

March 15, 2024

Infocomm Media Development Authority
10 Pasir Panjang Road, #03-01
Mapletree Business City
Singapore 117438

AI Verify Foundation
10 Pasir Panjang Road, #03-01
Mapletree Business City
Singapore 117438

RE: Comments of ACT | The App Association to the Infocomm Media Development Authority of Singapore and the AI Verify Foundation on *Proposed Model AI Governance Framework for Generative AI: Fostering a Trusted Ecosystem*

ACT | The App Association (App Association) appreciates the opportunity to submit views to the Infocomm Media Development Authority of Singapore and the AI Verify Foundation on *Proposed Model AI Governance Framework for Generative AI: Fostering a Trusted Ecosystem*.¹

The App Association represents thousands of small business software application development companies and technology firms that create the technologies that drive internet of things (IoT) use cases across consumer and enterprise contexts, increasingly using artificial intelligence (AI). Today, the value of the ecosystem the App Association represents – which we call the app economy – is approximately SGD 2.27 trillion and is responsible for tens of thousands of Singaporean jobs, while serving as a key driver of the \$10.7 trillion internet of things (IoT) revolution. Alongside the world’s rapid embrace of mobile technology, our members create the innovative solutions that power IoT across modalities and segments of the economy. Singapore’s approach to generative AI governance directly impacts the small business technology community, and we appreciate the opportunity to provide views on the proposed model AI governance framework.

The App Association agrees that, with the right enabling environment, ecosystem of market actors, and investments, AI technologies can foster greater efficiency and accelerated development results across a variety of sectors and contexts, whether in agriculture, health, education, energy, etc. We also agree that addressing the risks presented by AI technologies is essential to fully harnessing their benefits across a range of geographic and cultural contexts is vital in responsibly developing and deploying AI.

AI-driven algorithmic decision tools and predictive analytics are having, and will continue to have, substantial direct and indirect effects on Singaporeans. Some forms of

¹ https://aiverifyfoundation.sg/downloads/Proposed_MGF_Gen_AI_2024.pdf.

AI are already being used to improve Singaporean consumers' lives today – for example, AI is used to detect financial and identity theft and to protect the communications networks upon which Singaporeans rely against cybersecurity threats, to enable countless Singaporeans with disabilities to achieve experiences in their lives far closer to the experiences of those without disabilities, etc. Moving forward, across use cases and sectors, AI has incredible potential to improve Singaporean consumers' lives through faster and better-informed decision making, enabled by cutting-edge distributed cloud computing. As an example, healthcare treatments and patient outcomes stand poised to improve disease prevention and conditions, as well as efficiently and effectively treat diseases through automated analysis of x-rays and other medical imaging. It is therefore vital that government frameworks preserve the ability to innovate and iterate across AI use cases.

Nonetheless, as the proposed framework also discusses, AI also has the potential to raise a variety of unique considerations for policymakers. The App Association appreciates the efforts to develop a policy approach to AI that will bring its benefits to all, balanced with necessary safeguards to protect consumers. To assist IMDA and the AI Verify Foundation, the App Association is sharing its comprehensive set of AI policy principles for consideration.² The App Association supports IMDA and the AI Verify Foundation's efforts to develop a flexible, risk-based, outcome-focused, and cost-effective AI governance model for generative AI, and strongly encourage IMDA and the AI Verify Foundation to align its model with the principles we have developed based on the consensus of our diverse and innovative membership.

The App Association appreciates IMDA and the AI Verify Foundation's consideration of the above views. AI offers immense potential for widespread societal benefit, which is why the model should responsibly foster investment and innovation in any way practicable. Our members both use and develop solutions that include AI, and those are in turn used by countless Singaporeans and others around the world. As society moves to adopt AI technologies on a greater scale, it is important that the small business developers who power the global app economy have their views considered and can contribute to this important trend.

We urge IMDA and the AI Verify Foundation to contact the undersigned with any questions or ways that we can assist moving forward.

² **Appendix A, ACT** | *The App Association's Policy Principles for Artificial Intelligence.*

Sincerely,

A handwritten signature in black ink, appearing to read 'B. Scarpelli', with a stylized flourish at the end.

Brian Scarpelli
Senior Global Policy Counsel

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