6/10/2019

AI-Standards
National Institute of Standards and Technology
100 Bureau Drive
Gaithersburg, MD 20899

Re: RFI: Developing a Federal AI Standards Engagement Plan

The Software & Information Industry Association (SIIA) welcomes the opportunity to provide these comments to the National Institute of Standards and Technology (NIST) in response to the May 1 Request For Information (RFI) concerning the development of a Federal AI Standards Engagement plan.

By way of introduction, SIIA is the principal trade association for the software and digital information industries worldwide. SIIA's membership (nearly 800 companies and growing) includes the global industry leaders for the digital age, including software, data analytics, and information service companies. SIIA's member companies reflect the broad and diverse landscape of digital content, including both B2B and B2C services, small specialized providers, and large multinational industry leaders.

With regards to Artificial Intelligence (AI), SIIA has long been an advocate for the development of domain-specific policy approaches to the new challenges of AI. Please see attached SIIA's comments to the European Union's High-Level Expert Group on Artificial Intelligence in response to a Stakeholders' Consultation on Draft AI Ethics Guidelines (January 2019) and to the National Science Foundation on whether the 2016 National Artificial Intelligence Research and Development Strategic Plan should be revised (October 2018). Both of these submissions speak to the fact that there is no single definition of AI, but rather the technology is utilized differently when applied to the fields of defense, health, autonomous vehicles, marketing, etc. Likewise, **SIIA believes that the risks and opportunities that come with this transformative technology must be considered in context of the specific domain in which they are applied.**

SIIA is pleased that NIST is looking into this important issue and appreciates the opportunity to provide our comments. SIIA and our member companies look forward to working with NIST and partners as the process moves forward. Please contact Jesse Spector, Director of Technology Policy, at (202) 789-4473 or jspector@siia.net for further questions or requests for further information.

Respectfully submitted,

Jesse Spector
Director, Technology Policy
Software & Information Industry Association