

25 September 2026

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**RE: Request of the Association for Competitive Technology to Participate in the
National Working Group on Artificial Intelligence (Circular No. 14-13/2026-
C&B/TEC/NWG-AI, dated 23 June 2026)**

Dear Shri Devendra Singh and Ms Jyoti Roat,

The Association for Competitive Technology (ACT) respectfully requests the opportunity to participate in the Telecommunication Engineering Centre's (TEC) National Working Group (NWG) on Artificial Intelligence (AI). We appreciate TEC's effort to bring together representatives and experts from industry, academia, research organisations, startups, government organisations, and other relevant stakeholders to coordinate AI-related standardisation activities and strengthen India's participation in international AI standardisation efforts.¹

¹ Telecommunication Engineering Centre, Department of Telecommunications, Ministry of Communications, Government of India, Circular No. 14-13/2026-C&B/TEC/NWG-AI, *Inviting nominations for the constitution of National Working Group (NWG) on Artificial Intelligence (AI) under TEC* (23 June 2026).

We recognise that TEC's Circular requested nominations by 7 July 2026. Given the ongoing nature of the NWG's work and its objective of serving as a common platform for stakeholder coordination, we respectfully request that TEC consider ACT's nomination notwithstanding that date. ACT would like to nominate **Brian Scarpelli, Senior Global Policy Counsel, Association for Competitive Technology**, to participate in the NWG.

ACT is a not-for-profit global policy trade association for the small business technology developer community. Our members are entrepreneurs, innovators, and independent developers who build products and services across every industry, including in India, and who create and deploy AI technologies in both consumer and enterprise settings. We work with our members and policymakers to promote a policy environment that rewards and inspires innovation while providing resources that help developers raise capital, create jobs, and continue to build technology.²

The small businesses and startups we represent take part in international standards development (and many more would like to) because they leverage the efficiency of technical standards to build their products, including in the context of AI. Smaller firms nonetheless remain underrepresented in AI policy and standardisation processes and face practical barriers to meaningful participation, among them cost and the staff time these processes demand. Standards bodies and governments should work to lower those barriers so that the resulting standards reflect the full range of firms that implement and are impacted by them.

TEC's stated objectives for the NWG align closely with ACT's work. The Circular provides that the NWG will identify and monitor AI-related Questions, Work Items, and standardisation activities across the Study Groups of the ITU Telecommunication Standardization Sector (ITU-T), strengthen India's participation and contributions to international AI standardisation efforts within the ITU-T while safeguarding national interests, and promote coordination and consensus-building among stakeholders engaged in AI standardisation activities. AI-related standardisation is already developing across a range of ITU-T activities, including work on the use of AI and machine learning in future networks in Study Group 13, on AI security in Question 16/17 of Study Group 17, and on AI-enabled multimedia and content delivery systems in Study Group 21, each of which ACT

² Association for Competitive Technology, *Perspectives of the Association for Competitive Technology on the Mandate of India's AI Governance and Economic Group* (16 July 2026).

would follow and contribute to.³ Ensuring that the practical experience of smaller technology developers and downstream implementers informs these discussions is vital to achieving India's AI leadership goals.

Where India's guidance maps cleanly to recognised international standards and references such as ISO/IEC 42001 and the NIST AI Risk Management Framework (AI RMF), a small business can build once and serve customers worldwide. Continued support for private-sector and multistakeholder standards development serves the same end, as does resisting the temptation to convert voluntary standards wholesale into rigid regulatory checklists that may become outdated as the technology evolves.

ACT would also bring to the NWG its experience examining the shared roles and responsibilities of different participants across the AI ecosystem. ACT's **AI Roles & Interdependency Framework** maps the common roles in the AI value chain and sets out practical safety, transparency, and explainability actions for each actor, calibrated to what that actor knows, what it does, and what it can realistically do to mitigate known harms.⁴ Underlying it is ACT's broader view that obligations and risk-management expectations belong with the actors best positioned, by knowledge and by capability, to mitigate a known or reasonably expected risk.

ACT has also been actively engaged in India's technology policy and standards ecosystem. In July 2026, ACT provided perspectives to India's AI Governance and Economic Group (AIGEG), supporting a measured and adaptive approach to AI governance and encouraging the Government of India to align with widely used international standards and references. In July 2025, ACT convened an industry workshop in New Delhi, with the Jindal Initiative on Research in IP and Competition at O.P. Jindal Global University and other stakeholders, on

³ International Telecommunication Union, *ITU-T Study Groups, Study Period 2025-2028*; ITU-T Study Group 13, *Future Networks and Emerging Network Technologies*; ITU-T Study Group 17, Question 16/17, *Artificial Intelligence (AI) Security*; ITU-T Study Group 21, *Technologies for Multimedia, Content Delivery and Cable Television — Activities Related to Artificial Intelligence*. ITU-T currently addresses AI across several technical areas, including future networks, security, and AI-enabled multimedia systems.

⁴ Association for Competitive Technology, *AI Roles & Interdependency Framework* (May 2024), <https://actonline.org/wp-content/uploads/2026/09/ACT-AI-Roles-Interdependencies-Framework-final-text-May-2024-UK-English.pdf>. The framework maps common roles in the AI value chain and practical actions calibrated to each actor's knowledge, role, and ability to mitigate harm, while mapping those responsibilities to the NIST AI RMF functions.

technical standards and the difficulties smaller technology companies face in bringing standardised products to market.⁵

Brian Scarpelli, ACT's senior global policy counsel, has represented the association in standards, AI, intellectual property, and emerging technology policy matters internationally from Brazil to the European Union to the United States, including in proceedings on the development of voluntary consensus standards and on the participation of small businesses in the standards ecosystems. Most recently, he led ACT's comments on the American National Standards Institute's draft 2025 United States Standards Strategy and he took part directly in ACT's standards engagement in New Delhi.⁶ His participation would let ACT bring the NWG the perspective of the smaller developers who build on AI technologies and technical standards in markets around the world.

ACT therefore respectfully requests that TEC accept the following nomination for participation in the National Working Group on Artificial Intelligence:

Name	Designation	Organisation	Email	Phone No.
Brian Scarpelli	Senior Global Policy Counsel	Association for Competitive Technology	bscarpelli@actonline.org	+1 517-507-1446

Mr Scarpelli would participate at ACT's own cost and in accordance with any terms of reference and working procedures TEC sets for the NWG. If the NWG's initial membership has already been constituted, we would be glad to be considered for any additional membership, for observer status, or for any other means by which ACT can contribute to the group's ongoing work, including written inputs on particular Questions or Work Items. Should TEC prefer that ACT be represented by a member based in India, we would be pleased to identify a suitable representative.

⁵ Association for Competitive Technology, *Industry Workshop: A Fair Standard-Essential Patent Licensing Process for a Thriving Indian Economy* (7 July 2025). ACT convened the workshop with the Jindal Initiative on Research in IP and Competition at O.P. Jindal Global University and other stakeholders at the India Habitat Centre in New Delhi; Brian Scarpelli participated on behalf of ACT.

⁶ Association for Competitive Technology, *Comments on ANSI Draft 2025 U.S. Standards Strategy* (14 July 2025). Brian Scarpelli served as a signatory to ACT's comments concerning standards development and the standards ecosystem.

We appreciate TEC's consideration of this request and stand ready to support its efforts to strengthen India's participation in international AI standardisation, so that the perspectives of startups and small technology developers are reflected in these discussions.

Sincerely,

Morgan Reed

President

Association for Competitive Technology