



June 29, 2023

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Re: Request for Information, Office of Science and Technology Policy; Automated Worker Surveillance and Management (88 Fed. Reg. 27,932-27,936)

The U.S. Chamber of Commerce's Technology Engagement Center ("C_TEC") appreciates the opportunity to submit feedback to the Office of Science and Technology Policy (OSTP) in response to its request for information ("RFI") on "Automated Worker Surveillance and Management." The Chamber would like to reiterate our concerns regarding the inadequate time OSTP provided commenters to compile an extensive review of the prevalence, uses, purposes, and deployment of automated worker surveillance and management systems.

We and other organizations requested¹ on May 24th a 60-day extension to the comment period. While the OSTP's 14-day extension of the comments was published in the Federal Register on June 20th, this brief extension does not provide parties with the necessary time to conduct a thorough review of this RFI and its attendant issues.

The Chamber recognizes that technology brings significant opportunities to the workplace by providing employees and employers with a powerful tool that enhances their organizations' productivity, efficiency, and security. Automated workplace management can enable many benefits, such as:

- Preventing Workplace Violence and Enhancing Safety and Security: AI-based workplace management tools, such as video analytics, work zone intrusion detection, panic buttons, and AI monitoring for abnormalities, enable employers to protect employees from harm and improve emergency response proactively. AI-based management tools can enhance workplace safety by deterring potential criminal activity, including workplace violence² and theft, and by identifying breaches and safety hazards. These efforts can help employees feel more secure and protected in their work environment.

¹ <https://www.regulations.gov/>

² According to the U.S. Bureau of Labor Statistics, there were 392 homicides and 37,060 nonfatal injuries in the workplace resulting from an intentional injury by another person. See, [Workplace violence: homicides and nonfatal intentional injuries by another person in 2020 : The Economics Daily: U.S. Bureau of Labor Statistics \(bls.gov\)](#)

- Accident and Illness Prevention: Many employers have recognized the benefits of AI and automated technologies to reduce risk and identify hazards to eliminate workplace fatalities and injuries. In real-time, smart sensors and wearable devices can help detect potential accidents, ergonomic risks, toxic or combustible liquids or gases, or other hazards. Heat stress monitors using AI to monitor worker data—such as humidity, temperature, and increases in pulse—can reduce risks in high heat or outdoor environments to reduce the risk of heat illnesses. AI-enabled robots can conduct inspections in hazardous environments—such as nuclear power plants, mines, and oil rigs—or spaces with a narrow or confined space profile. This allows for prompt intervention and prevention of workplace injuries, ensuring the well-being of employees.
- Performance Feedback and Training: Workplace management, equipped with analytics, can provide objective insights into performance, allowing supervisors to identify areas for improvement and provide targeted coaching, training, and other support. This feedback can enhance professional development, improve employee performance and satisfaction, and help employees achieve their career goals. Workplace management tools can be essential in mitigating potential bias by increasing objectivity.

While there are clear benefits, we understand there are legitimate concerns surrounding the use of the technology. For this reason, employers have been careful to adopt new automated workforce technologies only after a rigorous assessment of the benefits and risks of implementing such tools. Furthermore, employers aim to be transparent about how they use new technologies, establish principles to guide them, and follow existing legal protections for privacy and anti-discrimination. They recognize that engaging in an inclusive dialogue about using new technologies is critical to fostering a culture of trust with employees.

The Chamber, in partnership with Deloitte, surveyed senior-level AI researchers, developers, and company decision-makers and released a report titled “Investing in trustworthy AI,”³ highlighting ways in which the “benefits of AI applications to workers and consumers can increase trust in AI.” Respondents to the survey indicated that workers could become more confident in using and working alongside AI as they saw it improve their day-to-day work experience, safety, and professional opportunities.

The report further highlights, “Building broad confidence and support for AI technologies requires the effective articulation and demonstration of the benefits that consumers, workers, and the public might see from AI-enabled changes to their day-to-day life and work.”⁴ While AI unlocks a wide range of benefits, the report cites specific cases of the

³ <https://www2.deloitte.com/content/dam/Deloitte/us/Documents/technology/us-ai-institute-investing-in-trustworthy-ai-full-report-new.pdf>

⁴ <https://www2.deloitte.com/content/dam/Deloitte/us/Documents/technology/us-ai-institute-investing-in-trustworthy-ai-full-report-new.pdf>

economic and social benefits of AI for the workforce. For this reason, we will also submit the report along with this response.

The Chamber remains committed to fostering an environment where innovation and productivity thrive while upholding the well-being of workers. We thank you again for the opportunity to participate in this critical discussion.

Sincerely,

Michael Richards

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