



February 11, 2025

The Honorable Robert E. Craven, Sr., Chairman
House Judiciary Committee
State House
Providence, RI 02903

Re. H.5224, An Act Relating to Courts and Civil Procedure – Procedure Generally – Causes of Action

Dear Chairman Craven:

The undersigned members of the Rhode Island Business Coalition are in opposition to House bill 5224, An Act Relating to Courts and Civil Procedure – Procedure Generally – Causes of Action. This bill creates "strict liability" for developers of certain artificial intelligence (AI) models for actual harm to non-users.

It is important to note that many real-world products contain multiple AI models and applications, developed by different research and engineering teams, each using multiple datasets from multiple sources, and deployed by a party with direct interface with the user, sometimes with multiple possible use cases.

The original developer of an AI model has little to no visibility or control over how it is being used by a deployer, and may not have any interactions with users. Even in cases where an application is provided by the developer directly to the deployer, and no modifications are made, deployers will often be best placed to understand downstream use cases and their attendant risks, implement effective risk management strategies, and conduct post-market monitoring and logging, which developers of general-purpose AI models are not equipped to do. The fundamental principle is that the party that has control over a specific step in the development lifecycle of an AI model should bear the responsibility for that specific step.

Last year the California legislature passed similar legislation that was vetoed by Governor Gavin Newsom. In his veto message, Governor Newsom stated,

“Adaptability is critical as we race to regulate a technology still in its infancy. This will require a delicate balance. While well-intentioned, SB1047 does not take into account whether an

The Rhode Island Business Coalition represents 50 industries and 6,280 businesses that employ 231,200 people throughout Rhode Island.

AI system is deployed in high-risk environments, involves critical decision-making or the use of sensitive data”.

Businesses across our state incorporate AI into their work flows to improve their efficiency and productivity. A recent article in the Providence Journal highlighted a technology start-up by two Brown University students utilizing AI to improve medical billing practices. While this start-up does not meet the threshold for regulation under this proposed bill, we believe it shows the innovation that is possible utilizing AI.

We recognize regulation of AI is needed, however it is important that it be done in a thoughtful way to not inadvertently stifle innovation. It is important that Rhode Island not lose access to the most advanced AI models that will power new scientific discoveries in health, education, and sustainability.

Sincerely,

East Greenwich Chamber of Commerce

Rhode Island Hospitality Association

Rhode Island Manufacturers Association

Rhode Island Marine Trade Association

Rhode Island Staffing Association

Small Business Economic Summit Regulations Subcommittee

Small Business Economic Summit Tax and Budget Committee

TechNet

cc. House Judiciary Committee members