



# MOTION PICTURE ASSOCIATION

March 9, 2026

Maryland Senate Committee on Finance

Miller Senate Office Building

11 Bladen St.

Annapolis, Maryland 21401

**Re:** SB 827 – Artificial Intelligence Chatbots – MPA Letter in Opposition

Dear Members of the Senate Finance Committee:

On behalf of the Motion Picture Association, Inc. (“MPA”),<sup>1</sup> I am writing to express our opposition to SB 827 (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 would also apply onerous and impractical requirements on narrow-purpose chatbots that might be used in connection with film and television characters. MPA is providing a proposed amendment to ensure the legislation targets the kind of higher risk chatbot services that offer general-purpose, pseudo-human interactions.<sup>2</sup>

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 “training data” (which is not defined) and for advertising purposes (regardless of whether the user

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<sup>1</sup> 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 Amazon Studios, LLC; Netflix Studios, LLC; Paramount Pictures Corporation; Sony Pictures Entertainment Inc.; Universal City Studios LLC; Walt Disney Studios Motion Pictures; and Warner Bros. Entertainment, Inc.

<sup>2</sup> 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.

consents), requires operators to provide a mechanism for every user to review their chat log data, and limits “profiling” users, among other requirements.

These provisions may be appropriate for high-risk chatbot services, but they do not make sense when applied to the full panoply of chatbot tools. There is little need for a business productivity tool to have repeated disclosures reminding a company’s employees that it is a chatbot—let alone require a user response each time. Nor does it make sense for such in-house tools to conduct monthly “safety testing” and post *public findings* of such testing. The same is true for limited-purpose chatbots and customer service tools, as these tools are not likely to be associated with the harms contemplated by such safety testing. Additionally, the restrictions on “profiling” users could prevent a business productivity chatbot from determining ways to better assist an employee. *See* Section 14-5104(A)(3). And for a chatbot provided in connection with a film or television show, the restrictions on using a chat log for advertising purposes could prevent the service from responding to a user’s own prompts about an upcoming film or providing information on how to purchase tickets to view a film. *See* Section 39-80-20(A)(2). The Bill also requires operators to establish a mechanism for every user to *download* their chat history—which would require every chatbot operator, including customer service and business productivity tools, to set up user accounts and store data about each user, even if such services do not currently have such infrastructure in place. *See* Section 14-5106.

MPA proposes an amendment that targets the kinds of services where the restrictions imposed would be more appropriate, while avoiding unintended burdens on low-risk chatbot tools:

*(E) “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:*

- 1.. RETAINING INFORMATION ON PRIOR INTERACTIONS OR USER SESSIONS AND USER PREFERENCES TO PERSONALIZE THE INTERACTION AND FACILITATE ONGOING ENGAGEMENT WITH THE AI COMPANION;*
- 2. ASKING UNPROMPTED OR UNSOLICITED EMOTION-BASED QUESTIONS THAT GO BEYOND A DIRECT RESPONSE TO A USER PROMPT; AND*
- 3. SUSTAINING AN ONGOING DIALOGUE CONCERNING MATTERS PERSONAL TO THE USER.*

*“CHATBOT” DOES NOT INCLUDE ANY OF THE FOLLOWING:*

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

*(2) 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.*

*(3) 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.

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](mailto:Renata_Colbert@motionpicturs.org)) or Nick Manis ([nmanis@maniscanning.com](mailto:nmanis@maniscanning.com)) with any questions about the Bill or MPA's proposed amendments.

Sincerely,

*Renata Colbert*

Renata Colbert  
Director, State Government Affairs  
MPA

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