
From: Wiatrowski, William - BLS
Sent: Friday, April 29, 2022 4:38 PM
To: aiframework
Cc: Wiatrowski, William - BLS
Subject: Comments on AI framework

Good afternoon,

I am the Deputy Commissioner at the Bureau of Labor Statistics, an agency of the U.S. Department of Labor, but I am providing comments on the AI framework from the point of view of the U.S. statistical system, which is made up of many agencies across government. I'm afraid we became aware of this review just recently and therefore only have a few comments. We plan to keep track of this work going forward and take advantage of future opportunities to comment.

The treatment of bias seems inadequate. It should be more concrete. And it should emphasize more of the technical dimensions. How is bias related to accuracy? Prediction errors can be more or less biased, and therefore have more or less disparate impacts. How can bias risk be managed? There's an assertion that "bias is not always a negative phenomenon." When is it not? Social issues aside, isn't bias always bad statistically? This should be explained, or deleted.

Do the identified risks adequately capture all possible major, negative unintended/collateral impacts? Sometimes AI might be harmful because it is too ***good.*** For example, it might sell people on things that are bad for them or for society. Think about the refinement and spread of false information, for example. Maybe this is a risk that AI can be misused. It raises potential for both profit and harm.

Last is the risk of manipulability. We hear anecdotes about how favored candidates might be tipped off or figure out how to gain unfair advantage by knowing the right incantations to dupe the algorithm.

Finally, several reviewers thought, despite the aim to "use clear and plain language," that the framework was difficult to read. We encourage careful review and editing, perhaps among those less knowledgeable of the topic area.

We hope these comments are helpful.

William Wiatrowski
Deputy Commissioner
Bureau of Labor Statistics

