

January 14, 2026

House Technology, Economic Development, & Veterans Committee
Attn: Emily Poole
416 Sid Snyder Ave SW
Olympia, WA 98504

Re: HB 2225 – “Relating to regulation of artificial intelligence companion chatbots” (Other)

Dear Chair Ryu, Ranking Member Barnard, and Members of the House Technology, Economic Development, & Veterans Committee:

On behalf of the Computer & Communications Industry Association (CCIA), I write in an “Other” position on HB 2225 in advance of the House Technology, Economic Development, & Veterans Committee hearing on January 14, 2026. CCIA is an international, not-for-profit trade association representing a broad cross-section of communications and technology firms.¹ Proposed regulations on the interstate provision of digital services, therefore, can have a significant impact on CCIA members.

CCIA firmly believes that children are entitled to greater security and privacy online. Our members have designed and developed settings and parental tools to individually tailor younger users’ online use to their needs. For example, various services allow parents to set time limits, provide enhanced privacy protections by default for known child users, and other tools allow parents to block specific sites entirely.² While CCIA shares the goal of increasing online safety, the bill raises many concerns, as detailed below.

The bill’s subjective definitions create significant compliance uncertainty.

Many of HB 2225’s definitions are not clear enough for businesses to ensure they are in compliance. A wide range of businesses may be considered covered entities given the bill’s broad definition of “operator” as “any person, partnership, corporation, or entity that makes available, develops, or controls access to an AI companion chatbot for users in this state.” To prevent uncertainty, the definition of “AI companion chatbot” requires clarification. Open-ended and subjective phrases such as “personal or emotion-based questions” could scope in businesses that should fall outside the bill’s requirements. For example, would this apply to customer service chatbots that answer support questions, productivity tools that use conversation interfaces, or even wellness applications that respond to user prompts about goals or progress? Precise narrowing is required to focus the regulation solely on the intended targets.

¹ For more than 50 years, CCIA has promoted open markets, open systems, and open networks. CCIA members employ more than 1.6 million workers, invest more than \$100 billion in research and development, and contribute trillions of dollars in productivity to the global economy. A list of CCIA members is available at <https://www.ccianet.org/members>.

² Competitive Enterprise Institute, *Children Online Safety Tools*, <https://cei.org/children-online-safety-tools/> (last updated June 10, 2025).

Vague behavioral standards risk reduced access to information for youth.

The bill's reliance on a subjective "reasonable person" standard in Sec. 3 creates significant legal ambiguity. Because the legislation is enforced via Washington's Consumer Protection Act, as discussed below, developers face a heavy compliance burden as they attempt to insulate themselves from the risk of frivolous litigation. HB 2225 also references "manipulative engagement techniques," which are not defined. While the bill provides examples of potentially manipulative content, these examples are not exhaustive and leave developers without a clear understanding of what conduct is prohibited. Narrowing this definition and providing specific prohibited activities would give covered entities with a clearer compliance standard to comply with the bill.

Given the insufficient definitions for critical aspects of this bill, businesses will be unable to satisfactorily comply. Therefore, digital services may reasonably conclude that the safest course of action is to restrict or eliminate access for minor users, even where services may be beneficial or educational.

Enforcement through the Consumer Protection Act amplifies legal risk.

SB 2225 makes violations of the bill an "unfair or deceptive act in trade or commerce and an unfair method of competition for the purpose of applying" Washington's Consumer Protection Act, chapter 19.86 RCW. This likely exposes covered entities to enforcement actions for civil penalties based on ambiguous statutory standards. While CCIA recognizes the role of consumer protection law in addressing genuinely deceptive practices, applying this liability to vague and subjective requirements significantly amplifies legal risk. The prospect of enforcement under an already-established consumer protection framework without clear statutory guardrails may deter companies from offering or developing AI-enabled chatbots in Washington altogether. This chilling effect would disproportionately impact smaller companies and emerging technologies, reducing statewide competition and innovation.

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CCIA respectfully urges the Committee to proceed with caution and encourages a continued dialogue to ensure that any regulatory framework both prioritizes youth safety and access to innovative technologies, and stand ready to provide additional information as the Legislature continues to examine these important issues.

Sincerely,

Aodhan Downey
State Policy Manager, Western Region
Computer & Communications Industry Association