

September 29, 2022

National Institute of Standards and Technology  
US Department of Commerce

Attention: Alframework@nist.gov

Dear NIST AI RMF Committee,

Thank you for your diligence on the latest version of the AI RMF. I realize it is already very comprehensive, and I appreciate the hours of effort so many people have contributed towards this robust body of work. Given the nature of AI and per your notice, we all realize that the framework will continue to evolve as new knowledge comes to light and the AI landscape changes. With that, I would like to offer an additional perspective for your consideration as you advance the framework.

I am the AI Governance and Research Practice Lead at the Center for Inclusive Change. Having conducted a substantial amount of research in the field of third-party (buyer-side) AI governance, I would like to offer my thoughts on a few gaps and potential clarification opportunities that might be appropriate to include in future versions of the NIST AI RMF.

I am providing the following attachments for your consideration:

- Attachment A: AI Lifecycle: Transfer of Governance & Risk Control from Seller to Buyer
- Attachment B: AI Actors Across the AI Lifecycle (Revised NIST AI RMF Figure 2)
- Attachment C: AI Buyer Governance Control Taxonomy: Based on procurement type and system usage context

I appreciate the opportunity to submit these thoughts for your consideration. It is my sincere hope that they help advance our shared mission to produce responsible and trustworthy AI. Should the committee have any questions or wish to discuss any of the submitted materials, I would be happy to make myself available for further conversations.

Sincerely,

<e-signed//29/9/2022/>

Cari L. Miller