



SanHi

GOVERNMENT STRATEGIES

A LIMITED LIABILITY LAW PARTNERSHIP

DATE: February 5, 2026

TO: Representative Darius Kila
Chair, Committee on Transportation

FROM: Tiffany Yajima

RE: **H.B. 2462 - Relating to Consumer Protection**
Hearing Date: Thursday, February 5, 2026 at 9:30 a.m.
Conference Room: 430

Dear Chair Kila, Vice Chair Miyake, and Members of the Committee on Transportation:

On behalf of the Alliance for Automotive Innovation (“Auto Innovators”) we submit this testimony in **opposition** of H.B. 2462 - Relating to Consumer Protection.

The Alliance for Automotive Innovation represents the full auto industry, a sector supporting 10 million American jobs and five percent of the economy. From the manufacturers producing most vehicles sold in the U.S. to autonomous vehicle innovators to equipment suppliers, battery producers and semiconductor makers – the association is committed to a cleaner, safer and smarter personal transportation future.

The intent of this measure is to ban subscription fees for built-in car features. The bill would prohibit manufacturers and dealers from charging a recurring subscription fee for any feature that uses hardware already installed in the vehicle at the time of purchase, can function entirely with the car’s existing hardware or software, and does not require external data networks or third-party services.

New vehicle technology continues to advance, and software is developed with each new model year. This bill would prohibit new and used car owners from benefiting from software advancements after purchasing their vehicles.

All vehicles are manufactured to be equipped with the same hardware and are sold with this hardware installed in a car. Subscription services give consumers the ability to purchase additional features based on their personal preferences. This customization allows manufacturers to offer products to consumers at a lower price point than offering all features in a bundle at a higher price point but containing features that not every consumer wants.

This measure may unintentionally restrict consumers from benefitting from future technological improvements. As vehicle technology evolves and consumer preferences change over time, automakers can use the existing technology in a car to roll out new features that were not available when the car was purchased. Under this bill, however, automakers would be barred from offering subscription-based access to new or enhanced features if those features rely solely on existing in-vehicle hardware.

As a result, the bill could prevent consumers from receiving updates or advancements to technologies embedded in their vehicles, even when those improvements enhance safety, performance, or functionality.

In addition, this measure could disadvantage used car buyers which represent three times the number of vehicles sold in the state compared to new cars by preventing second-hand owners from selecting the newest and safest vehicle technology available even though their vehicles have the capability. This demographic would not be able to take advantage of their car's technology to subscribe to the newest technological advances, enhancements and upgrade features to meet their own consumer preferences, and would create an inequity between new car purchasers who can afford to choose features and second-hand buyers who cannot afford the price of a new car. This inequity will only increase as future cars rely more heavily on software.

For these reasons, we strongly oppose this bill and respectfully ask the committee to hold this measure.

Thank you for the opportunity to submit this testimony.

HB-2462

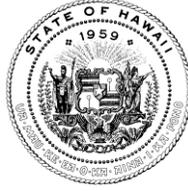
Submitted on: 2/4/2026 2:43:50 AM

Testimony for TRN on 2/5/2026 9:30:00 AM

Submitted By	Organization	Testifier Position	Testify
Michelle R Stefanik	Individual	Support	Written Testimony Only

Comments:

I support this bill. Subscription service charges have gotten way out of hand. When you purchase a car you should be able to own the car and all it's features and not have to pay forever for features installed on the car. Vote YES!



STATE OF HAWAII | KA MOKU'ĀINA 'O HAWAI'I
OFFICE OF THE DIRECTOR
DEPARTMENT OF COMMERCE AND CONSUMER AFFAIRS

NADINE Y. ANDO
DIRECTOR | KA LUNA HO'OKELE

JOSH GREEN, M.D.
GOVERNOR | KE KIA'ĀINA
SYLVIA LUKE
LIEUTENANT GOVERNOR | KA HOPE KIA'ĀINA

DEAN I HAZAMA
DEPUTY DIRECTOR | KA HOPE LUNA HO'OKELE

KA 'OIHANA PILI KĀLEPA
335 MERCHANT STREET, ROOM 310
P.O. BOX 541
HONOLULU, HAWAII 96809
Phone Number: (808) 586-2850
Fax Number: (808) 586-2856
cca.hawaii.gov

Testimony of the Department of Commerce and Consumer Affairs

Office of Consumer Protection

Before the House Committee on Transportation

Thursday, February 5, 2026

9:30 AM

Via Videoconference

Conference Room 430

On the following measure:

HB 2462, Relating to Consumer Protection

Chair Kila and Members of the Committee:

My name is Melissa Enright, and I am an Enforcement Attorney at the Department of Commerce and Consumer Affairs' (Department) Office of Consumer Protection (OCP). The Department supports the intent of this bill and offers comments.

Cars have become more than just a means of transportation. The prevalence of features like wi-fi and hands-free driving have turned cars into digital platforms. Auto manufactures have increasingly turned to subscription services to generate additional revenue by charging consumers for what have previously been standard options paid for at the time of purchase. By restricting the offering of subscription or post-purchase fees for features that are not an ongoing expense for dealers or manufacturers, this bill will provide greater transparency for consumers.

Testimony of DCCA

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OCP notes that the enforcement mechanism of Chapter 481B is through a court of law, while this bill cites to an “enforcing authority.” To create consistency within Chapter 481B, OCP recommends that “enforcing authority” be replaced with “the court.”

Thank you for the opportunity to testify on this bill.

HB-2462

Submitted on: 2/4/2026 6:59:11 PM

Testimony for TRN on 2/5/2026 9:30:00 AM

Submitted By	Organization	Testifier Position	Testify
Lisa Bishop	Individual	Support	Written Testimony Only

Comments:

Please pass this common sense consumer protection bill.

Mahalo!

Lisa Bishop

Oahu resident