a provision regarding the protection of customer privacy. The customer privacy provision provides in part that “each wireless carrier will abide by a policy regarding the privacy of customer information in accordance with applicable federal and state laws, and will make available to the public its privacy policy concerning information collected online.”<sup>1</sup>

The wireless industry does have concerns with Senate Bill 66. When a wireless customer enters into a monthly contract to receive wireless service, oftentimes a social security number is requested to serve two purposes: to perform a credit check to ensure the wireless customer will be able to meet the monthly payment obligations; and, to verify the customer's identity. Verifying a social security number both authenticates the wireless customer and helps prevent

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<sup>1</sup> “CTIA Consumer Code for Wireless Service,” <http://www.ctia.org/policy-initiatives/voluntary-guidelines/consumer-code-for-wireless-service>, last accessed 1/22/2015.

fraudulent subscriptions. This authentication process is beneficial for both wireless companies and consumers by ensuring that companies and consumers are not victims of fraud.

Furthermore, a social security number is often a requirement in verifying eligibility for government benefits. Verification of a valid social security number is typically a requirement in order to qualify for wireless Lifeline service, for example.

In closing, the wireless industry certainly appreciates and shares the sponsor's intent to protect consumer privacy. However, we have concerns that Senate Bill 66 may not further that goal. We would welcome the opportunity to work with the sponsor to address our concerns to ensure the legislation properly balances privacy protections while preserving legitimate businesses practices.