April 29, 2022

BY ELECTRONIC MAIL
Mr. Mark Przybocki
Division Chief, Information Access Division
U.S. National Institute of Standards and Technology
100 Bureau Drive
Gaithersburg, MD 20899

Re: **NEC Corporation of America Comments on the Initial Draft of the National Institute of Standards and Technology AI Risk Management Framework**

Mr. Przybocki:

NEC Corporation of America (NEC) appreciates the opportunity to submit comments to the National Institute of Standards and Technology (NIST) on its initial draft of the Artificial Intelligence Risk Management Framework (AI RMF). As we noted in our September 15, 2021, comment letter in response to NIST's initial Request for Information (RFI) on the AI RMF proposal, NEC appreciates NIST's transparent, multistakeholder approach to building a flexible, adaptable, and understandable framework for mitigating the risks that AI systems can pose throughout their lifecycles.

We are pleased to see the progress that NIST has already made on the AI RMF, and we have valued the insights in both the initial draft of the AI RMF and the AI RMF workshops.

As NIST continues to add detail and specificity to the AI RMF recommendations, we hope that NIST will keep working to align with and leverage existing frameworks, laws, and standards from around the world.[1] Aligning relevant components of the AI RMF with terminologies and taxonomies from existing frameworks, laws, and standards will be crucial for organizations working to simultaneously comply with existing requirements and implement the recommendations in the AI RMF. More broadly, aligning the AI RMF with existing frameworks, laws, and standards can help promote global interoperability and harmonization. Global interoperability and harmonization in AI governance and risk management can help keep compliance burdens manageable; support ongoing worldwide innovation; and expand international collaboration on AI design, development, deployment, and use. Such collaboration could enhance the demographic and disciplinary diversity of individuals and perspectives involved in AI decision-making and the fairness of that decision-making. Furthermore, close collaboration between the United States and other countries that are similarly committed to promoting robust and multifaceted AI risk management could strengthen the United States' and those countries' ability to influence global AI standards, norms, and legal requirements. In turn, this close

---

[1] For example, we hope NIST will consider working to align the AI RMF with IEEE 7000-2021 and ISO/IEC 5338. These AI system lifecycle standards are already consistent with ISO/IEC/IEEE 12207 (Software Life Cycle Processes) and 15288 (System Life Cycle Processes).

collaboration and influence could help ensure that global standards, norms, and legal requirements promote reliability, security, and respect for human rights in AI design, development, deployment, and use.

Additionally, we look forward to seeing the Practice Guide develop further and think that this regularly updated online companion resource will be helpful. Including examples of how to effectively and meaningfully involve each of the four identified stakeholder groups throughout the AI lifecycle and how to define and measure the risks of different types of harm in real-world and/or hypothetical use cases would make the Practice Guide particularly useful.

As NIST continues advancing its important AI RMF initiative and related trustworthy AI efforts, NEC welcomes future opportunities to continue supporting NIST's work and provide further input and assistance.

Sincerely,

Shin Takahashi
Chairman and Head of Government Relations and
Public Policy