TransUnion

October 15, 2020

National Institute of Standards and Technology
100 Bureau Drive
Gaithersburg, Maryland 20899

Re: Request for Comments on Four Principles of Explainable Artificial Intelligence

Sent via electronic delivery to: explainable-AI@nist.gov

To Whom It May Concern:

TransUnion welcomes the opportunity to respond to NIST's request for comments and supports its efforts to develop standards and tools for trustworthy artificial intelligence (AI)[1]. As a global information and insights company, we provide data and AI models to business customers that make decisions that impact a consumer's ability to access credit, employment, housing, and other opportunities. As such, we are well-positioned to provide comments as an innovator of new use cases where AI systems can deliver incremental benefits to stakeholders over existing decision processes and an enabler of more accurate, fair, predictive, transparent and rapid decision-making outputs.

TransUnion has implemented and promoted the use of several explainable AI methodologies and principles, including the use of regularization methods (as parsimonious models tend to be easier to explain), the use of visualization aids, and the use of per-decision explainable AI algorithms. These methods enable us to enhance model understandability and simplicity without sacrificing predictive power and better understand the relationship of each attribute with respect to the final model. We maintain an open and flexible stance on which methods to use for any given model, with the goal of maximizing performance while meeting or exceeding the desired threshold for explanation. We also embrace the philosophy that AI models should be as predictive as possible while minimizing the potential for unintended bias. To achieve this, we follow a rigorous governance process, with formal documentation, including technical peer reviews and Legal and Regulatory Compliance assessments to vet decision solutions for unintended impact certain model features may create.

TransUnion generally supports the content of NIST's draft paper and recommends two targeted clarifications[2]. First, we recommend that NIST reinforce the principle that AI systems should be as accurate as possible, while simultaneously minimizing the level of unintended bias to promote AI system designs that reduce the risk of unexpected consequences. Additionally, TransUnion anticipates that the NIST paper may influence the content and language of future possible regulatory guidance on explainable AI. As such, we believe that NIST should advocate for a principles-based approach to the potential writing of regulatory guidance regarding explainable AI and should clearly indicate that any specific methodologies described in the paper are meant to be examples and do not imply a prescription or preference.

[1] TransUnion defines AI as decision systems that leverage machine learning methods to derive decision rules from data in an intelligent manner without direct programming.

[2] The changes referenced herein pertain to Section 7 of the NIST paper.

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TransUnion looks forward to continuing to work with NIST in its efforts to develop best practices for AI and as it contemplates an appropriate regulatory framework. If you have any questions, please contact Rachel Goldberg, Head of U.S. Government Relations, at Rachel.Goldberg@TransUnion.com.

Sincerely,

Michael Umlauf
Vice President, Data Science and Analytics
TransUnion