



July 13, 2026

Attorney General Phil Weiser
Office of the Attorney General
Colorado Department of Law
Ralph L. Carr Judicial Building
1300 Broadway, 10th Floor
Denver, CO 80203

Re: Pre-Rulemaking Considerations for the Automated Decision-Making Technology (Senate Bill 26-189) and Chatbot Safety (House Bill 26-1263) Acts

Dear Attorney General Weiser,

The AI Integrators Council (AIIC) serves as the primary voice for leading companies working to integrate artificial intelligence into systems, platforms, and applications. The AIIC welcomes the opportunity to provide input to the Colorado Attorney General's Office as it prepares to adopt and implement rules as mandated through Senate Bill 26-189, the Automated Decision-Making Technology Act (ADMT Act). As Colorado implements the ADMT Act, it is especially important to recognize how integrators embed AI into workflows in ways that support human reviewers, rather than making consequential decisions themselves.

We support the Colorado government's efforts to provide guidance and regulatory reforms for AI policy to promote US innovation and advancement of this emerging technology. The AIIC was created to educate policymakers and other essential stakeholders about the complexity of roles, responsibilities, and relationships across the AI ecosystem and to advocate for policies based on an accurate understanding of this ecosystem. We are comprised of leading AI companies including Alteryx, Atlassian, Box, Cognizant, Docusign, Peraton, SAIC, Salesforce, ServiceNow, and Twilio. The AIIC wishes to provide specific input on specific questions as outlined in the Pre-Rulemaking Considerations.

IV. Targeted Questions for Informal Input on the ADMT Act

1. Definitions of “materially influence” and other terms

As AI continues to evolve and expand, the AIIC believes it is essential that state AI policies fully reflect the complexity of the AI value chain—particularly the critical role played by integrators. Initial policy discussions, draft legislation and potential regulations, including the ADMT Act, have centered on binary definitions such as “developers” and “deployers” of AI models.

However, between these two categories lies the AI integrator—an entity that connects, configures, and embeds AI systems within existing organizational processes and technology environments, but does not control the upstream development of AI models or the downstream deployment and management of AI solutions for end users. The AIIC has published a [whitepaper](#) that describes this role in detail and sets out practical examples of integrators in the AI value chain. The AIIC advocates for forward-looking regulations on AI that recognize integrators and other actors in the AI value chain, and policy that anticipates the continuing evolution of the technology stack.

In regards to the question of whether the definitions of “developer” and “deployer” are sufficient, the legislation does not recognize the distinct roles and responsibilities of key actors across the AI ecosystem. By relying on an overly simplistic “developer–deployer” distinction, existing policies overlook the layered and interdependent nature of the AI value chain, in which model developers, integrators, application developers, deployers, and infrastructure providers each play unique roles. For example, integrators are responsible for adapting and operationalizing AI models within client systems, but do not control foundational model design. In practice, AI integrators may embed AI features into a wide range of business workflow tools, such as document routing systems, web intake forms, scheduling tools, AI customer service and support agents, or tools that can summarize key contract terms, account activity, or inventories for human review. These capabilities help people work more efficiently without independently deciding outcomes in areas like employment, credit, or healthcare.

The absence of a comprehensive federal AI measure, combined with a growing patchwork of state laws, has created a shifting regulatory landscape that leaves integrators navigating overlapping compliance obligations, uncertainty around liability standards, and frequent contractual disputes over who bears responsibility for bias mitigation, explainability, and post-deployment oversight — often forcing integrators to assume disproportionate risk for upstream design flaws. Fortunately, NIST has provided a strong foundation through standards like the GenAI RMF, which offers clear, practical guidance for managing AI risk across the value chain. We encourage the Attorney General to look to the NIST GenAI RMF as a reference point when defining documentation and risk management expectations, and to ensure that the framework accounts for integrators as distinct actors in the AI value chain.

To address these issues, AI policy and regulatory efforts should adopt a role-based framework that assigns obligations in proportion to how each stakeholder’s actions impact risk. Crafting AI policies and technical frameworks to reflect these differentiated roles would clarify accountability, reduce litigation risk, and better align compliance with operational authority. In the context of the ADMT Act, this means Colorado’s rules should assign obligations in proportion to each stakeholder’s role, and should not treat AI integrators as developers or deployers solely because they embed general-purpose AI tools into administrative workflows.

Conclusion

We encourage the Colorado Attorney General's office's continued work on regulation and guidance to support AI safety and innovation. The AIIC urges for the recognition of AI integrators as a distinct and indispensable part of the AI value chain as outlined in the ADMT Act, and to ensure that future regulations and guidance reflect their critical role. Doing so will strengthen policy clarity, prevent misallocation of liability to infrastructure and platform providers, and support responsible innovation across enterprise workflows and the companies driving AI adoption across industries.

Thank you for your leadership on these critical issues. We look forward to continued collaboration as you work to promote AI innovation.

Sincerely,

Wes McClelland
Executive Director
AI Integrators Council