



May 22, 2026

401 S 2nd St
Springfield IL 62701

Re: SB 316 - Artificial Intelligence Companion Model Safety Act (Oppose unless amended)

Dear Chairperson Williams and Members of the Illinois House Executive Committee:

On behalf of the Computer & Communications Industry Association (CCIA), I write to express our concerns with Senate Bill 316, Senate Amendment 2.

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. We appreciate the sponsors' interest in promoting online safety for minors and recognize the importance of ensuring that young users have age-appropriate experiences online. However, SB 316, as currently drafted, raises significant concerns regarding unintended impacts on services not reasonably associated with harms to minors, increased privacy risks, and an expansive enforcement structure that could create substantial compliance and litigation uncertainty.

Limited exemptions create unintended scope

SB 316 defines “artificial intelligence companion” as an AI system designed to simulate an ongoing human-like relationship by retaining user information to personalize interactions, asking unsolicited emotion-based questions, and engaging in continuing conversations about personal matters. The bill lists AI systems to be exempted from these regulations, but the scope still includes numerous online services that do not meaningfully implicate the concerns the legislation seeks to address, including business-to-business services, enterprise communications tools, workplace collaboration platforms, customer relationship management software, productivity applications, cloud infrastructure services, and other professional or operational technologies.

We recommend adding additional exemptions to better align with other state social media and age assurance laws, including exemptions for services primarily made available and marketed for use by developers or researchers, features embedded within other software applications that are not conversational AI services, systems intended to provide outputs relating to a narrow and discrete topic, and services made available and marketed for commercial use by business entities. These clarifications would help ensure the bill remains narrowly tailored to its intended purpose while avoiding unintended consequences for businesses and consumers.

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>.



Constructive knowledge standard incentivizes invasive data collection

The bill stipulates an operator may be considered to know that a user is a minor based on any information or marketing or product-development inference it has about the user’s age from any source, including the age provided when creating an account, the user identifying their age in chats or interactions accessible to the operator, or any age the operator assigns or associates with the user for purposes such as marketing, advertising, or product development. This creates substantial legal uncertainty and incentivizes platforms to engage in invasive data collection and age verification practices in order to avoid liability.

We recommend that the bill incorporate an actual knowledge standard for covered entities. An actual knowledge framework would provide clearer compliance obligations, reduce incentives for unnecessary age verification and data collection practices, and better align with constitutional considerations and approaches adopted in other states.

Excessive enforcement authority creates compliance uncertainty

Finally, we remain concerned with the bill’s expansive enforcement structure, including incorporation into the Illinois Consumer Fraud and Deceptive Business Practices Act, the authority granted to State’s Attorneys, and the creation of a private right of action for actual damages. Allowing multiple enforcement pathways and decentralized authority creates a substantial risk of inconsistent interpretations, duplicative investigations, and regulatory uncertainty. In addition, private litigation in a technically complex and evolving area of law will create an uncertain legal environment that discourages the development and deployment of innovative artificial intelligence products and services.

Given the technical complexity and evolving nature of artificial intelligence systems, enforcement authority should be centralized within the Illinois Attorney General’s office to promote uniformity, consistency, and predictability. We also recommend removing the private right of action under the Consumer Fraud and Deceptive Business Practices Act.

We have attached proposed redline amendments that would address these concerns and improve the legislation’s clarity and workability. We respectfully urge the Committee to consider these changes before advancing the bill further.

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CCIA remains committed to working collaboratively with lawmakers on policies that protect minors online while preserving innovation, constitutional rights, and access to beneficial digital services.

Thank you for your consideration. Please do not hesitate to contact us with any questions.

Sincerely,

Megan Stokes
State Policy Director
Computer & Communications Industry Association