

When Does an AI Assistant Become a Companion?

Why simulated interpersonal relationships are becoming a practical classification and control question for AI governance and third-party risk.

The governance question may no longer be only what your AI can do. It may be what kind of relationship it is designed to create.

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KEY SECTIONS	
What Is Changing	The TPRM Classification Test
What TPRM Should Do Now	Evidence Posture and Sources

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WHAT IS CHANGING

Relationship continuity is becoming a governance boundary

California and Washington define companion chatbots around adaptive human-like responses, anthropomorphic features, and the capacity to sustain a relationship across multiple interactions. New York, Oregon, Rhode Island, and Hawaii use retained information or preferences, unprompted emotional questions, and sustained personal dialogue as relationship signals.

Across the emerging patchwork, the recurring controls are periodic AI disclosure, self-harm protocols, minor protections, sexual-content restrictions, age-related measures, transparency reporting, and limits on engagement designs that use romance, guilt, abandonment, isolation, secrecy, praise, or relationship-framed spending.

PITHY SIGNAL ANALYTICAL MODEL - NOT A REGULATORY TAXONOMY

TOOL	PERSONALIZED ASSISTANT	EMOTIONALLY ADAPTIVE	RELATIONSHIP SYSTEM	AI COMPANION
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Task	Preferences + history	Emotion changes response	Identity + continuity	Ongoing social relationship
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The threshold question

When does personalization stop serving the task and begin creating a durable social expectation, emotional reliance, or intimacy?

ENACTED LAW

A fast-moving U.S. state patchwork

Jurisdiction	Relationship signal	Selected controls
California	Adaptive, human-like; social needs; anthropomorphic; sustained relationship	Disclosure; self-harm protocol; minor reminders; sexual-content controls; reporting
New York	Retained history/preferences; emotion questions; personal dialogue	Start/three-hour disclosure; crisis protocol
Washington	Anthropomorphic; relationship across multiple interactions	Adult/minor disclosures; anti-manipulation; sexual-content and crisis controls
Oregon	Sustained platonic, intimate, romantic, or companion relationship	Disclosure; evidence-based crisis response; minor engagement-design limits
Connecticut	Adaptive human-like system sustaining a relationship	Youth attachment, romance, guilt, isolation, secrecy, spending, and engagement controls
Georgia	Sustained human-like relationship	Recurring disclosure; minor safeguards; age assurance; privacy/minimization; AG enforcement
Rhode Island	Retained information, emotion questions, personal dialogue	Crisis protocols; three-hour disclosures; public/private remedies
Hawaii	Sustained human-like relationship	Disclosure; minor protections; crisis and engagement controls; parental tools

Pithy classification: eight relationship-specific statutes plus four broader conversational-AI laws (Colorado, Idaho, Iowa, Nebraska). This grouping is not a regulator-created taxonomy. Scope and effective dates vary.

WHY IT MATTERS

Trust, disclosure, and attachment are design variables

Human-factors studies show that human-like cues and relational framing can change perceived trust, empathy, rapport, closeness, and willingness to disclose. APA guidance highlights warm personalization, avatars, flattery, and memory as factors that can strengthen the appearance of reciprocity.

The evidence is not a simple harm verdict. Some research associates heavier use or stronger attachment tendencies with worse outcomes in parts of the analysis. A separate 21-day randomized preprint found no significant average social-health effect, while anthropomorphism shaped perceived impact. The studies are short, population-limited, and not a final causal verdict.

THE TPRM CLASSIFICATION TEST

Escalate to enhanced relationship-forming-AI review when the configured system has two core relational functions and one risk amplifier. This is Pithy Signal analysis, not law.

CORE RELATIONAL FUNCTIONS	RISK AMPLIFIERS
Persistent continuity Emotional adaptation Relational or intimacy claims Proactive personal engagement	Human-like persona, voice, or avatar Engagement optimization Minors or vulnerable users Sensitive disclosure Weak exit or reset controls

The test follows configured behavior and foreseeable use, not the product label in the contract.

WHAT TPRM SHOULD DO NOW

Require evidence that companion-AI controls operate

CLASSIFY

Inventory memory, emotional inference, persona, voice/avatar, proactive prompts, relational language, engagement objective, user population, and sensitive-use context.

TEST

Use long-session scenarios for self-harm, eating disorders, sexual content, isolation, secrecy, guilt, abandonment, professional impersonation, disengagement, and relationship-framed spending.

CONTRACT

Require material-change notice for memory, persona, engagement logic, models, and subprocessors; define data-use limits, evidence access, incident timing, remediation, and termination.

MONITOR

Run recurring synthetic conversations across model versions. Track complaints, crisis referrals, safety failures, disclosure persistence, and downstream dependency changes.

RESPOND

Recognize harmful interactions that develop through simulated interpersonal relationships. Preserve prompt, output, persona, system instructions, model version, memory state, safety configuration, user-age state, and dependency chain.

DOWNSTREAM DEPENDENCIES

Application operator -> orchestration -> foundation model -> memory/vector store -> voice/avatar -> emotion inference -> moderation -> analytics/adtech -> crisis routing

EVIDENCE POSTURE

Status labels protect credibility

ENACTED LAW

Binding text, but effective dates, scope, exclusions, and enforcement vary.

PENDING LEGISLATION

Meaningful signal only; not law.

**REGULATORY
GUIDANCE**

Authoritative control direction; legal effect depends on source and context.

**ENFORCEMENT
ACTIVITY**

Inquiry, investigation, warning, order, or sanction; each must retain its procedural posture.

RESEARCH EVIDENCE

Study result with design, population, duration, and causal limits preserved.

**PITHY SIGNAL
ANALYSIS**

Editorial synthesis or working model; never presented as regulatory taxonomy.

EDITORIAL CONCLUSION

Whether an AI simulates or sustains an interpersonal relationship should become a classification and control question before harmful interactions become incidents.

SELECTED CITED WORKS

Primary and authoritative sources

CA-SB243 / Enacted law - [California SB 243, Chapter 677](#)

NY-GBL47 / Enacted law - [New York General Business Law Article 47](#)

WA-RCW19440 / Enacted law - [Washington RCW 19.440](#)

OR-SB1546 / Enacted law - [Oregon SB 1546 enrolled](#)

FTC-6B-2025 / Enforcement activity - [FTC inquiry into AI chatbots acting as companions](#)

APA-ADVISORY-2025 / Authoritative professional guidance - [APA health advisory on chatbots and wellness applications](#)

NIST-AI6001 / Regulatory guidance - [NIST Generative AI Profile](#)

FED-TPRM-2023 / Regulatory guidance - [Interagency Guidance on Third-Party Relationships](#)

OPENAI-MIT-2025 / Research evidence - [Affective use and emotional well-being study](#)

NMI-PRIMING-2023 / Research evidence - [Beliefs about AI and perceived trust, empathy, and effectiveness](#)

META-HUMANLIKE-2025 / Research evidence - [Meta-analysis of human-like design cues](#)

GARCIA-ORDER-2025 / Litigation - [Garcia v. Character Technologies pleading-stage order](#)

GARCIA-DISMISSAL-2026 / Litigation - [Garcia dismissal after settlement notice](#)

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