March 26, 2026

The Honorable Matt D. Klein
Chair, Senate Commerce and Consumer Protection Committee
2105 Minnesota Senate Bldg.
St. Paul, MN 55155

The Honorable Judy Seeberger
Vice Chair, Senate Commerce and Consumer Protection Committee
2109 Minnesota Senate Bldg.

CC: Members of the Senate Commerce and Consumer Protection Committee

RE: SF 1857 – Minor access to chatbots for conversational purposes

Dear Chair Klein, Vice Chair Seeberger, and Members of the Committees,

On behalf of CTIA®, the trade association for the wireless communications industry, I respectfully write regarding HB 1782, relating to artificial intelligence for the protection of minors. While CTIA shares the goals of protecting minors from manipulative, deceptive, and harmful AI systems, the amended bill's definition of "chatbot" remains broad enough to create significant compliance uncertainty for businesses that deploy AI tools strictly for customer service purposes. We respectfully request a clarifying amendment to the definition of "chatbot" to ensure that these tools are not inadvertently swept into the bill's scope.

AI customer service technologies help wireless companies ensure positive service experiences by providing 24/7 access, faster assistance, and more accurate call routing. These tools are fundamentally different in nature and purpose from the AI companion systems this bill is designed to address. As amended, however, the bill defines "chatbot" to include any generative AI system that "behave[s] in a way that would lead a reasonable person to believe the chatbot is conveying that it has humanity, sentience, emotions, or desires." That standard is highly subjective and could be applied to virtually any conversational AI interface — including those deployed by businesses solely to assist customers with account inquiries, billing questions, and service information. A customer service chatbot that uses natural, friendly language, could be characterized as conveying emotion. Efforts to protect minors from potentially harmful AI experiences should be more precisely focused on those systems designed to simulate human relationships — not the customer facing tools that businesses and consumers rely on every day.

The bill's amended focus on AI companion systems is a great start, and CTIA appreciates the committee's work in narrowing the bill's scope. As the bill stands, businesses would continue to face uncertainty about whether their customer-facing AI tools — which pose no material risk of harm to minors — are subject to the bill's compliance obligations and civil penalties.

We respectfully request that the definition of "chatbot" be further amended to exclude AI systems used by a business entity solely for customer service or to provide users with information about the entity's available commercial services or products, customer account information, or other information strictly related to its customer service functions. This would preserve the bill's focus: on AI companion systems and conversational AI services designed to simulate human emotion. It ensures that businesses deploying AI strictly for customer service purposes — account inquiries, billing questions, product information, and similar functions — are not subject to compliance requirements and penalties designed for an entirely different category of AI. Rather than imposing sweeping obligations on all chatbot operators, this targeted approach addresses the genuine documented harms the legislature has identified without burdening the customer service tools, productivity assistants, and informational chatbots that Minnesota businesses and consumers rely on every day.

For these reasons, we request that the bill be further amended to address the concerns identified above and that it not move forward in its current form. We look forward to working with you on these suggested amendments. Thank you for the opportunity to raise our concerns and for your consideration.

Sincerely,



Jake Lestock
Director, State Legislative Affairs