



January 9, 2026

Florida Senate  
404 S Monroe Street  
Tallahassee, FL 32399

## Re: SB 482 – "Artificial Intelligence Bill of Rights." (Oppose)

Dear Sen. Leek and Members of the Florida Senate:

On behalf of the Computer & Communications Industry Association (CCIA), I write to respectfully oppose SB 482. CCIA is an international, not-for-profit trade association representing a broad cross-section of communications and technology firms.<sup>1</sup> Proposed regulations on the interstate provision of digital services therefore, can have a significant impact on CCIA members.

While CCIA shares the Legislature's commitment to protecting consumers, minors, and prioritizing personal privacy and youth safety, SB 482 would impose an expansive and fragmented regulatory regime that risks chilling innovation, undermining free expression, and placing Florida significantly out of step with recommended federal and international approaches to artificial intelligence governance.<sup>2</sup>

### SB 482 Contains an Overly Broad and Vague Regulatory Scope

SB 482 relies on broad and imprecise definitions of "artificial intelligence," "artificial intelligence technology company," "bot," and "companion chatbot" that would encompass a vast range of common digital tools, including customer service chat functions, workplace productivity software, educational platforms, accessibility technologies, and automated moderation or safety tools. These technologies differ significantly in function, risk profile, and user interaction, yet the bill treats them as functionally equivalent.

The absence of clear, administrable boundaries makes it difficult for companies to determine whether their products fall within the scope of the bill or which obligations apply. Faced with ambiguous standards and significant penalties, providers are likely to respond by limiting features, restricting access, or withdrawing services entirely rather than attempting to interpret and comply with unclear requirements. This approach ultimately reduces consumer choice and limits access to beneficial technologies without meaningfully advancing safety or privacy objectives.

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<sup>1</sup> 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>.

<sup>2</sup> CCIA, *Understanding AI: A Guide To Sensible Governance* (June 2023), <https://ccianet.org/library/understanding-ai-guide-to-sensible-governance/>.



## Companion Chatbot Provisions in the Bill Raise Privacy and Speech Concerns

The provisions governing “companion chatbot platforms,” particularly as applied to minors, raise substantial concerns regarding privacy, speech, and proportionality. SB 482 mandates persistent disclosures, parental access to all interactions, and extensive monitoring obligations while pairing those mandates with significant civil penalties and private rights of action. These requirements create strong incentives for covered platforms to prohibit minors from accessing AI-enabled services altogether rather than risk liability.

Such an outcome would have significant unintended consequences. Many AI tools are used by minors for educational support, creative expression, skill development, and access to information. Requiring constant monitoring and disclosure of all interactions, without narrowly tailored standards or workable safe harbors, risks suppressing lawful and beneficial speech. Teenagers retain constitutional rights to access information, and regulatory frameworks that effectively force websites to over-filter or over-monitor speech raise serious First Amendment concerns.

In practice, SB 482 would push providers toward blunt, exclusionary design choices rather than encouraging thoughtful, risk-based protections tailored to specific harms.

## The Bill Contains Excessive Liability and Enforcement Mechanisms

SB 482 establishes a layered enforcement regime that includes civil penalties, punitive damages, and private causes of action triggered by “knowing or reckless” violations—standards that are undefined and highly subjective. This structure invites litigation over intent and compliance judgments rather than focusing enforcement on clearly harmful conduct.

The prospect of substantial statutory damages and litigation costs will disproportionately affect smaller companies and startups, which often lack the resources to absorb prolonged legal uncertainty. Rather than promoting compliance, this liability-heavy approach encourages defensive product design, delayed deployment, and reduced investment in new services. More balanced regulatory models prioritize clear guidance, regulator-led enforcement, and opportunities to address good-faith compliance errors before punitive penalties attach.

## Name, Image, and Likeness Provisions Would Misallocate Liability

The bill’s amendments addressing the use of an individual’s name, image, or likeness created through artificial intelligence are similarly overbroad in their allocation of liability. While it is appropriate to hold individual bad actors accountable for knowingly exploiting another person’s likeness commercially without consent, SB 482 risks extending liability to technology providers and intermediaries that lack knowledge of, or control over, how third parties use general-purpose tools.

Absent a clear actual-knowledge standard and a balanced notice-and-takedown framework, providers will be incentivized to remove lawful content or limit expressive technologies



altogether to avoid potential exposure. This approach chills protected speech, undermines creative uses of AI, and places responsibility on parties least capable of preventing misuse. Effective policy should target those who intentionally engage in deceptive or harmful conduct, rather than the tools that may be used for a wide array of lawful purposes.

## The Bill Risks Creating a Patchwork Regulatory Environment

Finally, SB 482 would contribute to a growing patchwork of state artificial intelligence laws that impose inconsistent and potentially conflicting obligations on interstate digital services. Artificial intelligence systems are developed, trained, and deployed on a national and global scale. Prescriptive state-level mandates risk becoming outdated quickly, complicating compliance, and discouraging investment in jurisdictions that adopt rigid or punitive frameworks.

Florida has long benefited from policies that promote innovation and technological growth. A fragmented regulatory approach threatens that position by making it more difficult for companies to deploy new services and features in the state.

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We appreciate consideration of these comments and stand ready to provide additional information as the Legislature considers proposals related to technology policy.

Sincerely,

Tom Mann  
State Policy Manager, South  
Computer & Communications Industry Association