Business Roundtable

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July 17, 2023

The Honorable John Hickenlooper
Chairman
U.S. Senate Committee on Commerce,
Science & Transportation
Subcommittee on Consumer Protection,
Product Safety, and Data Security

The Honorable Marsha Blackburn
Ranking Member
U.S. Senate Committee on Commerce,
Science & Transportation
Subcommittee on Consumer Protection,
Product Safety, and Data Security

Dear Chairman Hickenlooper and Ranking Member Blackburn,

We appreciated the opportunity to meet with your staff to brief them on how Business Roundtable member companies are utilizing the National Institute of Standards and Technology (NIST)'s Artificial Intelligence (AI) Risk Management Framework (RMF) as they develop and deploy trustworthy and responsible artificial intelligence.

As discussed during the meeting, we have attached two foundational documents published through Business Roundtable's Responsible AI (RAI) Initiative in January 2022 that focus on improved trust and safety practices for responsible AI and policy initiatives:

- **Roadmap for Responsible AI (Roadmap)**, which outlines ten principles to guide businesses as they implement Responsible AI and reflects the perspectives and real-world experiences of companies from every sector of the economy that include AI developers and deployers.
- **Policy Recommendations**, which encourages federal approaches to AI practices, rules and guidelines that build public trust in AI while enabling innovation and promoting continued U.S. leadership.

The core values of the NIST AI RMF — voluntary, risk-based and rights-preserving — are closely aligned with the principles set forth in the Roadmap. There are several important areas of overlap between the principles and attributes of good AI governance set out in Business Roundtable's RAI Initiative and the NIST AI RMF:

- AI risk management is a shared responsibility between the public and private sectors and should be a multistakeholder approach, including all parts of an organization, affected communities and consumers.
- AI trustworthiness and good governance supports innovation and the broader distribution of AI technology's benefits.

- Organizations and government should take a comprehensive approach to AI risk management, including both potential beneficial and negative impacts in both absolute terms and relative to existing alternatives.
- AI risk management and governance approaches should align with regulatory and other risk management frameworks where possible.
- Effective risk mitigation requires a culture of accountable technology governance throughout the AI lifecycle by design, development and deployment teams representing a diversity of professional experience, subject matter expertise and lived experience.

Business Roundtable companies are at the forefront of putting the RMF principles and processes into practice. Many companies are embedding responsible AI principles into their internal governance structures, and some businesses are helping their clients to achieve AI systems that align with the principles laid out in the Roadmap. We have also attached a case study report we released in January 2023 to highlight how ten Business Roundtable member companies are integrating responsible AI practices into AI-powered projects, products and services to solve challenges and create benefits for businesses, consumers and society.

The RMF is a strong example of a successful, collaborative process that included a diverse range of stakeholders from research institutions, AI developers and users, and the broader technology industry. The resulting work provides AI developers and users with a risk-based guide to incorporating transparency and accountability throughout the entire AI lifecycle. Importantly, the RMF is an evolving document, and future iterations can account for the best and most timely guidance on implementing accountability efforts as AI technology advances. It is important that other frameworks and guidance developed by the U.S. government are consistent with the RMF to avoid uncertainty and fragmentation across the federal approach to AI.

Business Roundtable looks forward to continuing to work with you and your staff to promote and improve the effectiveness of the NIST AI RMF. We appreciate the shared principles of innovation, trustworthiness, transparency, privacy, safety, security, inclusion and respect for the community.

Sincerely,

Kristen Silverberg
President & Chief Operating Officer
Business Roundtable

Attachments:
Business Roundtable Roadmap for Responsible AI
Business Roundtable Policy Recommendations for Responsible Artificial Intelligence
AI Innovation at Work: Putting Principles into Practice