

Representative Mike Johnson
Speaker of the House
U.S. House of Representatives
Washington, DC 20515

Representative Hakeem Jeffries
Democratic Leader
U.S. House of Representatives
Washington, DC 20515

The Honorable John Thune
Majority Leader
U.S. Senate
Washington, DC 20510

The Honorable Chuck Schumer
Minority Leader
U.S. Senate
Washington, DC 20510

Senator Ted Cruz
U.S. Senate Committee on
Commerce, Science, & Transportation
254 Russell Senate Building
Washington DC, 20510

Senator Maria Cantwell
U.S. Senate Committee on
Commerce, Science, & Transportation
254 Russell Senate Building
Washington DC, 20510

Representative French Hill
U.S. House Committee on
Financial Services
2129 Rayburn House Office Building
Washington, DC 20515

Representative Maxine Waters
U.S. House Committee on
Financial Services
4340 O'Neill House Building
Washington, DC 20515

December 9, 2025

Dear Speaker Johnson, Majority Leader Thune, Minority Leader Schumer, Leader Jeffries, Chairman Cruz, Ranking Member Cantwell, Chairman Hill, and Ranking Member Waters:

The Coalition for Sensible Safeguards (CSS), an alliance of over 220 labor, scientific, research, good government, faith, community, health, environmental, and public interest groups, and the undersigned groups are writing with significant concerns about the Strengthening Artificial Intelligence Normalization and Diffusion by Oversight and eXperimentation (SANDBOX) Act (S. 2750). For over 20 years, CSS has been dedicated to strengthening and improving the federal rulemaking process to ensure federal agencies serve the interests of the American people.

As with any emerging technology, Artificial Intelligence (AI) presents [hazards](#) that need to be better understood and addressed to prevent harm to the public. Yet, instead of a legislative push that prioritizes federal guardrails that protect consumers, workers, and the environment, Senator Ted Cruz (R-TX) has proposed the [SANDBOX Act](#), placing corporate deregulatory goals over the [public interest](#).

Americans need a strong government that protects individual wellbeing, not the profit motives of major corporations, especially when it comes to technology that impacts jobs, safety, security, mental wellbeing, environmental protection, civil rights, to name just a few protections that could be at risk.

The SANDBOX Act would amend the National Science and Technology Policy, Organization, and Priorities Act of 1976 to authorize the Office of Science and Technology Policy (OSTP) to grant AI companies waivers that allow them to be exempt from federal regulations governing AI

products for up to a decade, with approval granted in two-year increments. In other words, this bill proposes sweeping deregulation for far more time than could ever be necessary to pilot a project.

The SANDBOX Act is written so broadly that it could arguably apply to any law or regulation an AI company is covered by—including consumer protections, labor laws, environmental standards, civil rights, among others. The bill would authorize applicants, rather than regulators, to drive risk assessments, undermining public trust, and failing to include a key constituency in developing these assessments.

This bill would provide an agency with limited time to make a decision on whether to approve or grant an application for a waiver. While the bill would task agencies with soliciting and considering input from the private sector and technical experts, alarmingly, there appears to be no obligation for the agency to seek input from individuals or communities at risk of harm. Further, the SANDBOX Act would grant OSTP substantial power to move ahead with an application if the agency fails to submit a decision or to override a regulating agency if an applicant appeals an agency's denial. Sidelineing regulatory agencies strips away expertise and institutional safeguards, presenting yet another [handout to Big Tech](#). AI companies should never be permitted to operate without regulatory oversight; agencies must be able to monitor risks and ensure compliance (even in a sandbox environment).

AI companies approved to operate under a waiver granted under the SANDBOX Act program would not be required to provide sufficient consumer protections for the potentially significant harms the product may cause. All the bill would require is that the company note on a website or by other public means that the product “may not function as intended and may expose the consumer to certain risks” and that consumers “may contact the [National Artificial Intelligence] Initiative Office to file a complaint.” Companies must ensure that users of its products have information about potential risks so they can make informed decisions about whether to use a product. Marginalized groups and vulnerable populations, including children and seniors, should not be treated as test subjects left to bear the risk of potentially unsafe AI deployment.

The SANDBOX Act would direct OSTP to submit a “[special message](#)” (a tool usually reserved for presidential communication on major initiatives) to Congress listing regulations it has waived under the program that it would recommend be permanently amended or repealed. The bill would then codify fast-track procedures for the House and Senate to approve those amendments or repeals. In other words, the bill would transform temporary exemptions into a pathway to permanent industry carve-outs with limited information, and through fast-track procedures with limited debate.

The SANDBOX Act is a moratorium by another name. It is not about experimentation or innovation, or about mitigating risks and ensuring compliance before entering the market—it is about exemption. It would exempt companies from rules, from accountability, and from responsibility for the harms they cause. The SANDBOX Act would tilt power toward industry at the expense of consumers, workers, and the environment, posing the greatest harm to the most vulnerable populations.

Congress must reject deregulatory gimmicks like the SANDBOX Act and instead empower expert regulatory agencies to address the potential harms of emerging AI technology through common sense safeguards that are responsive to the needs of the American people.

Respectfully Submitted,

20/20 Vision

350 Triangle

Accountable.US/Accountable.NOW

AFT

American Association of Family and Consumer Science (AAFCS)

American Bird Conservancy

American Federation of State, County and Municipal Employees (AFSCME)

Americans for Financial Reform

CA Alliance for Consumer Education (CACE)

Center for Countering Digital Hate

Center for Democracy & Technology

Center for Digital Democracy

Center for Justice & Democracy

Center for Progressive Reform

Clean Elections Texas

Climate Hawks Vote

Coalition Against Racism

Coalition for Sensible Safeguards

Coalition on Human Needs

Color Of Change

Common Cause

Consumer Action

Consumer Federation of America

Consumers for Auto Reliability and Safety

Earthjustice

Economic Policy Institute

Electronic Privacy Information Center (EPIC)

Endangered Species Coalition

Equal Rights Advocates

Food & Water Watch

Friends of the Earth US

Future of Music Coalition

Georgia Watch

Government Information Watch

Great Lakes Wildlife Alliance

HEAL (Health, Environment, Agriculture, Labor) Food Alliance

Housing and Economic Rights Advocates

Impact Fund

Interfaith Center on Corporate Responsibility

Investor Alliance for Human Rights

Kapor Center Advocacy

Lawyers' Committee for Civil Rights Under Law

League of Conservation Voters

National Action Network

National Association of Consumer Advocates

National Association of Consumer Advocates, Ohio State Chapter

National Consumer Law Center (on behalf of its low-income clients)

National Employment Law Project

National Nurses United

National Women's Law Center

Natural Resources Defense Council

NC Environmental Justice Network

Ocean Conservation Research

Open Market Institute

Oregon Consumer Justice

Oregon Consumer League

Oxfam America

People Power United

Piedmont Environmental Alliance

Protect Democracy United

Public Citizen

Public Good Law Center

Public Knowledge

SafeWork Washington

SC Appleseed Legal Justice Center

Stand.earth

Strong Economy For All Coalition

Texas Appleseed

Texas Watch

The Tech Oversight Project

The Value Alliance

Third Act NJ

Tzedek DC

Union of Concerned Scientists (UCS)

United Steelworkers (USW)

Virginia Citizens Consumer Council

WE ACT for Environmental Justice

William E. Morris Institute for Justice

Woodstock Institute

Writers Guild of America West

Wyoming Wildlife Advocates