



December 17, 2025

The Honorable Robert Rodriguez, Chair  
Artificial Intelligence Impact Task Force  
200 E Colfax  
RM 346  
Denver, CO 80203

**RE: Implementation and potential modification of SB 24-205.**

Dear Senator Rodriguez and Members of the Task Force:

On behalf of Chamber of Progress – a tech industry association supporting public policies to build a more inclusive society in which all people benefit from technological advancements – I write regarding your ongoing work to implement SB24-205, *Concerning Consumer Protections in Interactions with Artificial Intelligence Systems*.

**The Task Force has Heard Repeatedly that SB 24-205 is Deeply Flawed**

We repeatedly stressed problematic definitional language in SB24-205 during the legislative session. In brief, by focusing on regulating *technology*, legislators lost an opportunity to police *harm*. Rigorously defining artificial intelligence, a dynamically evolving set of technologies, without regulating all of consumer software is difficult if not impossible.

The long list of exceptions to the legislative definition of artificial intelligence implicitly concedes this point. Numerous commentators, including Colorado startup companies, have similarly raised their concern that their services will be implicated, even when it is unclear what, if any, impact on civil rights their products could have. Nevertheless, as covered entities, they face significant obligations under SB24-205.

Moreover, by subjecting online behavior to additional scrutiny, the legislature has unintentionally created a perverse opportunity for offline discriminatory arbitrage. Consumers should be equally protected from discrimination online or offline.

## **The Legislature Must Not Make Matters Worse**

As alarming as the current state of affairs is, recent reporting indicates the Task Force is under pressure to *increase* the number of covered entities<sup>1</sup>. Broadening the regulatory aperture of SB 24-205 will only serve to make the existing problems worse. With the effective date fast approaching, SB 24-205 has already created significant uncertainty for the Colorado technology sector. Adding more covered entities - who would have even less time to prepare for implementation- is a recipe for chaos.

## **At Minimum, Implementation Should be Delayed**

Chamber of Progress condemns discrimination whether online or offline. We believe that existing Colorado civil rights protections apply to algorithmic situations, but if there are any “algorithmic loopholes” in those protections, the legislature should adopt sector-specific policies to close them.

As you consider the best way to pursue that goal, we ask that, at a minimum, you recommend to the Joint Technology Committee a delay in the effective date of SB24-205 to allow businesses and consumers more time to prepare for the changing policy landscape. We further call on you to recommend amending SB 24-205 to focus on sector-specific policy to address harms.

Sincerely,



**Kouri Marshall**

Director of State & Local Government Relations, Central Region

Cc: Senator Mark Baisley, Rep. Brianna Titone, Rep. Ron Weinberg and Committee Staff

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<sup>1</sup> See

<https://insideaipolicy.com/ai-daily-news/consumer-labor-groups-ask-colo-lawmakers-remove-loopholes-nation-s-first-ai-law>