



Memorandum in Opposition to Rhode Island HB 8052

March 24, 2026

On behalf of PRA Group, Inc. and its wholly-owned subsidiaries (collectively, "PRA"), I am writing in **opposition to Rhode Island House Bill 8052 ("RI HB 8052")**. The legislation establishes a new legal framework that holds developers of artificial intelligence ("AI") systems liable for injuries caused by their AI. While PRA applauds the legislature for its efforts to ensure that AI developers are held accountable for the consequences of their systems, as currently drafted, the bill is overly broad and may have unintended consequences in covering parties that are likely not the intended targets of the legislation.

PRA is a publicly-traded global company, headquartered in Norfolk with over 800 employees in Virginia, that, through its subsidiaries, purchases portfolios of consumer receivables from major banks, and then partners with individuals as they repay their obligations, working toward financial recovery. We are a leader in the nonperforming loan industry and take our leadership obligations within our industry seriously. We work with consumers to resolve their obligations and typically offer a discount on the face value of the debt. In addition, we typically charge no pre-judgment interest or fees on debt we purchase domestically. PRA is also a willing participant in any action that combats unethical consumer practices and those actions in harming both consumers and legitimate businesses.

Among other things, RI HB 8052 aims to create a clear legal framework for addressing injuries caused by AI systems, potentially influencing how AI products are designed, tested, and deployed. To that end, the bill establishes a new legal framework that holds developers of AI systems liable for injuries caused by their AI. The bill emphasizes that liability can arise when injuries are factually and proximately caused by conduct that would meet negligence or intentional tort standards if performed by a human. PRA agrees that AI developers must be held accountable for the consequences of their systems, but the act should be tailored to apply to AI development of high-risk applications, such as frontier models.

The bill seems intended to impact industries involved in AI development, software engineering, and related technology; however, it is not strictly limited to these sectors leaving the bar to assert negligence against non-industry and technology companies extremely low. In this way, the bill



may be abused by predatory plaintiff's attorneys and create a hostile environment for business development and innovation.

AI laws should apply only to systems making material decisions that directly affect consumers' financial well-being, health, safety, employment, insurance, housing, education, or access to public services. Routine or convenience-focused tools such as content recommendations, targeted advertising, or customer service should remain outside the scope of AI laws or regulations. Legislation should distinguish between true AI systems that learn, adapt, and make predictive decisions, and simple automation technologies such as robotic process automation (RPA), logic trees, or data dashboards. Conflating the two risks would be punishing businesses for using basic efficiency tools while failing to address the unique risks of AI.

For the reasons noted above, we respectfully urge you to **amend RI HB 8052 before considering any final passage.**

Best regards,

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