

1/9/2024

The Honorable Laurie E. Locascio
Director
National Institute of Standards and Technology
100 Bureau Drive, Mail Stop 8970
Gaithersburg, MD 20899-8970

Re: Request for Information (RFI) Related to NIST's Assignments Under Sections 4.1, 4.5 and 11 of the Executive Order Concerning Artificial Intelligence (Sections 4.1, 4.5, and 11) (88 Fed.Reg. 88368)

Dear Director Locascio:

The undersigned organizations, representing all sectors of the economy, including the users and developers of Artificial Intelligence (“AI”), respectfully request that the National Institute of Standards and Technology (“NIST”) grant at least a 60-day extension of the comment period for submitting information regarding NIST’s assignments within Executive Order 14410, “The Executive Order on Safe, Secure, and Trustworthy AI.”¹

The request for information solicits detailed feedback on a wide-ranging set of critical areas, including questions around “model validation and verification”, “synthetic content detection” and surrounding “economic feasibility” of these actions. Due to the complexity of these issues, and to allow for industry and other stakeholders to provide meaningful and thoughtful input, it is imperative that NIST provide an extension. Additionally, we have strong concerns that given the request for information was posted during a holiday period, there could be a substantial impact on NIST’s ability to receive informed feedback.

We appreciate the opportunity to work with NIST to provide detailed feedback on these complex issues, but doing so with the level of specificity that these important questions require will necessitate extending the comment period to allow for more thoughtful and substantive feedback.

Given the complex policy and technical issues associated with the request for information, we respectfully request a 60-day extension to allow stakeholders to provide the necessary and thoughtful comments needed to inform policies aimed at maximizing the utilization of AI while ensuring the trustworthiness of AI.

We stand ready to discuss these concerns in greater detail.

Sincerely,

Enterprise Cloud Coalition
Information Technology Industry Council (ITI)

¹ <https://www.whitehouse.gov/briefing-room/presidential-actions/2023/10/30/executive-order-on-the-safe-secure-and-trustworthy-development-and-use-of-artificial-intelligence/>

Business Roundtable

TechNet

Security Industry Association

American Banking Association (ABA)

Software & Information Industry Association (SIIA)

BSA | The Software Alliance

Computer & Communications Industry Association (CCIA)

Alliance for Digital Innovation

Operational Technology Cybersecurity Coalition

U.S. Chamber of Commerce