



June 4, 2026

James Kirkwood
New York Associate General Counsel, Minority
Legislative Office Building
198 State Street, Albany, NY 12247

Re: S 9051/A 10379 – “Prohibition on Unsafe Chatbot Features for Minors” (Oppose)

Dear Associate General Counsel Kirkwood:

On behalf of the Computer & Communications Industry Association (CCIA), I write to respectfully oppose S 9051/A 10379 and request the bill be laid aside. CCIA is an international, not-for-profit trade association representing a broad cross-section of communications and technology firms.¹ Proposed regulations on the intrastate provision of digital services, therefore, can have a significant, nationwide impact on CCIA members.

CCIA firmly believes that children are entitled to security and privacy online. Our members have designed and developed parental tools to individually tailor younger users’ online use to their developmental 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 the following concerns:

S 9051/A 10379’s vague and subjective definitions would create compliance uncertainty and create a chilling effect on beneficial AI for youth.

Many of the bill’s definitions are not clear enough for businesses to ensure they are in compliance. For example, the bill broadly defines “unsafe chatbot features” to include outputs that “simulate companionship or an interpersonal relationship with a user.” This open-ended, subjective definition risks scoping in businesses such as customer service chatbots that answer support questions, productivity tools that use conversation interfaces, wellness applications that respond to user prompts about goals or progress, and other products and services without the capabilities this bill contemplates.

Even if limited to “advanced chatbots”, which is defined in the bill as “a generative artificial intelligence system with a natural language interface, including via writing or sound, that provides ongoing, adaptive responses to users”, the definitions remain broad enough to capture widely used conversational interfaces, including AI tutors, language apps and research tools.

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).



Similarly, it is difficult to objectively determine when a given output meets many of the listed criteria, such as “prioritiz[ing] flattery or sycophancy with the user over the user’s safety”, using “matters personal to the user”, “simulat[ing] companionship or an interpersonal relationship”, and many others. These vague terms do not allow businesses to determine in advance whether their products and services comply with the law (note also that the restrictions on generating “encouragement... to self-isolate” could prohibit models from generating basic public health warnings). Precise narrowing is required to focus any regulation solely on the intended targets.

Also, there will be a chilling effect on beneficial AI for youth. For instance, the broad prohibition on emotional expression, personalization, and relationship-simulation features would effectively eliminate AI tutoring with adaptive personalization, creative writing, and special education tools that use emotional engagement to motivate learners. Moreover, the bill as drafted could push minors toward unregulated alternatives, such as foreign-operated AI companions outside U.S. jurisdiction or underground/gray-market AI companion services.

To avoid restricting teens’ access to information, S 9051/A 10379 should regulate users under 13 rather than 18 in accordance with established practices.

S 9051/A 10379 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.

S 9051/A 10379 conflicts with New York’s recently enacted AI companion model law.

New York just enacted an AI companion model law that addresses chatbot safety concerns, effective as of November 2025.⁴ S 9051/A 10379 completely ignores that existing framework and instead proposes an unworkable ban. New York should focus on refining proven models for age-appropriate, transparent experiences, not on scrapping good-faith safety work in favor of a regressive, technology-banning framework. S 9051/A10379 creates a separate, conflicting layer of regulation before the impact of the existing law can even be measured, creating an unstable environment for New York’s tech economy. This could lead to a competitive disadvantage for NY-based AI companies.

Furthermore, consumer facing digital services have already built considerable consensus around mitigating content- and conduct-related risks to users and other parties. Most of the

³ See 15 U.S.C. § 6501(1).

⁴ N.Y. Gen. Bus. Law § 1700 (2025).



leading firms in industry have committed to meet best practice standards for online safety which are embedded in a recently published 2025 international standard.⁵

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While we share concerns about protecting child safety online, we encourage the legislature 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,

Kyle J. Sepe
State Policy Manager, Northeast Region
Computer & Communications Industry Association

⁵ ISO/IEC 25389:2025, *Information technology – The safe framework* (Edition 1, June 2025), <https://www.iso.org/standard/90106.html>.