

RE: Comments of ACT | The App Association to the OECD's public consultation on AI risk thresholds

ACT | The App Association (App Association) appreciates the opportunity to submit views to the Organisation for Economic Co-operation and Development (OECD) in response to its call for views on artificial intelligence (AI) risk thresholds. We generally support and share the goal of supporting responsible and pro-innovation governance of advanced AI systems across their lifecycle.

The App Association is a trade association representing small business technology companies located around the world, both within and outside of OECD member countries. For more information, please visit www.actonline.org.

In addressing risk thresholds for advanced AI systems, we urge the OECD to align with the following:

- The App Association's AI Policy Principles: <https://actonline.org/wp-content/uploads/2023-11-16-ACT-AI-Policy-Principles-FINAL.pdf>
- The App Association's 'AI Roles and Interdependencies Framework', which proposes clear definitions of stakeholders across the healthcare AI value chain, from development to distribution, deployment, and end use; and discusses roles for supporting safety, ethical use, and fairness for each of these important stakeholder groups that are intended to illuminate the interdependencies between these actors, thus advancing the shared responsibility concept: <https://actonline.org/wp-content/uploads/ACT-AI-Roles-Interdependencies-Framework-final-text-May-2024-UK-English.pdf>

Sincerely,

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