



**To: The Honorable Eddie Bernice Johnson, Chair  
House Committee on Science, Space, and Technology**

**The Honorable Frank Lucas, Ranking Member  
House Committee on Science Space and Technology**

**From: Jim Conrad, IEEE-USA President**

**Date: 19 February 2020**

**Re: Feedback on the *Discussion Draft* –Legislation to Establish a National Artificial Intelligence Initiative**

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Dear Chairwoman Johnson and Ranking Member Lucas,

Thank you for the opportunity to provide comments on the Committee’s draft legislation to establish a National Artificial Intelligence Initiative. We support this legislation and thank you for your recognition of AI’s societal impact, and your support for increased investment in AI-related technologies and the related workforce. Below are our comments and feedback related to specific sections of the bill.

**p.11, line 10, CO-CHAIRS, SEC. 103(b)** – The language does not state the length of each chair’s term; e.g. will it rotate yearly? We assume that the rotating basis shall coincide with each new fiscal year but ask that this be explicitly stated.

**p.13, lines 21-25, SEC.103(d)(2)(B)(iv) RESPONSIBILITIES** – While the language does require the Interagency Committee to develop a strategic plan that describes how the Initiative will provide privacy-protected data sets for AI R&D, we suggest that the strategic plan explicitly states that the Committee shall also develop a comprehensive policy on data privacy and data protection.

**p. 30, lines 4-7, TITLE III NATIONAL INSTITUTES OF STANDARDS AND TECHNOLOGY ACTIVITIES, SEC. 301(a)(4)** – The phrase, “*voluntary international standards*” is a term of art within the standards community, and means those standards which are developed by the recognized international standards bodies – e.g. International Organization for Standardization (ISO), International Telecommunication Union (ITU), and International Electrotechnical Commission (IEC). Members of these groups are governments and government representatives. By using the phrase “*voluntary international standards*,” the draft references these bodies and implies a process in which standards are developed by Member States and governments, rather than the specific process used in the United States by standards development organizations such as IEEE, ASME, SAE, and ASTM. The latter organizations use a process that is open and transparent, and not directed by Member States or

governments. We suggest using the phrase, “*voluntary global standards*” instead. This phrase implies the open, voluntary, private sector, industry-driven process specific to US standards development.

**p.30, insert after line 15** – We suggest adding, SEC.301(a)(6), “*promote creation and use of a process for the development of ethical artificial intelligence technology and systems.*” This helps to ensure that those who are developing AI and related technologies consider and use a standard process that addresses ethical considerations such as transparency, accountability and algorithmic bias from the very beginning of the technology and system development.

**p. 30, line 23** – In between “*trustworthiness*” and “*of artificial,*” we suggest inserting the phrase, “*and ethical development and use.*”

**p. 31, lines 1-5, RISK ASSESSMENT FRAMEWORK – SEC.301(b)(2)** – We suggest adding “*ethics*” to the list of established common definitions and characterizations.

**p.39 SEC.401(d) EDUCATION.** – While the draft mentions “*community college curriculum development*” in (d)(2)(A) USE OF FUNDS (p.39, lines 23-24), community colleges are not listed in the programs that shall receive award grants in (d)(1), lines 4-8. We suggest adding community colleges to eligible educational programs. Deployment of AI systems will alter the American workforce, and Community Colleges will play a prominent role in helping American workers of all kinds to navigate this transition.

We appreciate your work on this very important topic. Should you have any questions or wish to discuss these comments further, please do not hesitate to contact Erica Wissolik at (202) 530-8347 or [e.wissolik@ieee.org](mailto:e.wissolik@ieee.org).

Thank you