



April 3, 2023

Chair Lina M. Khan (@linaKhanFTC)
Commissioner Rebecca Kelly Slaughter (@RKSlaughterFTC)
Commissioner Christine S. Wilson (@CSWilsonFTC)
Commissioner Alvaro Bedoya (@BedoyaFTC)

Dear Chair Kahn, Commissioner Slaughter, Commissioner Wilson, and Commissioner Bedoya.

Enclosed is a formal complaint to the Federal Trade Commission. We urge the Commission to open an investigation into OpenAI and the commercial product GPT-4. We ask the Commission to halt further commercial deployment of GPT by OpenAI, pending the establishment of necessary safeguards.

We urge you to read our Complaint carefully. We also urge you to read the System Card and the Technical Report, provided by OpenAI, accompanying the release of GPT-4. The company itself has said that its product will be used for “Disinformation and influence operations,” the “Proliferation of conventional and unconventional weapons,” and “Cybersecurity attacks.” OpenAI has also warned that “AI systems will have even greater potential to reinforce entire ideologies, worldviews, truths and untruths, and to cement them or lock them in, foreclosing future contestation, reflection, and improvement.”

The FTC has previously declared that the use of AI should be “transparent, explainable, fair, and empirically sound while fostering accountability.” GPT-4 satisfied none of these requirements. You have also said, “Merely warning your customers about misuse or telling them to make disclosures is hardly sufficient to deter bad actors.” OpenAI intends to disclaim liability for the consequences of the commercial release of its product GPT-4.

Alarm bells should be ringing.

Thank you for your prompt consideration of this matter.

Sincerely yours,

A handwritten signature in blue ink that reads "Marc Rotenberg".

Marc Rotenberg
CAIDP President
CAIDP General Counsel

A handwritten signature in blue ink that reads "Merve Hickok".

Merve Hickok
CAIDP Chair
CAIDP Research Chair

Cc: Senator Maria Cantwell, Chair, Senate Commerce Committee (@SenatorCantwell)
Senator Ted Cruz, Ranking Member, Senate Commerce Committee (@tedcruz)
Rep. Cathy McMorris Rodgers, Chair, House Commerce Committee (@CathyMcMorris)
Rep. Frank Pallone, Ranking Member, House Commerce Committee (@FrankPallone)