



March 26, 2026

The Honorable Pamela Beidle
Chair
Committee on Finance
Room 3 East Wing, Miller Senate Office Building
11 Bladen Street
Annapolis, MD 21401-1991

RE: Oppose HB 952 - Consumer Protection – Companion Chatbots – Regulation

Dear Chair Beidle and members of the Committee,

On behalf of Chamber of Progress, a tech industry association supporting public policies to build a society in which all people benefit from technological advances, **I respectfully urge you to oppose HB 952**, which would broadly restrict AI chatbot tools in ways that risk limiting access to proven educational resources and responsibly deployed learning supports.

HB 952's definition of "companion chatbot" is broad enough to capture low-risk and educational AI tools

HB 952 defines a "companion chatbot" as an AI system with a natural language interface that provides adaptive, human-like responses and is "capable of meeting a user's social needs, including by exhibiting anthropomorphic features and being able to sustain a relationship across multiple interactions." While the bill excludes customer service bots, video game bots, and voice-activated virtual assistants, these carveouts are narrow and leave out a wide range of low-risk and educational tools that were not the apparent focus of legislative concern.

For example, an AI tutor that asks follow-up questions to help a student solve a math problem, or a language-learning chatbot that practices conversational skills across sessions, could fall within the bill's scope. These tools use natural language interfaces, provide adaptive responses, and sustain relationships across multiple interactions. If a student develops a sense of rapport with an AI learning companion, a regulator could reasonably argue the tool is "capable of meeting a user's social needs," even if that was never its primary purpose.

This is particularly concerning given that a 2025 peer-reviewed meta-analysis of 62 studies found that chatbots generally have a positive effect on learning performance, especially in STEM subjects, at lower educational levels, and when used over longer durations.¹ Recent survey data reinforces this point: just over half of U.S. teens report using chatbots for help with schoolwork, and more teens say they think AI will be positive for them than negative.² Overinclusive definitions risk curtailing tools that independent research shows are supporting student learning outcomes and that young people are already using productively.

Although the amended bill adds additional exclusions, including for bots embedded within broader applications and certain business-use systems, those exclusions are conditioned on the chatbot not generating content related to sensitive topics and not eliciting emotional responses. Because many educational tools involve open-ended conversation or may respond to user inputs that touch on sensitive topics, these conditions do not clearly exclude common learning or tutoring applications, leaving continued ambiguity about whether they fall within scope.

This ambiguity underscores a broader concern: **the bill's definition remains overly broad and risks sweeping in widely used educational and productivity tools that were never the intended target of regulation.**

Rather than addressing this overbreadth, the amended bill expands the scope of regulation in ways that increase the risk of unintended consequences for beneficial AI tools.

HB 952 effectively pushes AI services toward age verification and increased data collection

HB 952 conditions several obligations on whether a provider "knows or reasonably should know" a user is a minor, including requirements to block sexually explicit content³ and to display usage-time warnings after three hours of consecutive use.⁴ Although the bill does not explicitly require age verification, it places age determination at the center of compliance. Operators that cannot distinguish minors from adults face enforcement risk under the Maryland Consumer Protection Act for failing to apply minor-specific protections. In practice, that means more age gates, age screening, or identity checks for all users.

¹ Martin Laun and Fabian Wolff. *Chatbots in education: Hype or help? A meta-analysis*. ScienceDirect, Apr. 2025. <https://www.sciencedirect.com/science/article/pii/S1041608025000226>

² Pew Research Center. "How Teens Use and View AI." Feb. 24, 2026. <https://www.pewresearch.org/internet/2026/02/24/how-teens-use-and-view-ai/>

³ HB 952, Section 14-1330(C).

⁴ HB 952, Section 14-1330(E).

There are a number of other concerns with pushing services toward age verification. Strict age verification that confirms a user's age without collecting additional personally identifiable information is not technically feasible while still respecting users' rights, privacy, and security.⁵ This approach threatens online privacy for everyone. To avoid legal risk, companies would be incentivized to collect age or identity information from all users, increasing data collection rather than reducing it.

As a result, providers are likely to collect additional personal information to distinguish minors from adults, including behavioral profiling or identity-based checks requiring sensitive government documents. This shifts AI services away from privacy-preserving, data-minimizing design and toward systems that retain more user data than would otherwise be necessary.

The amended bill also significantly expands the warning requirements by requiring both a persistent on-screen disclosure and repeated pop-up warnings at the start of use and after every hour of continuous interaction. While periodic reminders, such as the original three-hour break notification for minors, strike a reasonable balance, shifting to hourly interruptions risks undermining the user experience. For students and other users engaging in sustained learning or problem-solving, these frequent disruptions may break concentration, reduce usability, and ultimately make these tools less effective as educational supports.

The Committee should consider a more deliberate approach to companion chatbot regulation

HB 952 addresses legitimate concerns, but companion chatbot regulation is a novel and fast-moving area where prescriptive requirements risk locking in rules that do not reflect the state of the technology. The General Assembly established an AI Working Group last session that has not yet had the opportunity to convene and study these issues. The Committee should consider allowing the Working Group to develop informed recommendations before advancing detailed compliance mandates. If the bill does move forward, aligning its framework more closely with California's companion chatbot law, which HB 952 appears to be modeled on, would reduce compliance fragmentation for operators serving users across multiple states and give Maryland the benefit of an already-tested approach.

For these reasons, **I respectfully urge you to oppose HB 952.** By sweeping in low-risk educational uses and discouraging responsible innovation, the bill would reduce access to tools that independent research and real-world usage show are helping students learn and succeed, without meaningfully improving safety.

⁵ Sarah Forland et al. *Age Verification: The Complicated Effort to Protect Youth Online*. Open Technology Institute, New America, Apr. 22, 2024.
<https://www.newamerica.org/oti/reports/age-verification-the-complicated-effort-to-protect-youth-online/>

Sincerely,

A handwritten signature in black ink, appearing to read "Brianna January". The signature is fluid and cursive, with the first name being more prominent.

Brianna January

Director of State & Local Government Relations, Northeast US