

April 1, 2026

The Honorable Victoria Gu, Chair
Senate Artificial Intelligence & Emerging Technology Committee
Rhode Island General Assembly

Re: SB 2195 – Artificial Intelligence Companion Models

Dear Chair Gu and members of the Committee:

TechNet is the national, bipartisan network of technology companies that promotes the growth of the innovation economy by advocating a targeted policy agenda at the federal and 50-state level. TechNet’s diverse membership includes 100 dynamic American businesses ranging from startups to the most iconic companies on the planet and represents five million employees and countless customers in the fields of information technology, artificial intelligence, e-commerce, the sharing and gig economies, advanced energy, transportation, cybersecurity, venture capital, and finance.

TechNet shares the Committee’s commitment to protecting Rhode Islanders and ensuring emerging technologies are deployed responsibly. We appreciate the intent behind SB 2195 to ensure that “AI companion” products address self-harm and safety risks and provide clear disclosures to users. However, as drafted, SB 2195 raises significant legal and practical concerns, and would benefit from targeted amendments to improve clarity, avoid unintended scope, and reduce litigation-driven compliance risk while still advancing the bill’s safety goals.

S 2195’s definitions are overly broad and risk sweeping in low-risk tools.

S 2195 defines “AI companion” broadly to include systems that simulate social human interaction by retaining information on prior interactions and user preferences, asking questions, providing advice, and engaging in simulated conversation on matters of personal well-being, while only carving out certain customer-service tools.

As drafted, the definition may unintentionally capture low-risk or general-purpose systems not designed or marketed as “companions,” including tools used for research, technical assistance, or internal employee productivity. To avoid unintended consequences and preserve innovation, TechNet encourages the Committee to refine the definition to include additional, clear exclusions for these low-risk use cases, consistent with approaches taken in other states.

The bill’s mandated “protocol” requirements should be standards-based and align with existing models.

SB 2195 would make it unlawful to offer an AI companion unless it “contains a protocol” for addressing possible suicidal ideation or self-harm, possible physical harm to others, and possible financial harm to others, including referrals to crisis services.

TechNet supports reasonable, safety-focused protocols—particularly for self-harm and crisis scenarios. But the bill would be more workable and effective if it:

- used a “reasonable efforts” standard for detecting and responding (rather than an absolute mandate), and
- removed or clarified the reference to “financial harm,” which is not defined and could create uncertainty about what is required and when.

We also encourage the Committee to align this section as closely as practicable with established frameworks (including the New York Companions Act), which can improve clarity and facilitate compliance.

The disclosure requirement is overly prescriptive and may be vulnerable to constitutional challenge.

SB 2195 requires a repeated notice—at the beginning of an interaction and at least every three hours thereafter—stating in specified formatting that the AI companion is a computer program and not a human being and is unable to feel human emotion.

TechNet supports ensuring users understand they are interacting with an AI system. However, overly prescriptive compelled speech requirements (including mandated wording, formatting, and repetition) can raise First Amendment compelled speech concerns, particularly where less restrictive, standards-based disclosures could achieve the same consumer-protection objective. Courts often require compelled disclosures to be factual, noncontroversial, and reasonably related to preventing deception—and overly rigid mandates can create legal risk and implementation challenges.

A preferable approach is to require a “clear and conspicuous” notice, appropriate to context (text, audio, or visual), rather than fixed formatting and exact language. This would preserve the bill’s goal while reducing constitutional and practical risk.

The private right of action would encourage litigation over technical compliance.

SB 2195 allows private lawsuits by individuals claiming physical injury through self-harm, or physical/financial harm caused by another, due to a violation—alongside Attorney General enforcement.

This structure can incentivize costly litigation over disputed causation and technical compliance, diverting resources away from safety improvements. TechNet recommends removing the private right of action and providing for exclusive Attorney General enforcement, which can ensure consistent oversight and prioritization of serious harms.

For these reasons, TechNet respectfully urges the Committee to amend SB 2195 to: (1) narrow and clarify scope; (2) adopt reasonable, standards-based safety and disclosure requirements; and (3) remove the private right of action in favor of Attorney General enforcement. These changes would better advance the bill's safety objectives while reducing legal uncertainty and unintended consequences.

Thank you for your consideration. Please feel free to contact me with any questions.

Sincerely,



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