

# Comments to California Attorney General on Proposed Rules for the California Consumer Privacy Act

DANIEL CASTRO AND ALAN MCQUINN | MARCH 2019

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ITIF has filed comments with the California Attorney General regarding its preliminary rulemaking process for the California Consumer Privacy Act. ITIF argues the Attorney General should clarify its rules to minimize their burden on innovation.

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ITIF has filed comments with the California Attorney General regarding its preliminary rulemaking process for the California Consumer Privacy Act (CCPA). CCPA establishes new consumer data protection rights and creates new requirements for businesses collecting and handling personal information. ITIF argues the California Attorney General's office should clarify its rules around jurisdiction, CCPA exceptions, and enforcement. It should also interpret these rules to minimize compliance burdens through the transparency and access provisions, as well as allow companies to create disincentives for free riders. To the extent the Attorney General does not believe it has the authority to use its discretion in these ways, the Attorney General should seek legislative changes to that effect. Moreover, as the Attorney General seeks to amend CCPA, it should not support SB 561, which would reduce the California Department of Justice's flexibility in enforcement and increase compliance costs and legal risk for businesses throughout California.