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August 20, 2025

The Honorable Robert Rodriguez  
Senate Majority Leader  
200 E Colfax  
RM 346  
Denver, CO 80203

Dear Majority Leader Rodriguez,

On behalf of the Consumer Technology Association (CTA), we are writing to urge you to continue working with stakeholders to get artificial intelligence (AI) policy right in Colorado.

CTA has significant concerns with the draft language of the Colorado AI Sunshine Act that was released on August 19, 2025. We appreciate your ongoing efforts to fix issues with the Colorado AI Act, but the Colorado AI Sunshine Act as currently drafted is not a workable solution. We strongly urge you to pass legislation in the upcoming special session that will delay the implementation of the Colorado AI Act until at least 2027. This will provide adequate time for Colorado to find a path toward encouraging responsible innovation and strengthening the state's AI economy.

As North America's largest technology trade association, CTA represents more than 1200 American Companies – including several with operations in Colorado – that collectively support over 18 million U.S. jobs. Our members include the world's most dynamic innovators, from pioneering startups to global enterprises, and we are the organizers of CES – the most powerful tech event in the world.

CTA also produces a U.S. Innovation Scorecard, highlighting which states best champion smart policies for tech startups across 11 distinct categories. Failure to fix issues with the Colorado AI Act, or failure to delay the law's implementation long enough to reach agreement on needed fixes, would likely lower Colorado's ranking as a state friendly to innovation as we include new technologies like AI in future scorecards. Colorado is competing to become a leading state for new economic opportunities like AI and quantum computing. Now is the time to ensure Colorado companies, and companies considering bringing business to Colorado, have a predictable and reasonable regulatory environment.

CTA appreciates that the Colorado Sunshine Act would remove problematic impact assessment requirements from the Colorado AI Act. We also appreciate that there is no new private right of action and enforcement authority is delegated to the Attorney General in the draft text. But other aspects of the bill present serious compliance issues. Many of the requirements contained in the "individual right to access and correct data used by an algorithmic decision system" would very likely be infeasible to comply with. This would create legal uncertainty for businesses of all sizes

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– with small businesses forced to pay unsustainable compliance costs and still not have any clarity as to whether they could face enforcement. Other aspects of the bill, including the requirement to disclose “the 20 twenty personal characteristics” that most influenced a decision, are also likely not technologically feasible.

This letter is not intended to provide a complete assessment of every requirement proposed in the Colorado AI Sunshine Act draft, nor is it a full list of needed fixes to the Colorado AI Act. But the examples mentioned here serve as a clear illustration that more time is needed to find an appropriate path forward for fixing Colorado’s AI regulations. As the Colorado legislature approaches a special session this week, we encourage you to delay the implementation of the Colorado AI Act until 2027 and ensure that there is time to get the policy right. Rushing an incomplete or unworkable solution would not be in the best interest of consumers or Colorado businesses.

We look forward to working with you on policies that will help to position Colorado as a leader in the AI economy.

Sincerely,



Gary Shapiro  
CEO and Vice Chair  
Consumer Technology Association



Kinsey Fabrizio  
President  
Consumer Technology Association