Comments on the second draft of the NIST AI Risk Management Framework

September 29, 2022

AI Quality Management (AIQM) Research Project,

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Dear authors,

We are glad to see your second draft for the AI Risk Management Framework. We are

interested in the quality management of artificial intelligence implementations.

After reading your draft, we would like to make the following comments:

1. We are waiting to see two more sections of your draft AI RMF Playbook, Measure and Manage,

and we hope to have an opportunity to comment on those before the final publication. Those

will be primarily related to our public activity in documenting AI quality management

methodologies.

2. Although both AI RMF and AI RMF Playbook are intended to be used as voluntary material,

it will be desirable that there will be some rough harmonization on suggested actions for AI

risk management, especially those documented in materials from several different global

regions. Without that, implementers will have difficulty deploying their products globally.

For that purpose, we are willing to provide our AI quality management guideline as a

possible source of information. We also appreciate comments/inputs to our guideline from

global stakeholders, including NIST and other US public/private parties. We are also trying

to harmonize our activity with standardization efforts in Europe and ISO/IEC.

Our guideline documents are publicly available from

https://www.digiarc.aist.go.jp/en/publication/aiqm/guideline-rev2.html.

Some of our results are also included into the current draft for ISO/IEC DTR 5469.

Best regards,

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