

Comment Template for Draft Plan for Federal Engagement in Developing Technical Standards and Related Tools for AI Technologies

COMMENT #	NAME OF COMMENTER	TYPE i.e., Editorial Minor Major	LINE # PAGE etc.	RATIONALE for CHANGE	PROPOSED CHANGE (specific replacement text, figure, etc. is required)
1	D. Ponikvar	Editorial	Line 35	Missing hyphen	Should read "agreed-upon"
2	D. Ponikvar	Editorial	Line 49	Extraneous word	Should read "considered to comprise software and/or hardware..."
3	D. Ponikvar	Editorial	Line 54	Missing comma	Should read "facial recognition systems, as well as..."
4	D. Ponikvar	Editorial	Line 76	Missing comma	Should read "interoperable, and efficient..."
5	D. Ponikvar	Editorial	Line 79	Missing comma	Should read "reliably, and safely."
6	D. Ponikvar	Editorial	Page 8, Table 1	Inconsistent format between Tables 1 and 2.	Add vertical dividers between the cells of Table 1 to reflect the formatting of Table 2.
7	D. Ponikvar	Minor	Page 8, footnote 7	List is incomplete	Add "data formats" to the list of data standard requirements
8	D. Ponikvar	Editorial	Page 8, footnote 11	Improper verb	Change "consists" to "consist"
9	D. Ponikvar	Minor	Line 200	Clarification of potential testing requirements and methodologies	Add a sentence to the Testing methodologies bullet: "Consistent testing may also require a capability for re-initialization of AI systems (to reset to a condition before exposure to training data)."
10	D. Ponikvar	Editorial	Line 289	Missing comma	Should read "procedures, and policies..."
11	D. Ponikvar	Editorial	Line 294	Clarification of cross reference	Change "See text box" to "See Multichannel Standards development text box"

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12	D. Ponikvar	Minor	Page 12, footnote 21	Redundant (the document title is in the footnoted text)	Change footnote to read: ²¹ Available at https://www.whitehouse.gov/sites/whitehouse.gov/files/omb/circulars/A119/revised_circular_a-119_as_of_1_22.pdf
13	D. Ponikvar	Minor	Page 13, text box (lines 323-336)	Simplification of the reference, consistency of formatting with other such references in the document	Remove quotes around the text. Remove the hyperlink references from the text box. Add footnote to the title "Wanted: Nimble, Multi-Channel Standards Development". Footnote should read: Text extracted from the IEEE response to the NIST RFI. Available at http://www.nist.gov/sites/default/files/documents/2019/05/28/nist-ai-rfi-ieee_001.pdf
14	D. Ponikvar	Minor	Line 367	Clarification. This section <u>defines</u> the levels of engagement... it doesn't <u>prioritize</u> them. The <u>priority</u> of engagement will be case-specific (depending on perceived government needs).	Change "PRIORITIZING LEVELS..." to "DEFINING LEVELS..."
15	D. Ponikvar	Minor	Line 402	Missing step in the engagement process.	Insert new step in the list (and renumber subsequent steps): ii. Identify the appropriate level of engagement: see section 2(B).
16	D. Ponikvar	Editorial	Page 15, footnote 24	Typo	Footnote should read: ²⁴ AI using standards to mitigate risks...
17	D. Ponikvar	Editorial	Line 463	Clarification	Spell out acronym (OMB-OIRA)
18	D. Ponikvar	Editorial	Line 480	Duplicate period at end of sentence	Remove duplicate period
19	D. Ponikvar	Editorial	Line 487	Missing comma	Should read "AI technologies, and cultivate..."
20	D. Ponikvar	Editorial	Line 522	Improper verb	Change "performs" to "perform"
21	D. Ponikvar	Editorial	Line 531	Missing comma	Should read "process, and apply..."

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22	D. Ponikvar	Minor	Page 28, Appendix IV	The approach used to develop the plan embodied in this report is not germane to the final plan presented in the document. This info is more relevant as background in a summary briefing that introduces the document, but not as part of the plan itself.	Delete Appendix IV
23	D. Ponikvar	Minor	Page 30, Appendix V	The content of the RFI used to collect some of the data that fed this plan is not germane to the final plan presented in the document. This info is more relevant as background in a summary briefing that introduces the document, but not as part of the plan itself.	Delete Appendix V