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	Vince Jeffs - Vincent.jeffs @pega.com	Minor	63	Objectivity is an important characteristic not listed. This means that the AI isn't making biased (possibly unethical) decisions / recommendations	Insert "objectivity" into list of words on this line. So it would now read: "accuracy, **objectivity**, reliability, robustness, …"
2	Vince Jeffs - Vincent.jeffs @pega.com	Major	173	The table is missing an important technical standard. That is, algorithm standards, especially for portability and exchange. Analytics is mentioned only in association with big data, but adding another row for "Algorithms" would cover the standards by which advanced analytical models can be shared, such as PMML for traditional models, and emerging algorithm exchange standards for Deep Learning like ONNX, POJO, and MOJO	Insert in table another row: Algorithms and Advanced Analytics Mark as both available and being developed
3	Vince Jeffs - Vincent.jeffs @pega.com	Minor	377	The government's role in monitoring standards should include monitoring voluntary standard adoption to help telegraph whether the standard is catching on and thus broadly useful and likely to succeed (and become a widely adopted standard)	Adjust bullet to read as follows: • Monitoring: Following either a specific standards effort or broader programs, gauging adoption, and evolving standards being produced by SDOs to address unique needs or interests.
4	Vince Jeffs - Vincent.jeffs @pega.com	Editorial	480	Double period at end of sentence	Remove one of the periods.

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