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May 22, 2026

The Honorable Mary Edly-Allen
Illinois State Senator, 31st District
Stratton Office Building
Section F, Room D
Springfield, IL 62706

Dear Senator Edly-Allen,

The Consumer Technology Association® (CTA) submits these comments highlighting industry concerns with the package of artificial intelligence (AI) bills under consideration in the General Assembly, including SB 315. CTA shares your goal of ensuring AI is developed safely and responsibly. However, advancing broad AI regulation at the end of the legislative session without sufficient deliberation could undermine the state's edge as a hub for innovative companies.

CTA is North America's largest technology trade association and represents more than 1200 U.S. companies, including many based in Illinois. Eighty percent of CTA members are small businesses and early-stage companies. Together, our members support more than 17 million American jobs. Our members range from startups to global companies, and CTA produces CES®, the world's most powerful technology event. CTA also publishes the U.S. Innovation Scorecard, which measures how well states support innovation and entrepreneurship. Enactment of SB 315 and other problematic AI regulation would likely lower Illinois' ranking as a state friendly to innovation as we include new technologies like AI in future scorecards.

California and New York have already enacted model-level AI laws, and Colorado recently revised its AI law after implementation challenges emerged. We appreciate Illinois' efforts to align some proposals with other states. However, we strongly encourage lawmakers to allow time for these states to implement their laws and for policymakers to evaluate the results before moving forward in Illinois.

SB 315 would require third-party audits of AI systems, but a sufficient market of qualified auditors does not yet exist. Companies could face significant compliance risk because the vendors needed to meet the bill are not widely available. In addition, there is no consensus on the standards those auditors should follow. These audit provisions would be difficult to implement and could go further than approaches under consideration in other jurisdictions. SB 315 also applies broad compliance obligations without distinguishing between models that pose reasonably foreseeable catastrophic risks and those that present low risk. The bill also creates uncertainty because it lacks a clear safe harbor and does not clearly address liability when downstream users modify AI models.

As Illinois seeks to strengthen innovation, job growth, and consumer protection, we urge lawmakers to take a deliberate approach to AI regulation. Advancing a broad package of AI bills in the final days of the legislative session would create unnecessary risk and uncertainty for the state's economy.

Sincerely,

A handwritten signature in black ink that reads "Kinsey Fabrizio". The signature is written in a cursive style with a large, prominent initial "K".

Kinsey Fabrizio
President and CEO
Consumer Technology Association