July 7, 2023

Nik Marda
Chief of Staff, Tech Division
Office of Science and Technology Policy
Executive Office of the President
Eisenhower Executive Office Building
1650 Pennsylvania Avenue NW
Washington, DC 20504

RE: Office of Science and Technology Policy Request for Information on National Priorities for Artificial Intelligence [Docket No. OSTP-TECH-2023-0007]

Dear Mr. Marda:

The Alliance for Automotive Innovation ("Auto Innovators") is pleased to submit comments to the Office of Science and Technology Policy ("OSTP") in response to its request for information on the development of a National Artificial Intelligence Strategy. Auto Innovators appreciates OSTP's engagement with various stakeholders regarding a path for the United States to leverage the benefits of artificial intelligence, mitigate any potential risks, and inform national priorities and future actions.

Auto Innovators represents the manufacturers that produce most of the cars and light trucks sold in the U.S., original equipment suppliers, battery makers, technology companies, and other value-chain partners within the automotive ecosystem. Representing approximately 5 percent of the country's GDP, responsible for supporting 10 million jobs, and driving $1 trillion in annual economic activity, the automotive industry is the nation's largest manufacturing sector.

Artificial intelligence plays a key role in personal mobility innovation and the transition to a cleaner, safer, and smarter transportation future. The automotive industry leverages the power of artificial intelligence to integrate driver support features, advanced safety technologies, and automated driving systems into consumer vehicles. These and other technological advances have the potential to protect vulnerable road users, reduce serious injuries and deaths, improve roadway safety, provide environmental benefits, and advance transportation equity. For these reasons, Auto Innovators shares the Administration's interest in, and commitment to, crafting a National Artificial Intelligence Strategy that responsibly advances the development and use of artificial intelligence and related technologies.

Auto Innovators makes the following recommendations to OSTP as it helps to develop the National Artificial Intelligence Strategy:

- **Expand Outreach to Stakeholders:** Auto Innovators appreciates that OSTP issued the request for information to obtain feedback from broad communities of interest and to hear the perspectives of a wide range of stakeholders. We urge OSTP to supplement the request for information with listening sessions and other input opportunities that would engage a cross-section of artificial intelligence actors across a broad set of disciplines.

- **Coordinate Potential Regulation:** In addition to providing a "whole-of-society" approach to artificial intelligence, the National Artificial Intelligence Strategy should also advance a "whole-of-government" approach. The Strategy should encourage interagency coordination to minimize duplication or conflict with respect to existing regulatory requirements whenever possible. For heavily-regulated industries such as the automotive industry, the Strategy should account for existing regulatory oversight of artificial intelligence systems.

- **Balance Risks and Benefits:** The request for information – correctly – seeks information on both the benefits and risks associated with artificial intelligence and related technologies. It is critical that the public and private sectors work together to determine the appropriate balance between enabling the benefits of artificial intelligence technologies for promising use cases and managing or reducing the risks posed by such technologies. Rather than requiring artificial intelligence technologies to pose zero risk – an impossible task – seeking a balance will ensure that important and potentially lifesaving artificial intelligence-enabled applications can prevail.

- **Reiterate Context:** Much of the current policymaking debate pertaining to artificial intelligence focuses on the challenges and opportunities associated with generative artificial intelligence and large language models, almost to the exclusion of discussion regarding other applications and use cases. It is important that the National Artificial Intelligence Strategy accounts for various developments in artificial intelligence technologies to ensure a reasonable and cohesive approach to harnessing benefits and managing risks. As the National Institute of Standards and Technology notes in the Artificial Intelligence Risk Management Framework, "Risk tolerance and the level of risk that is acceptable to organizations or society are highly contextual and application and use-case specific." Moving forward, context should be regularly assessed to help policymakers and artificial intelligence actors understand and prioritize potential benefits and risks.

- **Prioritize High-Risk Use Cases:** Artificial intelligence technologies are currently being used or will be used in a variety of contexts and a diversity of applications. Some of these use cases pose more significant risks for harmful societal outcomes than others. In developing the National Artificial Intelligence Strategy, OSTP should focus any calls for regulation or legislation on high-risk uses of artificial intelligence technologies that are more likely to lead to harmful societal outcomes over those that are unlikely to lead to such outcomes. Such an approach could prioritize applications or use cases that have significant legal impact or implication, such as those related to employment, education, housing, or health care.

- **Exercise Caution with Import and Export Controls:** The automotive industry is using artificial intelligence to improve motor vehicle safety and reduce traffic fatalities and injuries. The potential imposition of additional controls on artificial intelligence technologies and inputs should exclude these automotive use cases, including automated and autonomous vehicle technology, except to the extent necessary to address a specific national security concern. Any controls should reflect and accommodate the civil, commercial nature of automotive use cases and avoid impeding the research and development activities of the automotive industry. Such constraints could place the industry at a globally competitive disadvantage.

Auto Innovators welcomes the opportunity to submit these comments to OSTP as it develops the National Artificial Intelligence Strategy. We look forward to continued engagement with OSTP as it seeks to build on actions that the Federal Government continues to take to chart a path that maximizes the opportunities for artificial intelligence technologies to improve the lives of the American people and solve tough global challenges.

Sincerely,

Tara Hairston

Tara Hairston
Senior Director, Technology, Innovation, & Mobility Policy