22 May 2023

Senator Richard Blumenthal, Chair
Subcommittee on Privacy, Technology, and the Law
U.S. Senate Committee on the Judiciary
224 Dirksen Senate Office Building
Washington, DC 20510

Re: Oversight of A.I.: Rules for Artificial Intelligence hearing

Dear Chairman Blumenthal,

Thank you for conducting the Privacy, Technology, and the Law Subcommittee's May 16th hearing on Oversight of A.I.: Rules for Artificial Intelligence. IEEE submits the following comments for the hearing record.

IEEE, the world's largest technical professional organization and a global standards developer, has a robust body of work with practical outputs in the field of AI and AI Systems (AIS) that are available to those looking to regulate the impact of AI on our society. IEEE is committed to developing trust in technologies through transparency, technical community building, and partnership across regions and nations. Measures that ensure that AI is developed and deployed with appropriate ethical consideration for human and societal values will enhance trust in these technologies, which in turn will increase the ability of the technologies to achieve much broader beneficial societal impacts.

IEEE supports the development of AI in ways that address issues of systemic risk, diminishing trust, and privacy challenges. To that end, IEEE has produced both technical standards, training, and certification programs that play a crucial role in the oversight of AI and help to ensure that AI technologies are developed, deployed, and used in a responsible and trustworthy manner. Further, IEEE's work complements public policies and regulations as they help provide implementation guidance, flexibility, and adaptability for various use cases across industries, consistency as they provide common frameworks, and global alignment enabling easier market access and reducing the need for multiple compliance processes.

When addressing AI oversight or governance in a time of rapid advances in and deployment of AI, developers and operators of AI systems must be aware of consensus-based global best technical practices, standards, and conformity assessment and certification schemes that recognize and align with end-users' and citizens' values when building and deploying AIS.

Specific to certification in the context of the ethical and social considerations raised by AI technology and its use, certification can incorporate ethical guidelines and conformance requirements that promote fairness, transparency, privacy, and accountability. By encouraging ethical AI practices–through certification, the U.S. government can foster the development of AI systems that align with societal values and respect fundamental rights.

To help organizations demonstrate that they are addressing the ethical and social considerations needed to build trust in their AIS, IEEE created the CertifAIEd(™) certification program for assessing ethics of AI Systems. The resulting certificate and mark demonstrates an organization's effort to deliver a solution with a more trustworthy AIS experience to their users. IEEE CertifAIEd currently applies four ethical criteria to an organization's AIS - transparency, accountability, algorithm bias, and privacy - with plans to also include procurement and rights governance criteria.

In addition to the certification program, IEEE's standard for Addressing Ethical Concerns during System Design (IEEE 7000(™)) provides a set of processes by which organizations can include in their consideration of ethical values throughout the stages of concept exploration and development.

As Congress continues to address the rules of AI, IEEE welcomes opportunities to contribute and assist. If you have any questions, please do not hesitate to contact Erica Wissolik at (202) 530-8347 or e.wissolik@ieee.org.

Sincerely,

Ed Palacio, President
IEEE-USA

IEEE-USA is the American component of the global IEEE (Institute of Electrical and Electronics Engineers), the world's largest technical professional society. We represent technology professionals in all parts of our 21st century– from space exploration to biotech, blockchain to power generation. IEEE has more than 150,000 individual members across the United States.

The IEEE Standards Association (IEEE SA) is one of the world's largest global standard setting bodies with a catalog of more than 2100 standards and projects, including many at the heart of our modern economy.