



June 27, 2023

The Honorable John Hickenlooper  
Chairman  
Subcommittee on Consumer  
Protection, Product Safety &  
Data Security  
United States Senate  
Washington, DC 20510

The Honorable Marsha Blackburn  
Ranking Member  
Subcommittee on Consumer  
Protection, Product Safety  
& Data Security  
United States Senate  
Washington, DC 20510

Dear Chairs Hickenlooper and Ranking Member Blackburn:

Thank you for your recent correspondence regarding efforts among the business community to advance the development of trustworthy Artificial Intelligence ("AI") and implement the recently released National Institutes Standards and Technologies Artificial Intelligence Risk Management Framework ("NIST AI RMF").

### **The Importance of AI to Business**

The U.S. Chamber of Commerce ("Chamber") has a long track record of leading on AI policy development. In 2019, the Chamber's Technology Engagement Center released AI principles<sup>1</sup> and established an Artificial Intelligence Working Group ("AI Working Group") in 2019 that has grown to over 160 member companies and associations from all industry sectors. The AI Working Group focuses on educating Chamber membership, the public and policymakers on the benefits of AI, specific use cases and advocating for common-sense policies to advance the adoption of trustworthy AI applications.

Furthermore, in 2022 the Chamber established a bipartisan Commission on Artificial Intelligence Competitiveness, Inclusion, and Innovation ("the Chamber Commission") led by former Congressmen John Delaney and Mike Ferguson. The Chamber took this action as a means to explore thoughtful and constructive policy solutions for game changing AI technologies. In March 2023, the Chamber Commission released policy recommendations in the areas of regulation, global competitiveness, workforce and national security.<sup>2</sup>

AI is revolutionary for businesses of all sizes and industries. For example, AI is enabling doctors to more quickly diagnose cancer, securing cyber networks, and assisting in disaster response. According to a McKinsey study, AI is projected to generate an additional \$13 trillion to the global GDP by 2030. Other estimates put that number at a higher amount. Given the benefits and concerns about the potential harms of AI, it is imperative for the Federal Government to take the lead role in developing guardrails to allow for innovation and to develop a public-private partnership for standards in the development and deployment of trustworthy AI. In addition to our principles and Commission report, the Chamber, over the last five years, has led in promoting the

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<sup>1</sup> <https://www.uschamber.com/technology/us-chamber-releases-artificial-intelligence-principles>

<sup>2</sup> [https://www.uschamber.com/assets/documents/CTEC\\_AICommission2023\\_Report\\_v6.pdf](https://www.uschamber.com/assets/documents/CTEC_AICommission2023_Report_v6.pdf)

responsibility of the business community to develop and deploy trustworthy AI in the pursuit of the necessary resources for research and standards,<sup>3</sup> and a proposed regulatory framework.<sup>4</sup>

### **The Chamber's Support for a Voluntary Framework**

As you are aware, the NIST AI RMF was released in January 2023. The open and iterative process established by NIST, and the Framework represents a promising collaborative risk management model. The Chamber was honored to be invited by the Department of Commerce to provide remarks at the launch event for the Framework and attest to how a voluntary framework can assist in incorporating trustworthiness in designing, developing, using, and evaluating AI products, services, and systems. At the event, the Chamber committed to educating its local and state chamber network and small businesses about integrating the Framework into business operations.

The business community understands the importance of establishing a voluntary Risk Management Framework and how that can assist in developing an innovative environment for AI. For a technology like AI to be deployed successfully, stakeholders must rely on new innovations and the frameworks that guide them. Such frameworks are not a new concept. For example, the NIST Cybersecurity Framework is seen as the gold standard for data protection in the United States.

The Chamber's involvement with the creation of the NIST AI RMF started long before its release. The Chamber first advocated for creating an AI Risk Management Framework in 2020.<sup>5</sup> The Chamber further supported the National Artificial Intelligence Initiative Act,<sup>6</sup> which congressionally mandated the development of the NIST AI RMF.

Once the National AI Initiative Act was signed into law as a part of the Mac Thornberry National Defense Authorization Act of 2021, the Chamber quickly turned its attention to ensuring that AI RMF was provided the necessary input to be developed in a manner in which all stakeholders within the AI ecosystem can robustly utilize. Through NIST's evolutionary process, the Chamber provided substantive and thoughtful feedback to NIST on its development. This work included responses to NIST's four separate requests for comments<sup>7</sup>:

- AI Risk Management Framework Request for Information (Sept 15, 2021)<sup>8</sup>
- AI Risk Management Framework Concept Paper (Jan 25, 2022)
- AI Risk Management Framework 1st Draft (April 29, 2022)<sup>9</sup>
- AI Risk Management Framework 2nd Draft (Sept 29, 2022)<sup>10</sup>

### **Putting the Framework Into Action**

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<sup>3</sup> <https://docs.house.gov/meetings/SY/SY15/20220929/115165/HMTG-117-SY15-Wstate-CrenshawJ-20220929.pdf>

<sup>4</sup> [https://www.uschamber.com/assets/documents/CTEC\\_AICommission2023\\_Report\\_v6.pdf](https://www.uschamber.com/assets/documents/CTEC_AICommission2023_Report_v6.pdf)

<sup>5</sup> <https://americaninnovators.com/advocacy/multi-association-request-for-a-nist-ai-framework/>

<sup>6</sup> <https://americaninnovators.com/wp-content/uploads/2020/09/09082020fy21ndaletterstocongress.pdf>

<sup>7</sup> NIST cited the Chamber multiple times in its "Summary Analysis of Response to the NIST AI RMF Request for Information *available at*

[https://www.nist.gov/system/files/documents/2021/10/15/AI%20RMF\\_RFI%20Summary%20Report.pdf](https://www.nist.gov/system/files/documents/2021/10/15/AI%20RMF_RFI%20Summary%20Report.pdf)

<sup>8</sup> [https://americaninnovators.com/advocacy/c\\_tec-comments-on-nist-ai-risk-management-framework/](https://americaninnovators.com/advocacy/c_tec-comments-on-nist-ai-risk-management-framework/)

<sup>9</sup> <https://americaninnovators.com/advocacy/comments-to-nist-on-the-ai-risk-management-framework-draft/>

<sup>10</sup> <https://americaninnovators.com/advocacy/comment-letter-to-nist-on-ai-risk-management-framework-second-draft-and-playbook/>

Since the official release of the NIST AI RMF 1.0 In January of this year, the Chamber has partnered with NIST on multiple occasions to highlight the Framework in helping facilitate the development of responsible and trustworthy Artificial Intelligence. This includes recently hosting NIST at the Chamber to discuss the AI RMF with digital attaches from European countries. The Chamber has also educated its local and state chamber partners about the Framework and Its benefits for establishing trustworthy AI.

The NIST Risk Management Framework also played a vital role in the recent Chamber Commission report, which states, "[f]or lower-risk uses of AI, soft law options such as adherence to industry standards and best practices, like NIST's AI RMF, should supplement rules and standards."<sup>11</sup> Because of how vital the NIST AI RMF was in the recommendation that Commission put forth, the Chamber Commission asked NIST to provide opening remarks when the Chamber's Commission recommendations were released.

NIST's voluntary Risk Management Framework should be Incorporated by the C-Suite of major companies and small businesses, in particular for low-risk uses of AI. Such an approach balances the need for innovation and enables small businesses to compete and innovate through a flexible regulatory environment. For this reason, we have continued to offer our assistance to NIST In reaching C-suite executives, small businesses and highlighting the Importance of the NIST AI RMF to the overall business community.

As the business community continues to lead in the development of other portions of the Framework and look forward to working with all stakeholders to help in the development of upcoming "profiles," the NIST RMF's use-case implementations of the Framework's functions, associated with it, we would welcome an opportunity to bring members of the business community In to meet with you and your staff to discuss how they are Implementing the Framework, and working to addressing any developing AI responsibly and ethically.

Thank you for your leadership on these Issues and we look forward to working with you in the development of laws and policies necessary for the development and deployment of AI and the ensure American leadership in the field.

Sincerely,

A handwritten signature in black ink, appearing to read 'T. Quaadman', with a long, sweeping underline.

Tom Quaadman  
Executive Vice President  
Chamber Technology Engagement Center  
U.S. Chamber of Commerce

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<sup>11</sup> [https://www.uschamber.com/assets/documents/CTEC\\_AICommission2023\\_Report\\_v6.pdf](https://www.uschamber.com/assets/documents/CTEC_AICommission2023_Report_v6.pdf)