

U.S. Chamber of Commerce

1615 H Street, NW Washington, DC 20062-2000 uschamber.com

December 7, 2023

The Honorable James Comer Chair Committee on Oversight and Accountability U.S House of Representatives Washington, DC 20515

The Honorable Nancy Mace Chair Subcommittee on Cybersecurity, Information Technology, and Government Innovation U.S. House of Representatives Washington, DC 20515 The Honorable Jamie Raskin Ranking Member Committee on Oversight and Accountability U.S. House of Representatives Washington, DC 20515

The Honorable Gerald Connolly Ranking Member Subcommittee on Cybersecurity, Information Technology, and and Government Innovation U.S. House of Representatives Washington, DC 20515

Dear Chairs Comer and Mace and Ranking Members Raskin and Connolly:

Thank you for holding the hearing, "White House Policy on Al." The COVID-19 pandemic highlighted the need for the federal government to modernize its information technology systems. Decades old computer programs that are obsolete, or systems that are unable to interact with each other makes it more difficult for citizens to interact with government bureaucracy and for programs to be more costly and inefficient.

Artificial intelligence ("AI") can be used to modernize government information technology systems and even help to identify and root out waste, fraud, and abuse-- reducing costs and making government more efficient and interactive. While a risk-based approach to filling gaps in service is needed to allow for updated existing laws and regulations to address potential harms, outmoded policies that prevent appropriate government adoption of AI must be addressed. None of this will be possible unless the United States remains the global leader in emerging technologies and if Congress and the Administration put forth balanced policies that identify and address issues while providing the flexibility to deal with future consequences.

The Chamber believes that it is vital for the government to develop rules and regulations that do not create unnecessary barriers for appropriate adoption of AI. This is why the Chamber and other trade associations sent a letter to the Office Management and Budget (OMB) on November 14th, outlining our concerns with a short timeline for stakeholder feedback on the OMB AI Guidance. The draft guidance solicits detailed feedback on five wide-ranging critical areas, and asks for input on scope, AI governance, reporting requirements, responsible innovation, managing risk, and definitions. Many of these issues overlap and create interconnected consequences that commenters must assess on a micro and macro level. However, the condensed timelines and quantity of proposals make it impossible for stakeholders to do so.

Accordingly, we request that Congress exert its oversight to ensure that stakeholders have the time to provide comprehensive feedback to ensure such efforts would lead to impeding the adoption of Artificial Intelligence by the government. The Committee in particular has an important role in exercising oversight over these critical issues and we thank you for your work in this area. The complexity of these issues makes it necessary for thoughtful comments to inform policies aimed at maximizing the utilization of AI within the federal government while ensuring the trustworthiness of these technologies.

Sincerely,

Tom Quaadman

Executive Vice President

Chamber Technology Engagement Center

U.S. Chamber of Commerce