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U.S. Department of Commerce  
National Institute of Standards and Technology  
100 Bureau Drive  
Gaithersburg, MD 20899

**Subject: “A Proposal for Identifying and Managing Bias within Artificial Intelligence,”  
Draft NIST Special Publication 1270**

Dear Acting Director Olthoff:

On behalf of International Business Machines Corporation (IBM), we welcome the opportunity to comment on the National Institute of Standards and Technology’s (NIST) recent draft report on “A Proposal for Identifying and Managing Bias within Artificial Intelligence” (hereafter, “draft report”).

At IBM, we recognize that with great innovative power comes even greater responsibility. That is why we recently pointed to explicit steps that should be part of any mandatory requirements for companies addressing issues related to AI bias. These include conducting impact assessments prior to the deployment of a high-risk AI system, transparent documentation and auditability of those assessment processes, and supporting developer training around bias to better equip the workforce with the tools necessary to recognize how bias may be introduced within the AI development pipeline.<sup>1</sup>

IBM supports NIST’s goal of using this draft report “to advance methods to understand and reduce harmful forms of AI bias ... in the pursuit of a framework for trustworthy and responsible AI.” To that end, we would draw NIST’s attention to BSA | The Software Alliance’s (BSA) framework on AI bias, which proposes similar approaches based on a whole-of-lifecycle approach to addressing bias concerns.<sup>2</sup> To the extent this draft report is intended to fold into the existing work NIST is undertaking in pursuit of an AI Risk Management Framework, we would also draw the agency’s attention to separate comments IBM has filed in response to the *Artificial Intelligence Risk Management Framework, Docket #210726-0151*.

We thank you for your efforts in drafting this report and look forward to both your consideration of these comments and future opportunities to contribute to the work ahead.

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<sup>1</sup> See Dr. Stacy Hobson and Anjelica Dortch, “Mitigating Bias in Artificial Intelligence,” IBM Policy Lab, 26 May 2021, available at <https://www.ibm.com/policy/mitigating-ai-bias/>.

<sup>2</sup> See “Confronting Bias: BSA’s Framework to Build Trust in AI,” available at <https://ai.bsa.org/wp-content/uploads/2021/06/2021bsaibias.pdf>.

Respectfully,

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