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Ms. Elham Tabassi
National Institute of Standards and Technology
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Gaithersburg, MD 20899
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Dear Ms. Tabassi,

Thank you for the opportunity to provide feedback on the latest draft of Artificial Intelligence Risk Management Framework (AI RMF). We are pleased to see our prior comments addressed, particularly the emphasis on the potential for positive impact of AI and the importance of considering context when assessing risk and opportunity. We offer the following additional comments on the latest draft.

- The box labeled “Human Factors” on Page 12 takes a narrow view of a human’s role in an AI system. As written, the human is described solely as a decision-maker that takes in AI’s suggestions. This depiction does not allow for consideration of true human-AI teaming (such as described in the National Academies’ paper on “Human-AI Teaming: State-of-the-Art and Research Needs” <https://nap.nationalacademies.org/catalog/26355/human-ai-teaming-state-of-the-art-and-research-needs>), nor does it align with the definition of Human Factors tasks described in Appendix A on page 28. We recommend this section be rewritten to align with the view of human-AI teaming described in the National Academies study.
- In Appendix A beginning on Page 27, the alignment between the actors described and the tasks in Figure 1 is not clear. In addition, the list is a mix of technical domains (e.g., AI Design) and categories of actors (e.g., End Users). Recommend using the same terms in the Appendix as in Figure 1 and clarifying the role of the actors vs. the description of technical domains.

We appreciate the continued opportunity to engage with NIST on this important topic. If you have any questions, please do not hesitate to reach out.

Sincerely,

Dr. Amanda C. Muller
Chief, Responsible Technology