



April 1, 2026

Hawaii House Committee on Judiciary and Hawaiian Affairs
Hawaii State Capitol
415 South Beretania St.
Honolulu, HI 96813

Re: SB 3001 – "Relating to Artificial Intelligence" (Oppose)

On behalf of the Computer & Communications Industry Association (CCIA), I write to Chair Tarnas, Vice Chair Poepoe, and Members of the House Committee on Judiciary and Hawaiian Affairs:

On behalf of the Computer & Communications Industry Association (CCIA), I write to respectfully oppose SB 3001. 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.

SB 3001's vague and subjective definitions would create compliance uncertainty.

The bill's definition of a "conversational artificial intelligence service" defined as, "an AI system accessible to the public that primarily simulates human conversation through textual, visual, or audio interaction," is overly broad and lacks the clarity necessary for businesses to ensure compliance. This subjective, open-ended definition risks inadvertently capturing a wide range of widely used tools that do not possess the specific capabilities the bill contemplates, such as customer service chatbots, productivity tools, wellness applications, AI tutors, language apps, and research tools. To address these concerns, CCIA suggests providing specific exemptions for these types of services and recommends that the bill revert to the more precise definition found in SB 3001 HD1.

"Conversational artificial intelligence service" or "service" means an artificial intelligence software application, web interface, or computer program that is accessible to the general public that primarily simulates human conversation and interaction through textual, visual, or aural communications. "Conversational artificial intelligence service" does not include an application, web interface, or computer program that:

- (1) Is primarily designed and marketed for use by developers or researchers;
- (2) Is a feature within another software application, web interface, or computer program that is not a conversational artificial intelligence service;
- (3) Is designed to provide outputs relating to a narrow and discrete topic;
- (4) Is primarily designed and marketed for commercial use by business entities;

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>.



(5) Incorporates a speaker and voice command interface or text interface and acts as a voice- or text- activated virtual assistant for a consumer electronic device.

(6) Is used by a business solely for internal purposes; or

(7) Is used by a business entity solely for customer service or to strictly provide users with information about available commercial services or products provided by the entity, customer service account information, or other information strictly related to its customer service.

Moreover, consumer-facing digital services have already built considerable consensus around mitigating content- and conduct-related risks to users and other parties. Most of the leading firms in industry have committed to meet best practice standards for online safety, which are embedded in a recently published 2025 international standard.²

To avoid restricting teens’ access to information, SB 3001 should regulate users under 13 rather than 18 in accordance with established practices.

SB 3001 defines “minor” as an individual less than 18. Due to the nuanced ways in which children under the age of 18 use the internet, it is imperative to appropriately tailor such treatments to respective age groups. For example, if a 16-year-old is conducting research for a school project, it is expected that they would come across, learn from, and discern from a wider array of materials than a 7-year-old on the internet playing video games. We would suggest changing the scope of covered users to be minors under the age of 13 to align with the federal Children’s Online Privacy Protection Act (COPPA) standard.³ This would also allow for those over 13, who use the internet much differently than their younger peers, to continue to benefit from its resources.

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While we share concerns about protecting child safety online, we encourage Committee members to resist advancing legislation that is not adequately tailored to this objective. We appreciate your consideration of these issues and stand ready to provide additional information as the Legislature considers proposals related to technology policy.

Sincerely,

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

² ISO/IEC 25389:2025, *Information technology – The safe framework* (Edition 1, June 2025), <https://www.iso.org/standard/90106.html>.

³ See 15 U.S.C. § 6501(1).