Atlassian’s Response to the Request for Information Related to NIST's Assignments the Executive Order Concerning Artificial Intelligence

Atlassian welcomes the opportunity to provide input to the National Institute of Standards and Technology (NIST) concerning implementation of the [Executive Order on Safe, Secure, and Trustworthy Development and Use of Artificial Intelligence](https://www.federalregister.gov/documents/2023/11/01/2023-24283/safe-secure-and-trustworthy-development-and-use-of-artificial-intelligence) (AI EO). Our comments focus on Section 11(b) of AI EO and specifically its instruction to the Secretary of Commerce concerning an international engagement plan to support the development and adoption of AI standards. Our perspectives reflect our role as a provider of globally-deployed AI systems that we develop on top of frontier models, which are utilized by over 260,000 customers across a breadth of industries.

Atlassian is an enterprise software company guided by a singular mission: to unleash the potential of every team. Our products help teams organize, discuss, and complete shared work – delivering superior outcomes for their organizations. The Atlassian platform is the common technology foundation for our products that drives connection between teams, information, and workflows. It enables team collaboration seamlessly across tools, automates the mundane so teams can focus on what matters, and supports better decision-making based on the data customers choose to put into our products.

1. Atlassian’s AI journey: our principled approach to product-led growth

In 2023, Atlassian announced significant steps forward in our AI journey. In April 2023, we announced the general availability of [Atlassian Intelligence](https://www.atlassian.com/software/artificial-intelligence), which combines state-of-the-art models developed by third-parties like OpenAI with the power and data inside the Atlassian platform. Through Atlassian Intelligence, we provide a native artificial intelligence experience that is contextual to our customers, their teams, and their workflows, supported by processes and procedures that respect our privacy obligations to our customers and their expectations.

We also shared our principled point of view on responsible technology governance, and we further explained how we are putting our principles into practice. In parallel with the launch of Atlassian Intelligence, we published our [Responsible Technology Principles](https://www.atlassian.com/trust/responsible-tech-principles), the framework we use internally to ensure we’re being thoughtful about our development and use of new technology. Our Responsible Technology Principles were heavily informed by, and designed to align with, a number of similar principles embedded in frameworks globally. But they are also uniquely Atlassian. We drew on our [company mission and values](https://www.atlassian.com/company/values) as well as our commitments to our customers, employees, and stakeholders.

We also published our [Responsible Tech Review Template](https://wac-cdn.atlassian.com/dam/jcr:17c02c74-a625-40c2-9595-bc78aa71994e/Atlassian%20Responsible%20Technology%20Review%20Template.pdf?cdnVersion=1412) to demonstrate how we are translating principles into practice. The template is our guide for hands-on work by teams across Atlassian who are on the front lines of ensuring that our products, services, and operations adhere to our principles. Building on our template, we recently published our [No BS Guide to Responsible Tech Reviews](https://wac-cdn.atlassian.com/dam/jcr:91e0a2aa-35a2-4bb1-9735-5d84bb15877c/Atlassian%20No%20BS%20Guide%20to%20Responsible%20Technology%20Reviews_Jan2024.pdf?cdnVersion=1424), which describes our learnings from applying our template across Atlassian. By open-sourcing our principles, template, and sharing our lessons, we aim to encourage feedback and collaboration across stakeholder communities about the impacts of technology, and especially AI.

1. Our recommendations for engagement in international AI standards development

We believe that the Administration’s forthcoming strategy for the advancement of AI standards should recognize three imperatives for evolution of the AI ecosystem.

Support the development of auditable management systems standards. Economic growth across the AI value chain depends on trustworthy and transparent processes that enable organizations to demonstrate application of AI governance measures. Standards will be foundational to these processes just as they have been to privacy, cybersecurity, and other domains where organizations seek to verify actions taken by their suppliers, partners, and other entities.

The Administration’s international strategy should support the development of auditable standards related to AI governance. Management systems standards that emphasize outcome-focused governance are especially important as they are significant tools in the technology ecosystem to demonstrate an organization’s compliance posture. International standards bodies, like the International Standards Organization (ISO), are well positioned to lead on development of auditable standards and ISO’s work in this domain reflects promising progress.

To drive adoption and implementation of these standards, the strategy should anticipate the need for industry engagement to facilitate the on-boarding of new controls. For example, with development and deployment of AI being an inherently collaborative effort across teams (and often across companies), there will be opportunities to embed governance measures into tools that are utilized across the software development ecosystem. Additionally, the strategy should anticipate that the NIST AI Risk Management Framework (AI RMF) would need to be updated with informative references that map connection points with the RMF. We recognize that NIST has already published two [crosswalk analyses for the AI RMF](https://www.nist.gov/itl/ai-risk-management-framework/crosswalks-nist-artificial-intelligence-risk-management-framework) that set the stage for future work in this space. Crosswalks will help AI stakeholders see the value in applying AI governance measures, as steps taken to address elements of the AI RMF would also be relevant to compliance with new standards (and vice versa).

Engage deeply in initiatives outside of standards development organizations. The strategy should approach international engagement with a broad aperture. Global norms and expectations for AI governance are percolating across a range of multilateral and multi-stakeholder organizations.  For example, the concepts, definitions, and governance models developed through organizations like the Organization for Economic Cooperation and Development (OECD) were cited as foundational inputs in the AI RMF alongside outputs from traditional standards development organizations (SDOs) like ISO. Since the AI RMF was published, new initiatives like the Hiroshima Process and the forthcoming EU AI Pact show that AI governance will continue to be shaped by programs outside of traditional SDOs.

The strategy should plan for deep engagement in forums outside of traditional SDOs to influence the development of norms and expectations for AI governance, which in turn will manifest in standards. It will be critical to align terminology and definitions across these initiatives as well as driving towards common understandings of potential harms and technical and non-technical mitigations. In the near term, implementation of the EU AI Act will generate an a wave of standards development to support the Act’s conformity assessment program. This should be among the Administration’s priorities in its engagement strategy.

Build upon US leadership in AI standards development. The AI EO instructs that the forthcoming strategy should advance the underlying principles of the AI RMF. Today, the US holds a global leadership position in its articulation of a broad and flexible governance framework for AI that stands apart from regulatory initiatives. The AI RMF stands as a demonstrable example of US government engagement with industry, civil society, and other stakeholders that has further burnished NIST’s reputation for constructive dialogue across technical and non-technical domains.

In advancing the underlying principles of the AI RMF, the strategy should take into account not only the substantive elements of the framework (i.e., the “what”) but also the engagement methods utilized by NIST to convene, mobilize, and maintain engagement with a broad audience (i.e., the “how). Indeed, as NIST has built upon its first iteration of the AI RMF, NIST has convened working groups on topics such as generative AI systems and other more discrete areas of AI governance. This iterative and increasingly targeted approach demonstrates an awareness that once foundational elements of governance models are set, honing in on their application in particular use cases provides valuable guidance. The international strategy should plan for a similar phased approach.

1. Our invitation for further dialogue

We appreciate the opportunity to provide input to NIST and we welcome further dialogue with NIST and the AI stakeholder community on our recommendations. We stand ready to share more about our approach to responsible technology governance and how we’ve navigated through the landscape of AI governance measures to develop our own governance model. We look forward to ongoing engagement on these important initiatives as the Administration continues to implement the AI EO.