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### **RFI: Developing a Federal AI Standards Engagement Plan**

HP Inc. appreciates the opportunity to respond to the “NIST RFI for Information About Federal Engagement in Artificial Intelligence Standards”. As a strong advocate of international standardization efforts, HP welcomes any effort that encourages governments and industry to work together in an open, voluntary, industry-led environment.

#### **AI Technical Standards and Related Tools Development: Status and Plans**

In the Information Technology sector, a thoughtful approach is being taken to ensure that R&D and experimentation is allowed to advance, building out the technology prior to standardization that might hamper innovation. In October 2017, ISO/IEC JTC 1 *Information Technology* established SC 42 for standardization in the area of Artificial Intelligence. That committee has advanced work in concepts and terminology, framework for AI systems using Machine Learning, trustworthiness, bias in AI systems and decision making, use cases and Big Data. As an international, country-based organization, this work is attracting significant engagement by global industry and national government interests and serves as the baseline for the advancement of an information technology ecosystem supporting AI.

HP also recognizes the ethical system design standards work taking place in IEEE and the vast number of projects in Open Source that are developing tools for early AI development activities. The landscape is necessarily complex, providing opportunity for the advancement of technology in both established standards activities and new collaborative open source solutions that will drive innovation.

#### **Defining and Achieving U.S. AI Technical Standards Leadership**

HP Inc. finds that in the information technology space, US based multinationals are well positioned to drive successful standards projects that advance AI technology. In terms of leadership roles, the US, via the American National Standards Institute (ANSI) provides the Chairman and the Committee Manager of both ISO/IEC JTC 1 and JTC 1's SC 42. Major US consensus positions have driven the structure and the subject matter of the international work. While there may be national development of standards in other countries, it is the globally adopted, broadly implemented standards that will determine long term success. Standards leadership ought not be defined by the number of positions held nor

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contributions submitted but on the ability to bring a shared technical vision to fruition. It will be important that the inclination to lead does not result in the rapid adoption of unproven, poorly crafted standards efforts.

**Prioritizing Federal Government Engagement in AI Standardization**

HP Inc. appreciates NIST's continued support of OMB Circular A-119, *Federal Participation in the Development and Use of Voluntary Consensus Standards and in Conformity Assessment Activities*, and the resources NIST dedicates to its collaborative work with industry and academia. The USG should be well represented in standards efforts that are foundational to the safety and protection of its citizens. The development and submission of use cases that express the needs of multiple agency requirements would be especially helpful.

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