**From:** Hadley, Emily
**Sent:** Wednesday, September 21, 2022 9:45:42 AM (UTC-05:00) Eastern Time (US & Canada)
**To:** aiframework <aiframework@nist.gov>
**Subject:** Comments on AI RMF

Hello,

Thank you for the opportunity to review the AI RMF resources. I think the report and accompanying playbook are both important and valuable tools that I can see being useful in both industry and education contexts. A few comments:

From the report on page 2, this sentence: "AI systems are not inherently bad or risky, and it is often the contextual environment that determines whether or not negative impact will occur."

- Comment: *I would argue that there are numerous examples of AI systems that are inherently bad or risky, especially those developed on biased datasets. Facial recognition is a prime example of this – changing the context in which a biased facial recognition system is used does not change the fact that it itself is biased. Or if an autonomous vehicle's recognition algorithm can't recognize children, that is inherently risky no matter the context in which it is deployed. The AI system itself is bad, not just the use of it. I would also say that the view of AI systems as "not inherently bad or risky" is a pro-tech perspective which does not acknowledge a non-tech view that AI can in fact be bad or risky.*

For the playbook tool:

- I like the idea of the tool, but honestly, it's not entirely clear to me how I'm supposed to use it. It seems like a more complicated way to provide details that would be more readable in a report (like the GAO accountability framework). To justify an interactive site, I think there should be more interactivity like a search feature or checklist or substantially more details/images/figures than what would be permitted for a report. Or perhaps emphasize that it will be a living site updated with new resources
- There is a lot of information on the site that can feel overwhelming to companies that are new to this space. It would be nice to have a case study, interview, or walk through which illustrates how a smaller or new company to AI risk management could use this.
- I appreciate that this is a draft website but was also curious if accessibility or user design testing had been completed. For example:
  - The font upon opening the accordions is really small and smushed together.
  - There appears to be least 3 different font styles used and they feel like they clash
  - Using the ANDI tool, it looks like there are some accessibility concerns in the playbook for color contrast and button accessibility.
- It would be helpful to define AI actors on the Terms page (similar to how it is defined in the report)

Best,
Emily


**Emily Hadley** (she/her)
Research Data Scientist
RTI International