

# streaming / innovation / alliance

March 5, 2025

State Rep. Kevin Vaughan  
Chair, House Commerce Committee  
425 Rep. John Lewis Way N.  
Suite 622 Cordell Hull Bldg.  
Nashville, TN 37243

Dear Chair Vaughan,

We write seeking changes to SB 302.

SIA is the united voice of the streaming community, working to tell streaming's positive story to state and federal policymakers. We seek to drive forward a new era of creativity, opportunity, value, and choice in home and mobile entertainment by advocating for smart policies that will support innovative streaming services and the viewers who love and depend on them. Our members represent the variety and breadth of streaming options available to consumers today including major entertainment services as well as smaller and independent options that offer relevant, authentic stories reflecting virtually every culture and community, with programming ranging from live sports to historical drama and everything in between.<sup>1</sup>

SIA's members work hard to provide intuitive, easy to use services with fair and transparent service plans and contracting. These can include pre-paid annual plans offered at a discount; monthly contracting and billing plans without long-term commitments; easy online and app-based service management and cancellation options; clear and conspicuous up front disclosures regarding contract terms and options to manage, change, or cancel service; and a wide array of free/ad-supported models including many options where auto-renewal isn't an issue at all. Our basic principles on auto-renewal issues and regulation are available [here](#).

Tennessee has long been a leader in autorenewal laws, with many states looking to Tennessee's current law as model legislation. We appreciate Senator Harshbarger's leadership protecting Tennessee consumers and the good intentions behind SB 302. However, in its current form the bill strikes the wrong balance and in two important ways would undermine pro-consumer practices like short-term free trials.

First, unless amended, the bill would bar companies from collecting payment information when a user signs up for a free trial. Collecting payment information is a standard industry practice that ensures there is no disruption in service when a user's free trial expires and helps combat fraud by consumers who might otherwise sign up for successive free trials. Barring collection of payment information on sign up would as a practical matter make it very difficult for companies to offer free trials in the first place.

Second, in its current form the bill requires businesses offering free trials to obtain a customer's consent a second time after the trial expires regardless of how long the free trial period is,

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<sup>1</sup> SIA's Members are: AfroLandTV, America Nu Network, BET+, Demand Africa, discovery+, FedNet, For Us By Us Network, In The Black Network, Max, MPA, MotorTrend+, Netflix, Paramount+, Peacock, PlutoTV, Radiant Media, Skinsplex Native America Online, Telemundo, Televisa Univision, TVEI Network, VAULT, Vix, The Walt Disney Company. See [StreamingInnovationAlliance.com](https://StreamingInnovationAlliance.com)

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despite the user having already accepted terms of service including clear disclosure about any relevant automatic renewal terms at the start of the free trial and after the user has received notice of the upcoming expiration of the trial period that includes their right to cancel. By requiring a duplicative and additional consent after a trial period ends, this would invariably cause disruptions in service and upset industry-standards and consumer expectations that service continue after a trial period barring some action by them. While at the same time forcing Tennessee businesses to spend billions building out digital systems and infrastructure to comply with these inflexible new mandates.

Amending SB 302 to cure these problems would result in a strong, pro-consumer bill establishing landmark protections for Tennesseans, including requirements that businesses clearly describe automatic renewal terms in any initial agreement (including one that contains a free trial), provide additional notice when services renew for more than 60 days, deliver terms of any subscription in a form consumers can retain, offer easy-to-use cancellation tools (including online cancellation if the user can accept the automatic renewal online), and more.

Thank you for considering our views as you refine and finalize this legislation.

Sincerely,

**Streaming Innovation Alliance**

cc: Rep. Rush Bricken, Vice-Chair, House Commerce Committee  
Rep. Tandy Darby, Chair, House Subcommittee on Banking & Consumer Affairs  
Rep. Michael Hale, Member, House Subcommittee on Banking & Consumer Affairs  
Rep. Caleb Hemmer, Member, House Subcommittee on Banking & Consumer Affairs  
Rep. Kelly Keisling, Member, House Subcommittee on Banking & Consumer Affairs  
Rep. Susan Lynn, Member, House Subcommittee on Banking & Consumer Affairs  
Rep. Pat. March, Member, House Subcommittee on Banking & Consumer Affairs