

Enterprise Cloud Coalition

Comments in Response to the National Institute of Standards and Technology’s Artificial Intelligence Risk Management Framework Request for Information

As policymakers at home and abroad race to advance trust in artificial intelligence (AI), the [Enterprise Cloud Coalition](#) (ECC) applauds NIST’s continued work on AI and is pleased to respond to the AI Risk Management Framework (RMF) Request for Information (RFI)

The ECC is comprised of enterprise-focused, cloud-based U.S. companies with business models that process data on behalf of other companies and do not monetize user data for advertising.

The ECC, on behalf of member companies Akamai, Dropbox, Okta, Twilio, Workday, and Zendesk, works to educate policymakers about cloud computing, including the underlying technology and how it both promotes innovation and benefits enterprises and their customers.

Our successful business models depend on offering cutting-edge technology solutions that incorporate important privacy and cybersecurity considerations. This makes us uniquely positioned to comment on the ethical and consumer protection elements of new technologies such as artificial intelligence.

As AI technologies continue to develop, we hope to ensure that regulations, frameworks, standards, and best practices support AI’s growth, distinguish the different roles companies play in the AI ecosystem, and consider how AI is applied in the enterprise context. Additionally, the ECC believes that industry has a responsibility to ensure that all intelligent systems be built in an ethical way that respects privacy and mitigate bias.

Given that AI tools and technologies rely on data, strong privacy protections are essential to AI innovation. Consumers need to be sure their data will be used in a manner that matches their expectations, and ECC members look forward to engaging in public-private collaboration on setting appropriate AI standards.

The ECC applauds NIST for its efforts to date on the preliminary AI RMF. We appreciate the hard work that the NIST team has put into this process and appreciate the team’s recognition of the importance of a collaborative, transparent process (as NIST utilized in developing the cybersecurity and privacy frameworks). That process ensures inclusivity across sectors and business models – particularly for an AI ecosystem that is fully inclusive to business-to-business companies operating in the cloud. By utilizing a consensus-driven approach resulting in common definitions, plain language, and being adaptable across sectors, applications, and lifecycle phases, NIST is forging a path for inclusivity.

U.S. leadership in AI governance requires an approach that enables companies to identify, communicate, and address AI-related risks, while allowing customers and consumers alike to harness the profound economic benefits offered by these technologies. The ECC applauds NIST’s efforts to advance an AI RMF, which will serve as a noteworthy U.S. contribution to global discussions on AI policy. Indeed, as the U.S.’s largest trading partners—particularly in the European Union—move forward with AI regulation, timeliness is essential.

The ECC appreciates the opportunity to respond to this RFI and, again, applauds the work NIST has put into AI so far.