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April 15, 2026

The Honorable Matt Klein
Chair, Minnesota Senate Committee on Commerce and Consumer Protection
658 Cedar Street
St. Paul, MN 55155

The Honorable Gary Dahms
Ranking Minority Member, Minnesota Senate Committee on Commerce and Consumer Protection
658 Cedar Street
St. Paul, MN 55155

Re: SF 4365 - Omnibus Commerce Bill – Concerns Regarding Youth Chatbot Provision

Dear Chair Klein, Ranking Member Dahms, and Members of the Committee:

I write to express TechNet's opposition to the youth chatbot provision included in the Senate omnibus commerce bill (SF 4365), which would impose new restrictions on minors' access to chatbot technologies.

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

We appreciate the author's efforts to address stakeholder concerns by refining definitions. While the changes are a step in the right direction, the provision continues to raise significant concerns regarding scope, implementation, and unintended consequences.

First, because of the age prohibition, even with revised definitions the provision will apply broadly to general-purpose AI systems that are inherently multifunctional and context-dependent. Chatbot technologies are widely used across a range of everyday applications, including educational tools, productivity platforms, and general information services. As currently drafted, the provision risks sweeping in these common and beneficial uses rather than being narrowly tailored to specific high-risk applications.

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Second, the provision creates significant operational challenges by requiring platforms to verify user age and apply restrictions across dynamic, user-driven interactions. General-purpose AI systems cannot reliably distinguish between different types of use cases in real time, and imposing such requirements would be difficult to implement consistently across services. This creates uncertainty for both platforms and users and raises concerns about feasibility.

Importantly, the age verification requirements themselves present additional concerns. Verifying the age of users in a reliable and privacy-protective manner remains a complex and unresolved challenge. Many approaches require the collection of sensitive personal information, which introduces new privacy and data security risks—particularly for minors. Additionally, rigid or prescriptive verification mandates may conflict with existing federal frameworks that allow for flexible, risk-based approaches, and could impose disproportionate burdens on smaller developers who lack the resources to build or procure sophisticated verification systems.

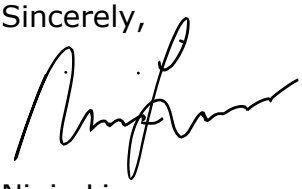
Third, the provision is not sufficiently targeted to address clearly defined harms. Instead, it establishes a broad regulatory framework that applies across a wide range of technologies without distinguishing between higher-risk and lower-risk use cases. A more effective approach would focus on narrowly defined categories of concern while preserving access to widely used tools.

Finally, the provision's enforcement structure—combined with ongoing ambiguity around compliance obligations—creates substantial legal and operational risk. Without clear, workable standards, companies may face significant liability exposure despite good-faith efforts to comply, which could discourage innovation and limit the availability of services in Minnesota.

For these reasons, we respectfully oppose the youth chatbot provision as currently drafted. We welcome the opportunity to work with the author and the Committee to develop a more tailored approach that addresses concerns while ensuring that policies remain workable and appropriately scoped.

Thank you for your time and consideration. We welcome continued dialogue with the Committee and stand ready to be a resource as you consider these issues.

Sincerely,



Ninia Linero
Executive Director, Illinois & the Midwest
TechNet

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