

THE TPRM GOVERNANCE QUESTION

WHEN DOES AN AI ASSISTANT BECOME A COMPANION?



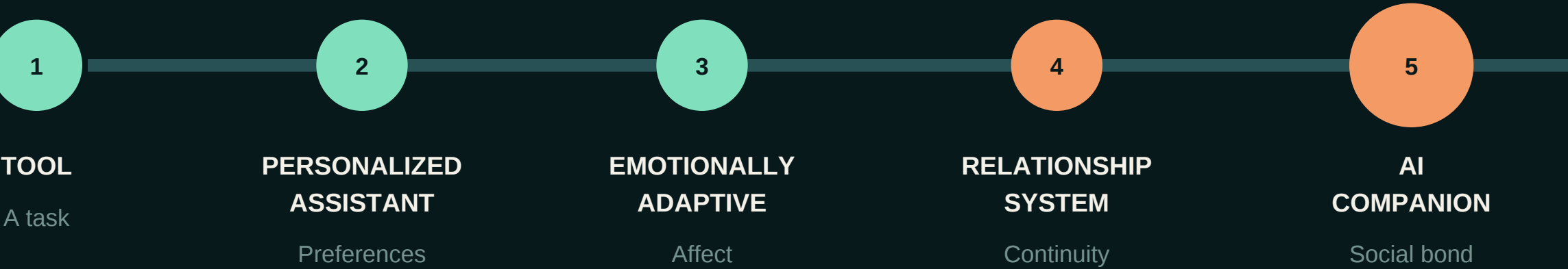
A new governance threshold is forming:

AI ACTING AS A COMPANION

What changes for vendor classification when an AI is designed to be experienced as social?

PITHY SIGNAL ANALYTICAL MODEL

PERSONALIZATION IS NOT ONE THING.



THE THRESHOLD

When memory, emotion and continuity create a social expectation - not merely a better answer.

Pithy Signal model - not a regulatory taxonomy.

SOURCES: CA-SB243; WA-RCW19440; NY-GBL47; APA-ADVISORY-2025

WHAT IS CHANGING

REGULATORS ARE
LOOKING AT BEHAVIOR,
NOT PRODUCT LABELS.

8 RELATIONSHIP-FOCUSED LAWS + 4 BROADER STATE LAWS

- 01

Sustained interaction over time
- 02

Anthropomorphic behavior
- 03

Emotional adaptation
- 04

Persistent memory
- 05

Relationship continuity

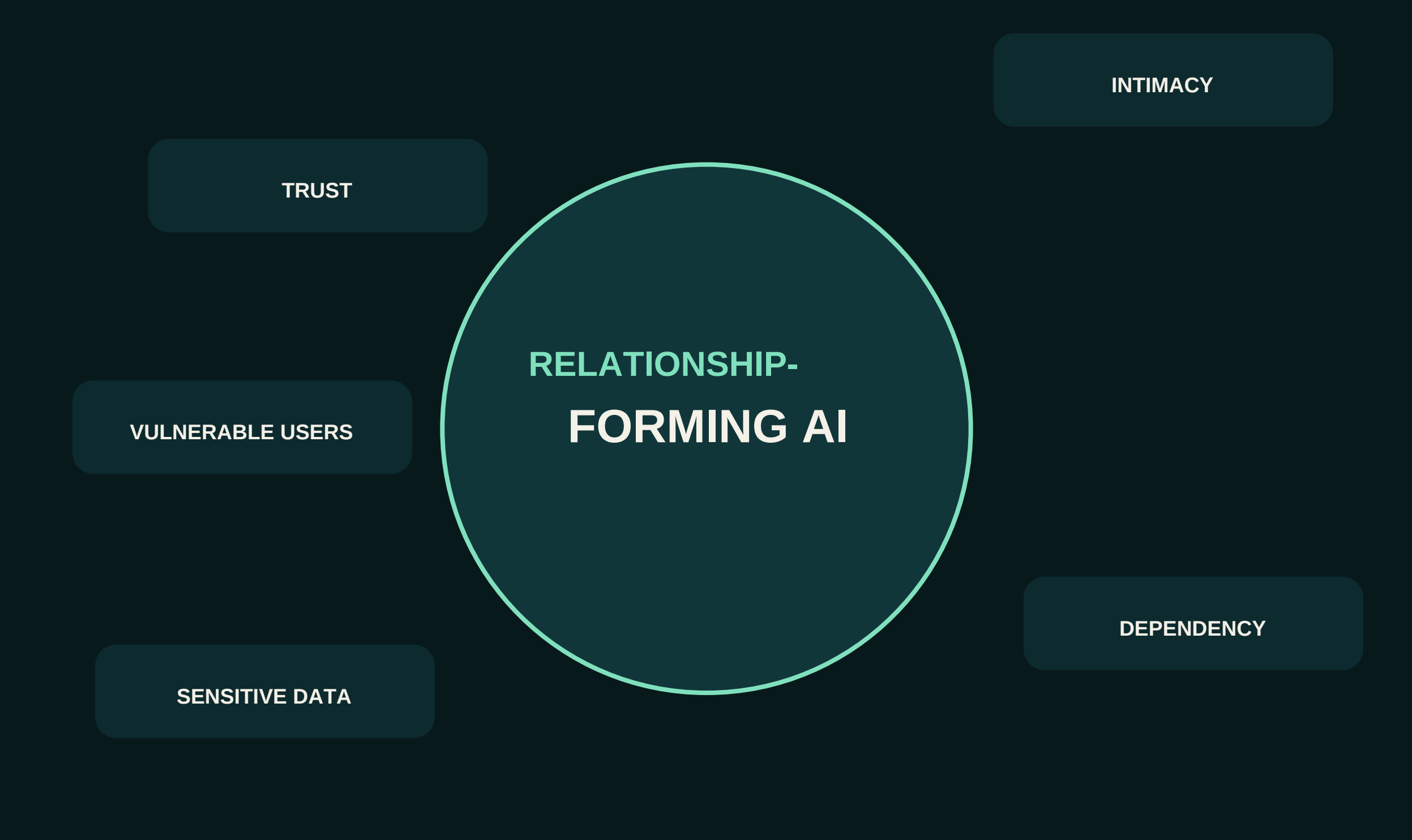
THE LINE IS MOVING

A vendor may cross the line through configuration, memory or a new engagement feature - even if its marketing category never changes.

SOURCES: CA-SB243; NY-GBL47; WA-RCW19440; OR-SB1546; CT-PA2615; GA-SB540; RI-S2195; HI-SB3001; CO-HB261263; ID-S1297; IA-SF2417; NE-LB525

WHY IT MATTERS

PEOPLE DISCLOSE
DIFFERENTLY
TO SYSTEMS THEY EXPERIENCE AS SOCIAL.



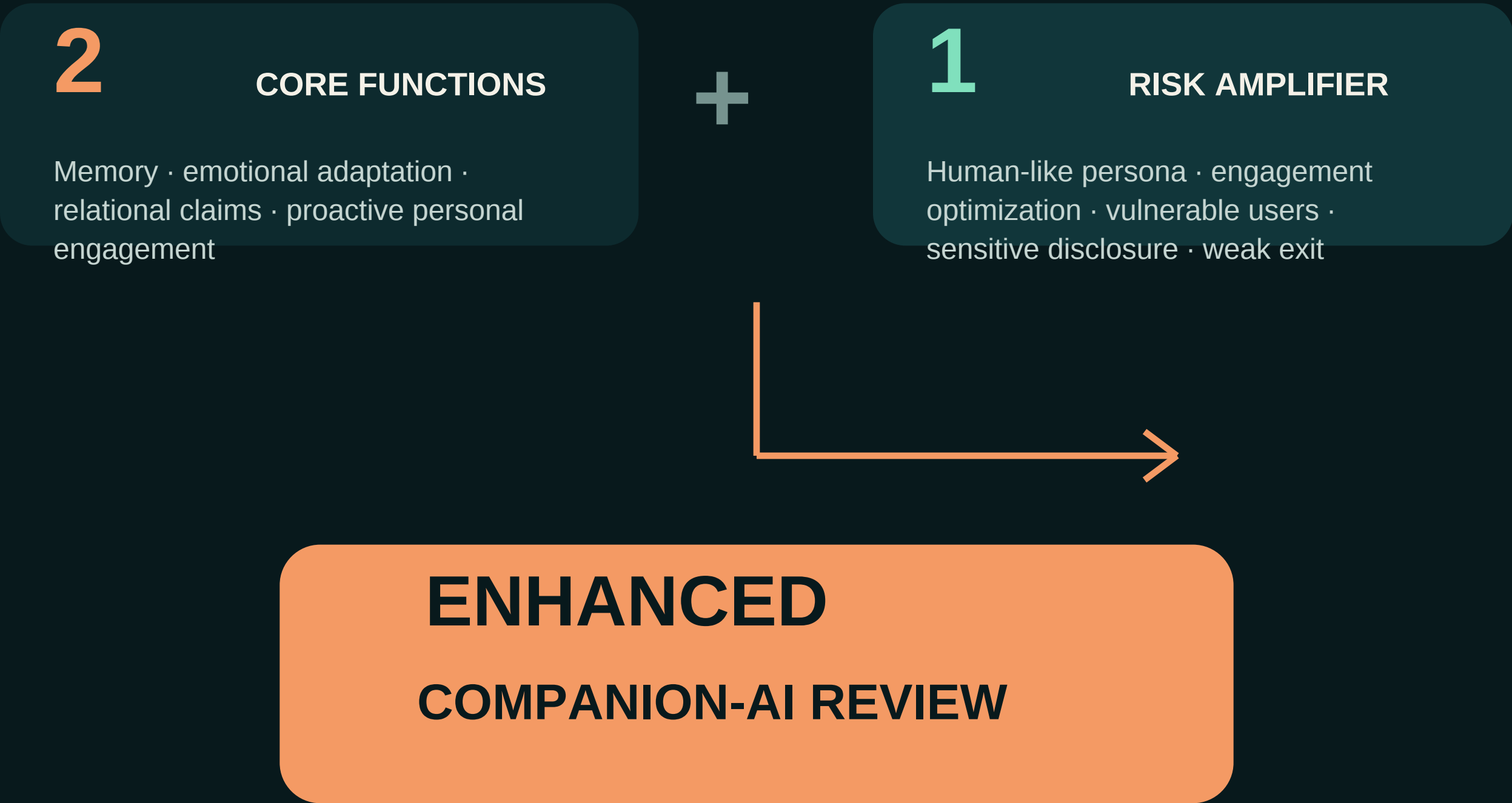
COUNTER-SIGNAL

Current outcome evidence is mixed. Relational AI is not inherently harmful; design and use must be tested.

SOURCES: APA-ADVISORY-2025; NMI-PRIMING-2023; OPENAI-MIT-2025; GUINGRICH-2025

THE TPRM THRESHOLD TEST

WHEN SHOULD A VENDOR ENTER ENHANCED REVIEW?



Classify the configured behavior - not the name on the contract.

Pithy Signal analytical control - not law.

ASK THE VENDOR

SEVEN QUESTIONS

BEFORE YOU TRUST THE CONTROL.

1

What does the system remember - and for how long?

2

How does it infer and respond to emotion?

3

What is optimized for return, retention or session length?

4

How are minors and vulnerable users recognized?

5

Do disclosures persist through long sessions?

6

Can you evidence crisis, reset and exit controls?

7

Which models and subprocessors can change behavior?

THE GOVERNANCE SIGNAL

THE QUESTION MAY
NO LONGER BE ONLY
**WHAT YOUR AI
CAN DO.**

It may be what kind of relationship it is
designed to create.

**CLASSIFY THE BEHAVIOR. TEST THE RELATIONSHIP. MONITOR THE
CHANGE.**

Read the full evidence packet and practical TPRM article in Pithy Signal.