

**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	Jamie Ferguson	Editorial	Line 122 Page 6	Provide additional detail and clarity around technical standards development in AI.	Additional text: In AI, there is a need to establish both “horizontal” standards (standards that are applied consistently across all sectors) as well as “vertical” standards, developed within a specific sector to address unique needs. Health care is a good example of such sector-specific standards, where accuracy, reliability and safety are paramount.
2	Jamie Ferguson	Minor	Line 173 Page 8	Include three additional important areas of standards development	Additions to Table 1: Usability Interoperability Accuracy/Reliability
3	Jamie Ferguson	Minor	Line 471 Page 17	Three key additions to the Draft Plan for Federal agency involvement, as outlined in recommended action #1.	Additional text: <ul style="list-style-type: none"> <li>• Address the uneven level of readiness and capacity of federal agencies to participate in national and international standards development processes.</li> <li>• Develop guidance for federal agencies to ensure adequacy and consistency in the approach agencies use to participate in SDOs and processes</li> <li>• Identify a lead office within each major agency responsible for its engagement in AI development</li> </ul>
4	Jamie Ferguson	Minor	Line 488 Page 17	Areas that should be included in research on metrics related to trustworthy attributes as described in recommended action #2.	Additional text: <ul style="list-style-type: none"> <li>• Prioritize research on metrics related to trustworthy attributes; include, at a minimum, the following areas: Usability, Interoperability, Accuracy/Reliability, Safety, Performance, Data Readiness, Appropriateness of Human Interaction, and Ethical Considerations.</li> </ul>

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5	Jamie Ferguson	Minor	Line 506 Page 17	Additional area of emphasis in recommended action #3.	Additional text: <ul style="list-style-type: none"> <li>Address the uneven level of readiness of federal agencies to engage in standards development.</li> </ul>
6	Jamie Ferguson	Minor	Line 507 Page 18	Recommended action #4 should include both national and international focus, including broadly engaging in the development of U.S. National Standards that may also be adopted internationally.	4. Strategically engage with national and international parties to advance AI standards for U.S. economic and national security needs.