



July 18, 2019

Elham Tabassi  
National Institute of Standards and Technology  
100 Bureau Drive, Stop 200  
Gaithersburg, MD 20899

Enclosed: Comments within NIST Template

Dear Ms. Tabassi,

1. Thank you for the opportunity to submit comments in response to the National Institute of Standards and Technology's (NIST) draft U.S. Leadership in AI: Plan for Federal Engagement in Developing Technical Standards and Related Tools. We have one major comment and one minor comment for your consideration. These comments are also enclosed in your formatted template.
2. Background. Please recall that More Cowbell Unlimited submitted an extensive [Technical Paper](#) in response to your original request for information on artificial intelligence (AI) standards. In the paper, we assert that the United States and the West in general are at significant Information Warfare (IW) risk due to weaponized AI and other factors. This is based upon our review of the literature, independent research, and decades of military, and data science experience. We recommend, therefore, the Federal government work closely with the private sector--especially critical infrastructure participants--to develop a comprehensive official IW Defense (IW-D) standard to protect America from current and growing weaponized AI threat.
3. Major Comment. This comment applies to APPENDIX II (AI STANDARDS). In your draft, this appendix contains "examples of activities provided by respondents to the NIST Request For Information." Until the Federal government marshals resources for an official IW-D standard, [More Cowbell Unlimited's FOCAL IW-D Standard™](#) should be mentioned in this appendix, along with the other relevant standards efforts provided by respondents. Per the President's directive, the FOCAL IW-D Standard™ is innovative, freely available, and contains cutting edge technical activities which help protect organizations and even entire societies from IW attack. The FOCAL IW-D™ Standard is divided into five interlocking tenets which help organizations understand IW, shift culture, train the workforce, identify vulnerabilities with process technologies, prepare for and recover from attack, and contribute to the community as a vested stakeholder. Finally, public/private organizations may use the free version of our [Cloud SaaS Process Mining Software](#) as an integral part of their IW-D programs.
4. Minor Comment. We understand NIST wishes to engage the international community during this effort. We came across another effort that may be worth mentioning. The European Committee for Standardization (CEN) recently released their draft [Journalism Trust Initiative](#) (JTI) for public comment. JTI is developing standards for trustworthiness in the information space to support the universal, individual freedom of opinion through access to information and independent, pluralistic media. This CEN standard is complementary with IEEE's P7011 - Standard for the Process of Identifying and Rating the Trustworthiness of News Sources, which is mentioned in your draft.
5. More Cowbell Unlimited is standing by and ready to assist.

  
John Bicknell  
CEO, More Cowbell Unlimited, Inc.

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

| COMMENT # | NAME OF COMMENTER                           | TYPE<br>i.e.,<br>Editorial<br>Minor<br>Major | LINE #<br>PAGE<br>etc.     | RATIONALE for CHANGE   | PROPOSED CHANGE<br>(specific replacement text, figure, etc. is required)   |
|-----------|---|--|----------------------------|--|--|
| 1         | John Bicknell<br><br>More Cowbell Unlimited | Major  | APPENDIX II (AI Standards) | <p><b>APPENDIX II AI STANDARDS.</b> In your draft, this appendix contains “examples of activities provided by respondents to the NIST Request For Information.” Until the Federal government marshals resources for an official IW-D standard, <a href="#">More Cowbell Unlimited’s FOCAL IW-D Standard™</a> should be mentioned in this appendix, along with the other relevant standards efforts provided by respondents. Per the President’s directive, the FOCAL IW-D Standard™ is innovative, freely available, and contains cutting edge technical activities which help protect organizations and even entire societies from IW attack. The FOCAL IW-D™ Standard is divided into five interlocking tenets which help organizations understand IW, shift culture, train the workforce, mitigate vulnerabilities with process technologies, prepare for and recover from attack, and contribute to the community as a vested stakeholder.</p> | <p><b>In APPENDIX II add:</b></p> <p><b>More Cowbell Unlimited</b><br/>More Cowbell Unlimited developed the <a href="#">FOCAL Information Warfare Defense (IW-D) Standard™</a> based upon independent research, and decades of military and data science experience. Public and private critical infrastructure participants, Federal governmental agencies, state and local governments, grassroots efforts, and entire nations may use the standard and manage the IW threat which is fueled by weaponized AI. A <a href="#">technical paper</a> accompanies the standard, which includes an IW Attack and IW Defense Model and an Appendix with scenarios. The FOCAL IW-D™ Standard is divided into five interlocking tenets which help organizations understand IW, shift culture, train the workforce, mitigate vulnerabilities with process technologies, prepare for and recover from attack, and contribute to the community as a vested stakeholder. Interested parties may request a free copy of the FOCAL IW-D™ Standard and access to the free version of its <a href="#">Cloud SaaS Process Mining Software</a> at the More Cowbell Unlimited website.</p> |

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| 2         | John Bicknell<br><br>More Cowbell Unlimited | Minor  | APPENDIX II (AI Standards) | We understand NIST wishes to engage the international community during this effort. We came across another effort that may be worth mentioning. The European Committee for Standardization (CEN) recently released their draft <a href="#">Journalism Trust Initiative</a> (JTI) for public comment. JTI is developing standards for trustworthiness in the information space to support the universal, individual freedom of opinion through access to information and independent, pluralistic media. This CEN standard is likely complimentary with IEEE's P7011 - Standard for the Process of Identifying and Rating the Trustworthiness of News Sources, which is mentioned in your draft. | Mention, if desired.   |