



## California Attorney General's Office Hosts Public Forum for CCPA Rulemaking

January 10th, 2019

On January 8, 2019, the California attorney general's office hosted in San Francisco the first public forum on regulations it will write under the California Consumer Privacy Act, which will significantly alter the regulatory landscape governing the collection and use of data on California residents. The office will host five more meetings across California through February 13, 2019, to obtain additional public comments on the regulations.

The attorney general's office indicated that they will be promulgating regulations to implement the CCPA related to the following issues:

1. Categories of personal information;
2. Definition of unique identifiers;
3. Exceptions to the CCPA;
4. Submitting and complying with requests;
5. Uniform opt-out logo/button;
6. Notices and information to consumers; and
7. Verification of consumers' requests.

A Hudson Cook, LLP, representative attended the meeting along with about 150 other individuals, including tech companies, business lobbyists, and consumer advocates. Commenters raised a number of compliance concerns, including the definition of "personal information," the businesses that would be directly subject to the law, and the anticipated challenges in making the disclosures required by the law. Commenters also expressed concerns related to the application of the law to "deidentified" information and interpretation of the law's anti-discrimination provisions. Finally, several businesses pushed for the attorney general to create a safe harbor for certain business-purpose transfers.

The attorney general's office indicated that they would not be making any comments or responding to questions during this public comment process. In addition to receiving comments at the meetings, the office is currently receiving comments by email (at [privacyregulations@doj.ca.gov](mailto:privacyregulations@doj.ca.gov)) and mail (at the address provided in the attachment below). The attorney general must adopt regulations on or before July 1, 2020, and may not bring any enforcement action under the CCPA until six months after publication of the final regulations or July 1, 2020, whichever is sooner.

The CCPA is effective January 1, 2020. Aside from the attorney general's rulemaking, legislators have indicated that they may pursue further amendments to the law this legislative session.

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We will continue to monitor and report on these developments.

Prior Alert: [California Amends Consumer Privacy Act](#)

[CCPA Rulemaking Activity](#)

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