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AI-Standards
National Institute of Standards and Technology
100 Bureau Drive, Stop 2000
Gaithersburg, MD 20899

**Re: U.S. Leadership in AI: A Plan for Federal Engagement in Developing
          AI Technical Standards and Related Tools**

To Whom It May Concern:

The U.S. Chamber Technology Engagement Center ("C_TEC") respectfully submits the following comments to the National Institute of Standards and Technology ("NIST") in response to its request for comment in the above-referenced proceeding, the draft "U.S. Leadership in AI: A Plan for Federal Engagement in Developing Technical Standards and Related Tools" ("the draft plan").

C_TEC commends the Administration and NIST for taking a leadership role in advancing the draft plan and strengthening the United States' position in respect to artificial intelligence ("A.I.") technical standards and tools. Also, C_TEC applauds the draft plan's recognition that A.I. technical standards are consistent with PL 104-113 and OMB Circular A-119 so that they will be voluntary, consensus-based, and driven by the private sector. In these comments, C_TEC highlights several components of the draft plan pertaining to interagency coordination, development of A.I. ethics standards, and global standards cooperation.

I. Interagency Coordination on A.I. Standards Development

Advancing A.I. standards will require significant cooperation and coordination within the relevant federal agencies. The draft plan appropriately acknowledges the need for both horizontal standards (standards applied across sectors and applications) and vertical standards (standards that focus on specific

sectors or applications, such as safety assurance for automated driving systems). C_TEC supports the draft plan's recommendation that the National Science and Technology Council's Machine Learning/Artificial Intelligence Subcommittee designate a Standards Coordinator. A Standards Coordinator will be critical to ensure that the development of application and sector-specific vertical standards remain consistent to the maximum extent practicable with the development of horizontal standards. In addition, federal agencies, when considering whether to engage on the development of vertical standards, should be cognizant of planned and ongoing efforts – as well as existing rules and regulations – and focus on gaps to develop horizontal standards that may inform the development of a particular vertical standard.

II. Research for Standards and Standards-Related Tools

C_TEC applauds the draft plan's recommendation on promoting research to further the development of A.I. standards and tools. The draft plan noted that there are a number of ongoing activities relating to the development of standards for societal and ethical considerations. In terms of developing standards for ethical and societal considerations, it is important to distinguish between technical standards and non-technical standards. Not all major societal and ethical issues can be addressed with developing technical standards, so research funding agencies, especially the National Science Foundation, can encourage the development of non-technical standards through a multidisciplinary research approach. To ensure consistency, the development of non-technical standards should be voluntary, consensus-based, and be led by non-federal stakeholders.

III. International Leadership on A.I. Standards

C_TEC and the U.S. Chamber's International Division strongly supports the draft plan's recognition that the United States must be an international leader on the development of A.I. standards. The draft plan notes that several standards – including those focused on concepts and terminology, trustworthiness, governance, and societal and ethical standards – still remain in development. Global cooperation and coordination on these standards and others will be critical to ensure that there is a consistent set of "rules of the road" to enable market competition, preclude barriers to trade, and allow innovation to flourish. The recent release of AI principles by the Organization for Economic Co-operation and Development ("OCED") represents an important step to international collaboration to ensure governments around the world take a responsible, but measured policy response that nurtures A.I. In order to advance the OECD outcome and engage bilaterally with key foreign partners, the federal government should ensure cooperation and coordination across relevant federal agencies and partner with private sector stakeholders to continue to shape international dialogues and A.I. standards development.

IV. Conclusion

This draft plan is a critical step to advance the responsible development of deployment of A.I. applications to ensure the United States retains its international leadership in A.I. C_TEC also applauds NIST for its inclusive approach in developing this draft plan and looks forward to working with NIST and other federal agencies to ensure the timely and effective implementation of the draft plan.

Respectfully submitted,

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