



September 29, 2022

BY ELECTRONIC MAIL

U.S. National Institute of Standards and Technology
100 Bureau Drive
Gaithersburg, MD 20899

Re: NEC Corporation of America Comments on the Second Draft of the National Institute of Standards and Technology AI Risk Management Framework

NEC Corporation of America (NEC) welcomes the opportunity to submit comments to the National Institute of Standards and Technology (NIST) on the second draft of the Artificial Intelligence Risk Management Framework (AI RMF) and the draft companion AI RMF Playbook (Playbook). As we noted in our September 15, 2021, and April 29, 2022, comment letters, NEC appreciates NIST's transparent, multistakeholder approach to building a flexible, adaptable, and understandable framework for mitigating risks and maximizing benefits throughout AI systems' lifecycles.

We are pleased to see the progress that NIST has already made on the AI RMF and the Playbook. We especially value the updates that provide more detailed insights into the roles of different AI actors throughout the AI lifecycle and the updates that reference additional international AI standards. Including AI RMF crosswalks with other frameworks and international standards (such as relevant Institute of Electrical and Electronics Engineers, International Organization for Standardization, and International Electrotechnical Commission standards) in the NIST Trustworthy and Responsible AI Resource Center could help organizations develop AI risk management processes and programs that incorporate recommendations from multiple standards organizations and apply across multiple countries and regions.

As NIST continues to develop the AI RMF and the Playbook, providing more detailed guidance on how to begin implementing the AI RMF recommendations would be helpful. Small and mid-sized organizations and/or other organizations that have not yet established robust AI risk management processes and programs may need to take a phased approach to adopting the recommendations in the AI RMF and the Playbook. Helping those organizations identify which recommended actions are most crucial to take and in which order to take various actions could help the organizations effectively leverage current and near-term resources to make initial progress while developing a long-term strategy for building stronger AI risk management processes and programs over time.

During the next AI RMF workshop, we look forward to learning more about the planned next steps for the AI RMF and the Playbook. As NIST continues advancing this important AI RMF initiative and related trustworthy AI efforts, NEC welcomes future opportunities to continue supporting NIST's work and to provide further input and assistance.

Sincerely,

A handwritten signature in black ink that reads "S. Takahashi". The signature is written in a cursive style with a prominent initial "S" and a trailing flourish.

Shin Takahashi
Chairman and Head of Government Relations and
Public Policy