Subject:Draft NISTIR8312 Comments - DEEL TeamDate:Thursday, October 15, 2020 at 9:26:06 AM Eastern Daylight TimeFrom:CAPELLE MikaëlTo:NIST Explainable AICC:FLANDIN GrégoryAttachments:Draft-NISTIR8312-comments.xlsx

Hi,

I am a member of the Dependable Explainable Learning (DEEL, <u>https://www.deel.ai/</u>) team, which is a transatlantic project working on the use of machine learning, and in particular neural networks, in critical systems (aeronautics, automotive, railways, ...). In the frame of the project, we are actively investigating the explainability of machine learning systems, and have a group of researchers, engineers and data-scientists dedicated to it.

We read your draft (NISTIR 8312) in details and first would like to thank you for giving us the opportunity to comment on it.

We found the document very well-written, interesting, and mostly aligned with our vision of explainability for machine-learning systems. We propose a series of comments in the attached document, together with a series of references we find interesting and that the document could benefit from.

We hope these comments will help you improve the quality of this document. We remain available if you have any questions regarding them, or if you'd like clarification. We remain open for discussions or collaboration regarding explainability of machine learning systems.

Regards,

Mikaël