



October 29, 2024

Artificial Intelligence Impact Task Force
State of Colorado
200 E Colfax Avenue
Denver, CO 80203

Dear Chair Rodriguez, Vice Chair Titone, and Members of the Committee:

Thank you for the work you are undertaking to examine the use of artificial intelligence (AI), including the benefits it can unlock for consumers and the importance of leveraging this technology responsibly. On behalf of Zillow, I am writing to share our approach to utilizing AI as we reimagine real estate to make it easier for consumers to unlock life's next chapter.

Artificial intelligence has been central to Zillow since our founding in 2006 with the launch of the Zestimate, a first-of-its-kind tool that allows consumers to find an instant, free estimate of their home's value.

As our use of technology evolves, Zillow's pro-consumer approach to innovation remains at the core of our mission to make home a reality for more and more people. Given the hundreds of millions of people searching for housing online today, it's vital that consumers are equipped with safe, trustworthy tools to make the process of searching for, renting, buying, or financing a home more equitable and transparent – and less daunting. Zillow's use of AI is a critical component of the advancements in our technology that benefit consumers, our partners, and employees.

To that end, I'd like to share how Zillow is using AI to advance our mission:

Help more people get home. We strive to use AI to help make renting, buying, selling and financing easier, affordable, and safer for customers. Our AI tools help consumers navigate the real estate process by making it easier to search for, finance, buy or rent a house in an accessible and equitable way.

Enable partners to provide greater value to customers. Great agents are critical to helping customers get home. We strive to use AI to help agents become even more productive and successful, with tools to help scale their operations, automate mundane tasks, and access important data so they can focus on delivering what only they can: the human component.

Empower employees to do more and go further. Employees are the backbone of Zillow, and they choose to work here in part because of our proven commitment to responsible innovation.

We use AI to empower employees to continue the work of shaping our industry with greater efficiency and excellence and to, in the process, accelerate their own career development.

Zillow supports efforts to examine risks from AI across sectors and, to the extent that regulatory gaps are identified in housing, we welcome the chance to explore how proposals can protect consumers without stifling innovation. Overall, we support proportionate, flexible, and risk-based regulatory frameworks that avoid limiting the potential benefits of AI. In addition to our [core values](#), we are guided by the following principles to inform responsible development, evaluation and deployment of AI technologies:

Fairness. We prioritize fairness in the design, evaluation, and deployment of AI systems across Zillow, understanding the distinct influence that the models we use have on housing opportunities. Therefore, we continuously test and review our training data and models to ensure that they empower everyone, including historically marginalized communities and members of protected classes by minimizing and actively avoiding recreating existing patterns of discrimination and segregation.

Safety & accountability. We strive to apply the highest standards and best practices for the collection, use, and validation of both internal and external data used in our models and apply prevailing standards to assessing third-party models we may utilize. As AI technology continues to develop, we will work to be leaders in its responsible use in all contexts, keeping in mind both new opportunities and new risks. We aim especially for a deep understanding of our domain and of the impacts our AI systems have on our customers, their privacy, the security of their data, and their housing journey.

We follow rigorous privacy and security policies and standards to ensure customer, partner, and employee data remains secure. When integrating external data into our models, we conduct thorough due diligence to assess its reliability and accuracy. We actively share our progress, learnings, and areas for improvement within Zillow to foster trust and accountability.

Transparency. One of Zillow's founding principles is to empower people with information in what was once an incredibly opaque and complex process of searching for a home. We have the same opportunity with the AI systems we are building. We believe it is important to ensure that consumers are aware of when they are interacting with AI tools developed by Zillow and others and that they understand how Zillow uses these tools to improve their experience. We endeavor to ensure that customers understand and can decide whether and how their data is used to shape their experience on our platform.

We are dedicated to fostering responsible AI dialogues and spearheading meaningful conversations on how to effectively and ethically integrate AI into the real estate industry to create internal efficiencies and new consumer tools. We actively engage with industry participants, lawmakers, nonprofit organizations, research institutions, and other stakeholders to shape and inform pro-consumer AI public policies.

Inclusiveness. We build AI systems capable of understanding consumers', partners', and employees' unique needs, avoiding broad generalizations that might marginalize segments of our society. We proactively identify AI models and systems where customers might be treated and prioritized differently throughout all stages of their home journey. Through monitoring and evaluation, we test and analyze our AI technologies with the aim of mitigating the risk of bias and discrimination, providing equal opportunities and experiences for all people.

An example of our approach is Zillow's [Fair Housing Classifier](#), which was designed to establish guardrails in real estate conversations that are powered by large language model (LLM) technology:

As you likely know, in the simplest of terms, an LLM is a form of generative AI that can be thought of as a storage space for vast amounts of conversational language data. Many chatbots are powered by LLMs, and when you ask a question, the chatbot goes to its LLM to look through its stored language data and provide you with the correct answer. A chatbot is only as good as the data contained in its LLM.

Out of the box, the LLMs behind many AI solutions do not consider fair housing requirements in conversations with users, and when deployed, can perpetuate bias. To address this, Zillow has built the Fair Housing Classifier, which focuses on mitigating the risk of illegal "steering," or the practice of influencing a buyer's choice based upon legally protected characteristics under federal law. The classifier detects language that violates federal, state and local anti-discrimination laws. When the classifier spots cases of noncompliance, it's up to the system developers to figure out how the LLM will respond.

As a part of our commitment to responsible innovation, Zillow has released this classifier under an open-source license, allowing others in the real estate, technology and civil rights sectors to join in strengthening fair housing practices to foster a more fair and equitable landscape.

We hope sharing our approach and this example is helpful as you continue to work to understand how companies are leveraging AI to support the consumer. Please don't hesitate to contact me with any questions or for further discussion.

Sincerely,



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