

June 10, 2019

Elham Tabassi,
NIST,
MS 8900,
100 Bureau Drive
Gaithersburg, MD 20899

Ref: "RFI: Developing a Federal AI Standards Engagement Plan"

Dear Elham Tabassi,

The International Federation of Inspection Agencies ("IFIA") is pleased to provide the attached comments in response to "RFI: Developing a Federal AI Standards Engagement Plan," 84 FR 18490.

IFIA is the trade federation representing the independent third-party Testing, Inspection and Certification (TIC) industry. IFIA members provide services across a wide range of sectors: consumer products, medical devices, petroleum, mining and metals, food, agriculture among others. IFIA and its sister organization CEOC International have recently merged to form the TIC Council, a global trade association that brings together a total of approximately 90-member companies and organizations active in more than 160 countries.

We appreciate the opportunity to present at the hearing. Should you have any questions, please don't hesitate to contact Roberta Telles at +1 240 507-3392 / rtelles@ifia-federation.org.

Sincerely,



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Comments submitted by the International Federation of Inspection Agencies:

Section I

Current status and plans regarding the availability, use, and development of AI technical standards and tools in support of reliable, robust, and trustworthy systems that use AI technologies:

Standards that include or address AI functionality are available at many SDOs (e.g. standards development organizations), those include organizations such as IEEE and SAE to name a few, and IFIA expects to see many more developed in the future. If we are to ensure a consistent approach to such standards development, communication and shared knowledge will be essential and federal government's participation would be very helpful in this effort. With assistance from federal agencies in disseminating information, co-hosting workshops and round tables, and participating with organizations working in this industry – it would greatly improve the ability for groups to share information and collaborate.

A benefit of this collaboration would be the ability to identify gaps and/or research and development needs where agencies could contribute or assist industry by providing support. Another benefit would be the ability to identify industries working on or struggling with similar issues and facilitating their teaming to address those issues in concert. As an example, while devices have different functions, the way that you confirm their correct functionality could be similar. By using the same process description in standards, it would allow conformity assessment bodies to use a single approach to conformity assessment and lessen the burden on industry in testing and certifying such devices.

Section II

Needs and challenges regarding the existence, availability, use, and development of AI standards and tools:

IFIA recommends that NIST and other federal agencies consider issues of privacy, safety, and security when evaluating AI standards and tools and where gaps exist, engage with industry to update standards to include these elements. AI by its nature is at risk of cybersecurity attack and

ensuring proper safeguards are in place and audited is essential. The development of AI standards should include discussion of risks and actions necessary to mitigate those risks, including periodic evaluation of compliance (e.g. conformity assessment). Evidence of compliance can be used to increase consumer trust and reliability in such products and labelling requirements can help to education consumers on the range of features and potential risks found with a given item.

Section III

The current and potential future role of Federal agencies regarding the existence, availability, use, and development of AI technical standards and tools in order to meet the nation's needs:

IFIA recommends that Federal agencies work with stakeholders to support public-private partnerships to coordinate workshops and other events for the open sharing of information and communication between parties. Many industries and stakeholders work or will work in developing and overseeing AI technologies and ensuring a robust approach to their development oversight will require joint efforts between public and private entities. Through workshops these industries can identify priority issues, contribute updates on technology developments, and map out a path forward.

IFIA recommends that Federal agencies work with stakeholders to support public-private partnerships to offer training and education on best practices and compliance to standards and regulations. Through education and outreach, industry can be better informed and prepared to address IA related issues and implement best practices in their organizations.

IFIA recommends that Federal agencies work with stakeholders to ensure the development of consensus-based voluntary standards. Consensus-based voluntary standards represent the shared voice of the industry, ensures the equal participation of all stakeholders, and allows for the agile review and update of requirements over time. Such standards also sets the baseline for development of new AI, allowing for systems to interconnect and more readily be integrated.