



October 10, 2024

Samuel Levine  
Director of the Bureau of Consumer Protection  
Federal Trade Commission  
600 Pennsylvania Avenue, NW  
Washington, DC 20580

Dear Director Levine,

Consumer Reports, U.S. PIRG, and 60 self-reported owners of JuiceBox EV chargers would like to ask the FTC to investigate the behavior of Enel X — an Italian company which has abruptly discontinued sales and support of its JuiceBox EV chargers ranging in price from \$600 to \$1,600 with less than two weeks notice. The decision to stop supporting the app that thousands of consumers use to control the charger and the complete loss of functionality for the commercial EV chargers represents an egregious example of how companies are controlling the functionality of a product even after the consumer has purchased the device.

Last month, Consumer Reports and 16 other groups sent a [letter](#) to the FTC asking the agency to set guardrails around the practice of software tethering.<sup>1</sup> This latest example is an especially extreme case, as deprecating software support may actually cause physical harm to consumers in addition to the loss of purchased functionality. Additionally, there is the possibility that the company has stepped away from the North American market to avoid responsibly solving a potential cybersecurity issue discovered in its chargers. Enel X's sudden decision to revoke support for its products in North America will cause significant harm to consumers, and may well constitute a deceptive or unfair business practice under Section 5 of the Federal Trade Commission Act.

On October 2, Enel X notified customers that Enel X Way North America planned to discontinue operations in Canada and North America on October 11, noting that “the dynamics of the EV market in the US have changed quite a lot in the last year and, like many other companies, Enel X Way North America has been impacted by high interest rates which have increased the cost of scaling the charging infrastructure business in a framework of sustained uncertainty where EV sales growth expectations have not been met.”

---

<sup>1</sup> Consumer Reports, U.S. PIRG, *et al.* “Letter to the Federal Trade Commission on Software Tethering/” September 5, 2024. <https://advocacy.consumerreports.org/research/group-letter-ftc-software-tethering/>

The notice said that consumers could still use the JuiceBox's physical hardware to charge their EVs, but that the app consumers used to control the charger and any features requiring a server connection would be stopped. However, for consumers, the end of app and server support means that their products would lose substantial functionality, including potentially critical functionality that allows them to adjust the amperage coming into the car from the charger. This means that consumers who are unable to adjust their settings before the October 11 deadline could see their chargers push too much amperage into the vehicle, potentially damaging the EV's battery, shorting out their breaker box, and posing a risk of fire.

The loss of the app will also limit the consumer's ability to adjust the time of day that the vehicle chargers, leaving them unable to easily take advantage of lowered rates for charging their vehicle at night or other non-peak hours. The loss of the app and server connection will also mean that all commercial charging stations will lose *all* functionality. The Enel X JuiceBox Pro 40 Commercial chargers are used by businesses to provide charging for customers and can cost \$1,600. These chargers will be rendered useless on Friday.

Of note is that a group of security researchers [published an exploit](#)<sup>2</sup> on August 29 that showed how hackers could use the JuiceBox to get the Wi-Fi credentials for a consumer's or business' Wi-Fi network using a flaw in the underlying firmware. This particular exploit is one that the developer of the chip and underlying firmware, Silicon Labs, has said it will not patch. Thus, there is not a fix for the vulnerability that is tied to the JuiceBox's Wi-Fi radio and firmware. As the researchers write:

In theory, the use of a microcontroller combined with an RTOS that has all the essential functionality built-in, with an online platform that can be used to manage and OTA update the devices sounds great. However, the support period becomes limited to how long that platform vendor is willing to keep maintaining the platform. Switching to a different platform or applying patches to a proprietary OS is almost impossible for such devices. This example highlights one of the major issues with IoT security, which is that the support window for software could end much earlier than the expected lifespan of the hardware. And sometimes, as in this case, such an issue is not always due to the device vendor. It can also occur due to third-parties that constitute a critical part of the software supply chain for a piece of equipment.

The possibility that Enel X is abandoning the North American market and rendering thousands of commercial chargers inoperable, while also reducing the functionality of consumers' chargers at such short notice because it has discovered an unpatchable security flaw is concerning. A company should not have the ability to sidestep all responsibility to its customers because one of its vendors has decided not to patch a security flaw in their device.

---

<sup>2</sup> "Pwn2Own Automotive 2024: Hacking the JuiceBox 40." Sector 7 blog. August 29, 2024. <https://sector7.computest.nl/post/2024-08-pwn2own-automotive-juicebox-40/>

If you have questions please reach out to me at  
stacey.higginbotham.consultant@consumer.org.

Respectfully,

Stacey Higginbotham  
Policy Fellow  
Consumer Reports

Justin Brookman  
Director of Technology Policy  
Consumer Reports

Lucas Rockett Gutterman  
Designed to Last Campaign Director  
U.S. PIRG

J. Nathan Matias, representing the Ecovillage At Ithaca, and JuiceBox owner  
Nikki Gordon-Bloomfield, Transport Evolved LLC and JuiceBox owner  
William Henderson, Founder, Ride Report, and JuiceBox owner  
Andy Saylor, PhD, Security Engineer and JuiceBox Owner  
R. Isenberg, JuiceBox owner  
Dale Klein, JuiceBox owner  
Frank Vineyard, JuiceBox owner  
Andre Couturier, JuiceBox owner  
James P. Buzbee, JuiceBox owner  
Frank Alvarez, JuiceBox owner  
Nicholas Gordon, P.E., JuiceBox owner  
John Degenstein, JuiceBox owner  
K. Allen, JuiceBox owner  
Abraham Tehrani, JuiceBox owner  
Jeff Roper, JuiceBox owner  
Robert Evinger, JuiceBox owner  
Gareth Williams, JuiceBox owner  
Robert Aitchison, JuiceBox owner  
John Ziehr, JuiceBox owner  
Gary Stower, JuiceBox owner  
Eric Smith, JuiceBox owner  
Steven B. Ewall, JuiceBox owner  
Christopher Stasinski, JuiceBox owner  
Paul A DeYoung, JuiceBox owner  
James Foreman, JuiceBox owner  
David J. Betowski, JuiceBox owner  
Douglas Freeman, JuiceBox owner

Stephanie Rogers, JuiceBox owner  
Jason Iler, JuiceBox owner  
P. Rozelle, JuiceBox owner  
Brian Holland, JuiceBox owner  
Judith Lytel, JuiceBox owner  
Kennedy M. Brandt, JuiceBox owner  
Jeff Lightfoot, JuiceBox owner  
Yoni Samlan, JuiceBox owner  
Kyle Raine, JuiceBox owner  
Joseph Marencik, JuiceBox owner  
Allen Voshall, JuiceBox owner  
Michael Brown, JuiceBox owner  
Ronald Rattie, JuiceBox owner  
Adam T Carpenter, JuiceBox owner  
Peter Yolles, JuiceBox owner  
Paul LaFlamme, JuiceBox owner  
Sean Marpo, JuiceBox owner  
Sven Thesen, JuiceBox owner  
Deron Beal, JuiceBox owner  
Jonathon Wolfe, JuiceBox owner  
Jerry Morrison, Mountain View, CA, , JuiceBox owner  
Christopher W Eldridge, JuiceBox owner  
Evan Nevermore, JuiceBox owner  
Jon Schroth, JuiceBox owner  
Tom Jones, JuiceBox Owner  
Mark R Dzmura, JuiceBox owner  
Joseph Paulsen, JuiceBox owner  
Gila Jones, JuiceBox owner  
Michael Walstrom, JuiceBox owner  
Warren Beauchamp, JuiceBox owner  
Leo R Korn, JuiceBox owner  
Jason Kates, JuiceBox owner  
Sean K. Parker, JuiceBox owner  
Marc S. Geller  
Matt Bloom  
Joseph Roberto - EV owner  
James V. Vowles  
John Ridgely