



May 31, 2019

Dr. Walter Copan
Under Secretary of Commerce for Standards and Technology
U.S. Department of Commerce
National Institute of Standards and Technology
100 Bureau Drive
Gaithersburg, Maryland 20899

RE: NEMA Comments on NIST Request for Information on Artificial Intelligence Technical Standards and Tools

Dear Dr. Copan:

NEMA is submitting comments in response to the National Institute of Standards and Technology (NIST) request for information on plans for federal engagement in Artificial Intelligence (AI) Standards.

The National Electrical Manufacturers Association (NEMA) represents nearly 325 electrical equipment and medical imaging manufacturers that make safe, reliable, and efficient products and systems serving the following markets: buildings, lighting systems, industrial products and systems, utility products and systems, transportation systems, and medical imaging.

NEMA Member companies develop Internet of Things (IoT) devices and systems capable of generating immense volumes of data. It is imperative for NEMA Member companies to turn this data into actionable business intelligence. AI enables smart device management and allows organizations to make informed decisions about products, services, and overall business strategies.

NEMA supports the direction taken by NIST to create a plan for federal engagement in the development of technical Standards and related tools in support of reliable, robust, and trustworthy systems that use AI technologies. NEMA supports an open and inclusive stakeholder process, just as NIST did when developing the *Framework for Improving Critical Infrastructure Cybersecurity*. The plan should have an international focus while maintaining U.S. leadership in AI Standards and the plan should avoid conflict and duplication with existing efforts.

NEMA looks forward to being an active stakeholder in this process. If you have any questions on these comments, please feel free to contact me or have your staff contact Steve Griffith, Industry Director, at 703-841-3297 or Steve.Griffith@Nema.org.

Respectfully,

A handwritten signature in black ink that reads 'Philip A. Squair'. The signature is written in a cursive, flowing style.

Philip Squair
Vice President, Government Relations