



Center for AI and
Digital Policy



ParentsTogether Action



rights4girls



Tech Oversight
CALIFORNIA



September 24, 2025

Dear Governor Newsom,

We write to you as a coalition of organizations in support of California's SB 53, a bill based on recommendations made by Governor Newsom's Joint California Policy Working Group's Report on frontier AI policy. Our organizations have worked for years to address the harms that emerged when the largest technology companies in the world released social media platforms that promised to connect us, but that instead irreparably damaged the lives of an entire generation of young people. Fifteen years ago, at the inception of social media, our policymakers failed to see what was coming and act to protect the public. Now, the same companies that build and profit from social media are leading the race to develop increasingly advanced AI systems. We can't afford to make the same mistakes now that we did last time.

California's SB 53 offers a chance to put in place basic transparency measures to ensure we aren't caught off guard by AI in the same way we were by social media. It would create basic transparency requirements for the largest frontier model developers, requiring that they write, follow, and publish plans to test their models to ensure they're safe for the public, require the reporting of serious safety incidents to the Office of Emergency Services, and establish whistleblower protections for those who report critical risks posed by AI foundation models.

If basic guardrails like this had existed at the inception of social media, our children could be living in a safer, healthier world. Whistleblowers like Frances Haugen and Arturo Béjar, who had to come out to the public without protections, could have come out years earlier and warned policymakers of the harms posed by social media without fear of repercussion. Policymakers would have had a clear understanding of what steps technology companies were taking — or refusing to take — to protect the public. Our policymakers and the public would have had a direct eye on how the largest companies were failing to protect the public.

Rather than covering a broad swath of AI developers, SB 53 narrowly covers the very largest companies on the cutting edge of this technology. Just as with social media, the largest AI developers with the most advanced systems may pose the highest risks to the public. Many large internet technology companies are already integrating their most advanced AI systems directly into their existing services. That means that the many millions of young people on these platforms have direct exposure to the most advanced AI systems in the world. That makes it even more critical to ensure these systems are safe for the public.

The provisions of SB 53 are based on the California Report on Frontier AI Policy. Established by Governor Newsom in 2024 and led by Dr. Fei-Fei Li, Dr. Jennifer Tour Chayes, and Mariano-Florentino Cuéllar, the report is anchored on the time-tested notion of “trust but verify”. The report calls for greater transparency into developers’ internal safety practices, clear adverse-event reporting, and strong whistleblower protections. SB 53 implements these principles for the largest, highest-impact developers.

First, the [Report](#) argues that “transparency into the risks associated with foundation models, what mitigations are implemented to address risks, and how the two interrelate is the foundation for understanding how model developers manage risk.” SB 53 implements this recommendation as a requirement for large AI developers to write, publish, and follow safety and security protocols to manage the most severe risks. Rather than prescribe specific technical standards that companies must follow, SB 53 simply requires companies to be transparent about the approaches they are using. Some of the specific required elements of safety protocols, such as a requirement to manage risks related to internal use of AI models and cybersecurity policies, directly mirror recommendations in the Report. Others mirror components of the [Stanford Foundation Model Transparency Index](#), which is cited prominently in the Report.

Second, the Report stated that “transparency into pre-deployment assessments of capabilities and risks, spanning both developer-conducted and externally conducted evaluations, is vital given that these evaluations are early indicators of how models may affect society and may be interpreted (potentially undesirably) as safety assurances.” SB 53 accomplishes this with a requirement that large developers publish transparency reports that include the results of their pre-deployment assessments of catastrophic risk. The Report also argues that “transparency into the safety cases used to assess risk provides clarity into how developers justify decisions around model safety,” which forms the basis for section 22757.12(c)(3).

Third, the Report concluded that “an adverse event reporting system that combines mandatory developer reporting with voluntary user reporting maximally grows the evidence base.” SB 53 takes exactly this approach by establishing a tightly defined set of critical safety incidents that AI developers are required to report to the Attorney General.

Finally, the Report recommends strengthening whistleblower protections, pointing out that “actions that may clearly pose a risk and violate company policies...may not violate any existing laws. Therefore, policymakers may consider protections that cover a broader range of activities, which may draw upon notions of ‘good faith’ reporting on risks found in other domains such as

cybersecurity.” This recommendation is mirrored in SB 53, which allows employees to report evidence of catastrophic risks as well as violations of SB 53 itself to government authorities with legal protections against retaliation.

SB 53 would put in place the basic protections that we failed to enact when social media was first released to the public. By taking action now, we can avoid the grave harms that resulted from letting social media run unregulated over our children for over a decade.

For these reasons, we respectfully urge your support of this important measure.

Sincerely,

Design It For Us
Encode AI

California Initiative for Technology & Democracy (CITED)
Center for AI and Digital Policy (CAIDP)
Center for Digital Democracy
Center for Youth and AI
Children's Advocacy Institute
Common Sense Media
InnovateEDU
Mothers Against Media Addiction (MAMA)
NoSo November
Parents Television and Media Council
ParentsTogether Action
Paving the Way Foundation
Project STAND
Public Interest Privacy Center
Rights4Girls
Suicide Awareness Voices of Education (SAVE)
socialmediaharms.org
Tech Oversight California
The Midas Project
Young People's Alliance
Youth Power Project