



MOTION PICTURE ASSOCIATION

February 27, 2026

Maryland House Committee on Economic Matters

Miller Senate Office Building

11 Bladen St.

Annapolis, Maryland 21401

Re: HB 1250 – Artificial Intelligence Chatbots – MPA Letter in Opposition

Dear Members of the House Committee on Economic Matters:

On behalf of the Motion Picture Association, Inc. (“MPA”),¹ I am writing to express our opposition to HB 1250 (the “Bill”), a bill concerning artificial intelligence chatbots. The Bill uses an overbroad definition of “chatbot” that would apply to an array of services that should not be covered by the onerous provisions in the Bill. The Bill would apply to customer service chatbots and chatbots that are licensed by companies for internal productivity and business uses. Like many companies, MPA’s members use these chatbot tools in the ordinary course of business and would be impacted by the regulations in this Bill. The Bill’s overbroad term would also apply to narrow-purpose chatbots that might be used in connection with film and television characters. None of these uses present the same sort of concerns raised by stand-alone, wide-ranging, and pseudo-human interactions that companion chatbots may present—and MPA seeks amendments to narrow the focus of chatbot regulation to these sorts of services.²

As drafted, his Bill imposes numerous requirements on the “developer” or “operator” of any “chatbot.” Entities must perform monthly “safety testing” (which is not defined) and publicly post “findings” of such testing. Every chatbot must have “warnings” that they are AI-generated continuously appear on a user’s screen (and which requires an affirmative response from the user routinely throughout a chat session). And the Bill imposes restrictions on the use of certain data as

¹ The MPA serves as the global voice and advocate of the motion picture, television, and streaming industries. It works in every corner of the globe to advance the creative industry, protect its members’ content across all screens, defend the creative and artistic freedoms of storytellers, and support innovative distribution models that expand viewing choices for audiences around the world. The MPA’s member studios are Netflix Studios, LLC; Paramount Pictures Corporation; Prime Amazon MGM Studios; Sony Pictures Entertainment Inc.; Universal City Studios LLC; Walt Disney Studios Motion Pictures; and Warner Bros. Entertainment, Inc.

² HB 952 provides a more tailored approach to companion chatbot regulation and would be a preferred vehicle for chatbot regulation in Maryland. That said, as explained in MPA’s letter in connection with that legislation, we would seek some further clarification in the definition of that Bill as well.

“training data” (which is not defined) for the chatbot and for advertising purposes (regardless of whether the user consents), as well as prohibitions on retaining data (while nevertheless requiring operators to provide a mechanism for every user to review their chat log data), and on profiling users or providing “advice or a service” that cannot be “lawfully provide[d] without a license.”

Most critically, MPA seeks an amendment to define chatbots with a focus on those that offer companion-style interactions, with clearly identified exemptions for the kinds of uses described above.

“CHATBOT” MEANS A SYSTEM USING ARTIFICIAL INTELLIGENCE, GENERATIVE ARTIFICIAL INTELLIGENCE, AND/OR EMOTIONAL RECOGNITION ALGORITHMS DESIGNED TO STIMULATE A SUSTAINED HUMAN OR HUMAN-LIKE RELATIONSHIP WITH A USER BY:

A. RETAINING INFORMATION ON PRIOR INTERACTIONS OR USER SESSIONS AND USER PREFERENCES TO PERSONALIZE THE INTERACTION AND FACILITATE ONGOING ENGAGEMENT WITH THE AI COMPANION;

B. ASKING UNPROMPTED OR UNSOLICITED EMOTION-BASED QUESTIONS THAT GO BEYOND A DIRECT RESPONSE TO A USER PROMPT; AND

C. SUSTAINING AN ONGOING DIALOGUE CONCERNING MATTERS PERSONAL TO THE USER.

“CHATBOT” DOES NOT INCLUDE ANY OF THE FOLLOWING:

(A) A PRODUCT THAT IS USED EXCLUSIVELY FOR CUSTOMER SERVICE, A BUSINESS'S INTERNAL OPERATIONS, OR TECHNICAL ASSISTANCE.

(B) A PRODUCT THAT IS DIRECTLY RELATED TO VIDEO GAME, MOTION PICTURE, TELEVISION PROGRAM, STREAMING PROGRAM OR OTHER AUDIOVISUAL WORK, OR THEME PARK OR LOCATION-BASED EXPERIENCE, INCLUDING A COMBINATION OF ANY SUCH WORKS AND EXPERIENCES, PROVIDED THAT THE PRODUCT IS TECHNICALLY RESTRICTED TO CONTENT DIRECTLY RELATED TO THE AUDIOVISUAL WORK, THEME PARK OR LOCATION-BASED EXPERIENCE AND CANNOT DISCUSS TOPICS RELATED TO MENTAL HEALTH, SELF-HARM, SUICIDE, OR SEXUALLY EXPLICIT CONDUCT.

(C) A STAND-ALONE CONSUMER ELECTRONIC DEVICE THAT FUNCTIONS PRIMARILY AS A SPEAKER AND VOICE COMMAND INTERFACE, ACTS AS A VOICE-ACTIVATED VIRTUAL ASSISTANT, AND DOES NOT SUSTAIN A RELATIONSHIP ACROSS MULTIPLE INTERACTIONS OR GENERATE OUTPUTS DESIGNED TO ELICIT EMOTIONAL ATTACHMENT IN THE USER.

A definition like the above would focus the Bill on the type of companion chatbot services that appear to be the target of the regulation, without unduly interfering with business uses of chatbot services, or narrowly focused chatbots that do not facilitate sustained human-like engagement.

Further, this Bill seeks to modify consumer privacy and data restrictions overtop the rules that just went into effect in October 2025, with the passage of the Maryland Online Data Privacy Act

(MODPA). These provisions create a uniquely cumbersome consumer data regulatory regime for chatbots—often imposing restrictions regardless of whether a consumer consents to the processing of particular data. When coupled with certain vague, undefined, and overbroad requirements, these restrictions are unnecessary—and the regulations should instead be focused on issues specific to chatbots, such as disclosure requirements, or like the self-harm and sexually explicit content restrictions that appear in HB 952.

MPA is available to discuss this Bill and potential language to address these concerns at your convenience. Please contact Renata Colbert (Renata_Colbert@motionpicturs.org) or Nick Manis (nmanis@maniscanning.com) with any questions about the Bill or MPA’s proposed amendments.

Sincerely,

Renata Colbert
Director, State Government Affairs
MPA

* * * *