July 1, 2019

Comment Template for Draft Plan for Federal Engagement in Developing Technical Standards and Related Tools for AI Technologies

COMMENT #	NAME OF COMMENTER	TYPE i.e., Editorial Minor Major	LINE # PAGE etc.	RATIONALE for CHANGE	PROPOSED CHANGE (specific replacement text, figure, etc. is required)
1	B Israelsen	Editorial	Line 25	Extra "is"	Remove "is" from "...standards is needed"
2	B Israelsen	Editorial	Line 53	Implies that the entire field of "biomedical research" is an example of AI	Mention specific methods in biomedical research that are examples of "AI"
3	B Israelsen	Minor	Line 326	Is "Open Source" a proper noun? I think it is more of a software development concept, but I may be missing something. I don't think that open source needs to be specifically mentioned. I think what you're trying to say is that we need some kind of open community resource, that might be inspired by open source (i.e. comments and contributions from community members that can be "merged" into the "code" by the core developers, or standards bodies in this analogy). It seems like this kind of idea already exists to some extent in standards development (for example NIST hosted a workshop, got feedback and did the RFI to gather community opinion), but without the powerful online software tools that aid in "version control" (i.e. being able to release new versions almost instantaneously), "pull requests" (i.e. ability of community member to present a change to the developers that can be added to the official source), and several others.	Perhaps mention that "robust community involvement" is really referring to the need to upgrade the current standards development tools/practices that already exist. This improvement is needed because the pace of technological development is far more rapid that with other technologies we've seen to date. In improving these tools we can take inspiration from the open source software community and their tools, but those tools will have to be adapted to this very different task. I think the key similarity between SDOs and the open source community is that they want a large, self-organizing, community to be able to participate in development of a product that is continuously being refined, built-on, and improved. Online tools can be used to enable this, and the open source software community has several tools and approaches that may provide inspiration for similar tools in the standards community.
4	B Israelsen	Minor	Line 363	This is probably the most critical role I think NIST can help with. We need help as a community to rally around some kind of common terms and concepts before we can move forward.	Put this in bold ☺… j/k I think you address this to some extent in the "Leading" bullet point on Line 384