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TO:

National Institute of Standards and Technology

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Submitted electronically to AIframework@nist.gov

From:

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The Head of ISO/IEC JTC1/SC42 Mirror Committee

Japan

To Whom It May Concern:

Response to NIST Request for Public Comment regarding NIST AI Risk Management Framework Initial Draft

Thank you for this opportunity to comment on the NIST AI Risk Management Framework Initial Draft. We offer the following submission for your consideration to assist moving forward:

Public Comment #1:

Overall

Does the NIST AI RMF clarify the separation of responsibilities on the governance and operational side? Could you please clarify the boundaries between organizational management, executive governance, AI governance, and AI management.

Public Comment #2:

4. Provide common language and understanding to manage AI risks (p.3, L13-14)

Comment: The terminology used in the NIST AI RMF for " taxonomy, terminology, definitions, metrics, and characterizations for AI risk" should be as compatible as possible with ISO/IEC international standards for the sake of convenience. Could you also please clarify the definition of AI and AI system in the NIST AI RMF; We assume the NIST AI RMF indicates AI systems, but if AI and AI system are intentionally used separately, could you please clarify and separate which one is indicated in each clause of the sentence.

Furthermore, "AI standards to support the European AI Act implementation (an AI Watch study) " identifies the following six international standards as Core standards:

- ISO/IEC DTS 4213.2- Artificial Intelligence - Assessment of machine learning classification performance
- ISO/IEC CD 5338- Artificial intelligence - AI system life cycle processes

- ISO/IEC DIS 23894- Artificial Intelligence - Risk Management
- ISO/IEC TR 24027:2021- Artificial intelligence - Bias in AI systems and AI aided decision making
- ISO/IEC 38507:2022- Governance implications of the use of artificial intelligence by organizations
- ISO/IEC CD 42001.2- Artificial intelligence - Management system

Could you please share your thought with us whether "Functions organize AI risk management activities at their highest level to map, measure, manage, and govern AI risks" of NIST AI Risk Management Framework shown in Figure 5 may refer to these international standards in future? Why, because, they would support AI RMF to deploy into organizational management mechanism operation wise.

Public Comment #3:
6.2 Measure (p.16, L1)

Stakeholders, we have not discussed whether it is measurable elsewhere. If someone verifies without measurement, there will be bias. If we don't include methods, bias will follow us forever. Despite trying to clarify the bias, the NIST AI RMF seems not delve into it, nor does it go into depth at this present moment.
Accountability must also be measurable. It must also be accountable for including bias. Does it make sense to measure it? Regarding the "what if" question, until now we have thought that if we measured it, it would be correct. We need to dig deeper into the measurement method.

How do we make the discussion measurable? We can contribute to the discussion. If there is a place for clarification of specific technical and non-technical aspects, we are willing to cooperate, and Japan would like to join the discussion. We believe that a process approach is also important for those areas that cannot be covered by the measurable method, and that is a verifiable approach.
Measure also has different aspects depending on the project and organization. Checking each individual project individually is burdensome and difficult. The results of the assessment are important to be understandable and also balanced.

Public Comment #4:
6.4 Govern ; Table4 ID5 (p.19, L1)

Comment: The Initial Draft of the NIST AI Risk Management Framework goes to great lengths to define stakeholders. However, we only see stakeholders referenced once in the Govern function. We think stakeholder-related activities should be also highlighted further in the Govern function. However, the AI RMF, including the Govern function, needs to be at an appropriate level that is purpose-driven, not excessive, and feasible to ensure that it does not become an excessive operational burden or investment for stakeholders, including barriers to entry and AI providers. The reason behind this is that it is important to know from whose perspective AI governance and also, we think it is important to share wherever if practical as an "AI governance ecosystem" with each other from the perspective of various stakeholders, including the community,

whether the AI system is used as expected in end-use.)

Respectfully submitted,

(General Lead of the committee)

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