



April 10, 2026

Tennessee General Assembly  
425 Rep. John Lewis Way N.  
Nashville, TN 37243

## Re: HB 1898 – “Artificial Intelligence Public Safety and Child Protection Transparency Act” (Oppose)

Dear Speaker Sexton and Members of the General Assembly:

On behalf of the Computer & Communications Industry Association (CCIA), I write to respectfully oppose HB 1898. 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 intrastate provision of digital services therefore can have a significant, nationwide impact on CCIA members.

CCIA supports thoughtful, risk-based approaches to AI governance and shares the goal of ensuring that emerging technologies are developed and deployed responsibly. However, HB 1898 raises several significant concerns that could undermine innovation while failing to achieve its intended policy objectives.

### **The bill relies on outdated and overly broad “catastrophic risk” constructs.**

HB 1898 incorporates “catastrophic risk” concepts that reflect earlier legislative proposals that have since been substantially revised through stakeholder engagement. Notably, states like California and New York moved away from similar language following extensive negotiations with industry, policymakers, and experts to ensure that regulatory frameworks were more targeted and operationally feasible. Retaining these earlier constructs risks capturing a broad range of general-purpose AI systems without clear, evidence-based thresholds, creating uncertainty and overbreadth in application.

### **HB 1898 risks creating a fragmented regulatory environment.**

The bill would also increase the number 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 Prescriptive state-level mandates risk becoming outdated quickly, complicating compliance, and discouraging investment in jurisdictions that adopt rigid or punitive frameworks.

Tennessee 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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<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>.



## The bill’s approach to child safety is misaligned with how companies build products.

While CCIA supports strong protections for minors online, HB 1898 focuses on imposing design-based requirements at the model development stage, prior to deployment. In practice, many companies implement safety features, parental controls, and age-appropriate experiences at the product and service level, where tools can be more effectively tailored to specific use cases and user needs.

By mandating upstream design changes to general-purpose models, the bill may inadvertently limit the ability of developers to create flexible systems that can later be adapted into safer, age-appropriate products. This approach risks reducing the availability of services specifically designed for younger users, rather than enhancing their safety.

## The bill’s delayed preemption trigger does not mitigate its near-term harms.

HB 1898 includes a provision that would render the law null and void upon the enactment of a federal AI framework. While CCIA supports the development of a comprehensive federal approach, this provision does not address the immediate and potentially long-lasting impacts of the bill. Federal legislation in this space may take years to materialize, and in the interim, HB 1898 would impose significant compliance burdens and legal uncertainty.

Even as a temporary measure, the bill could discourage companies from investing in or deploying AI technologies in Tennessee, undermining the state’s ability to position itself as a leader in innovation and technology development.

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While we share the concerns of the sponsor and the Committee regarding the safety of young people online, we encourage Committee members to resist advancing legislation that is not adequately tailored to this objective. We appreciate your consideration of these comments and stand ready to provide additional information as you consider proposals related to technology policy.

Respectfully submitted,

Tom Mann  
State Policy Manager  
Computer & Communications Industry Association