



June 5, 2026

Honorable JB Pritzker
401 S Spring St
Springfield IL 62701

Re: SB 315- Artificial Intelligence Safety Measures Act (Veto Request)

Dear Governor Pritzker:

On behalf of the Computer & Communications Industry Association (CCIA), I write to respectfully request a veto of SB 315.

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 support thoughtful and workable approaches to artificial intelligence governance that promote trust, accountability, and innovation. However, the audit requirements contemplated in SB 315 raise significant practical and implementation concerns that should be addressed before moving forward.

SB 315 requires that, beginning on January 1, 2028, a large frontier developer must annually retain an independent third party to perform an audit of compliance with the requirements in this bill. Audits would be required to follow generally accepted auditing standards and best practices, and auditors are required to possess “demonstrated competence to perform the audit, including experience employing or contracting with individuals who possess technical expertise in the safety of frontier models.”

However, no credible or standardized ecosystem currently exists to conduct the type of independent audits envisioned under the legislation. At present, there are no broadly recognized certification standards, licensing structures, or established oversight mechanisms for entities seeking to perform AI compliance audits. As drafted, the bill would effectively require companies to comply with a process for which the State has not yet established the necessary infrastructure, standards, or qualified evaluators.

Without a clearly defined and trusted framework, these audit requirements risk becoming process for process’s sake rather than producing meaningful consumer protection or accountability outcomes. In practice, this could create inconsistent evaluations, uncertainty for regulated entities, and significant compliance burdens without corresponding public benefit.

We believe Illinois should instead take a more deliberate and evidence-based approach similar to the model recently adopted in Virginia² and Connecticut³. That approach appropriately

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 <https://lis.virginia.gov/bill-details/20261/SB384/text/CHAP0426>

³ <https://www.cga.ct.gov/2026/ACT/PA/PDF/2026PA-00015-R00SB-00005-PA.PDF?m5t7dwzwr>



recognizes that states must first assess whether a viable system for independent AI verification even exists before imposing mandatory audit obligations.

Specifically, Virginia's enacted language directs the Department of Innovation and Technology to evaluate the feasibility and impact of developing a framework for independent verification organizations that would assess AI systems against standards designed to prevent personal injury and property damage. The study further examines:

- the nature and magnitude of AI-related risks;
- whether measurable and objective metrics currently exist;
- existing technical and operational standards;
- methodologies used to evaluate mitigation measures;
- approaches employed by other states; and
- the fiscal and administrative impact of overseeing such a system.

Importantly, the Virginia legislation also directs the Department to assess the feasibility of establishing a licensing scheme for independent verification organizations and whether a state agency could appropriately oversee such a system.

CCIA believes this type of measured approach is a far more responsible path forward. Before Illinois mandates audits, the State should first determine:

1. whether qualified and credible auditors exist;
2. what standards those auditors would apply;
3. how consistency and accountability would be ensured; and
4. whether a state licensing or certification structure is necessary.

Absent those foundational elements, the proposed audit requirements are premature and could unintentionally hinder innovation while failing to achieve their intended policy objectives. At a minimum, Illinois should first study the feasibility of establishing standards, oversight mechanisms, and qualified independent verification entities before imposing mandatory audit obligations.

* * * * *

Thank you for your consideration. We appreciate the opportunity to share our concerns and stand ready to work with your office and the General Assembly on workable and effective AI policy solutions.

Sincerely,

Megan Stokes
State Policy Director
Computer & Communications Industry Association