

March 1, 2024

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United States Agency for International Development
1300 Pennsylvania Avenue Northwest
Washington, District of Columbia 20004

RE: Comments of ACT | The App Association to the United States Agency for International Development on *AI in Global Development Playbook* (89 FR 5200)

ACT | The App Association (App Association) appreciates the opportunity to submit views to the United States Agency for International Development (USAID) on its efforts to develop the *AI in Global Development Playbook* incorporating the National Institute of Standards and Technology's (NIST's) AI Risk Management Framework's principles, guidelines, and best practices into the social, technical, economic, governance, human rights, and security conditions of contexts beyond United States borders.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. Today, the value of the ecosystem the App Association represents – which we call the app economy – is approximately \$1.7 trillion and is responsible for 5.9 million American jobs, while serving as a key driver of the \$8 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. NIST's planned voluntary artificial intelligence risk management framework (AI RMF)—and the efforts of numerous agencies with respect to AI policy and regulation—directly impacts the app economy. We support the goals set forth in Executive Order 14110 on Safe, Secure, and Trustworthy Development and Use of Artificial Intelligence, and USAID's and NIST's efforts to carry out their responsibilities set forth in it.

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.

¹ 89 FR 5200.

AI is an evolving constellation of technologies that enable computers to simulate elements of human thinking – learning and reasoning among them. An encompassing term, AI entails a range of approaches and technologies, such as Machine Learning (ML) and deep learning, where an algorithm based on the way neurons and synapses in the brain change due to exposure to new inputs, allowing independent or assisted decision making.

AI-driven algorithmic decision tools and predictive analytics are having, and will continue to have, substantial direct and indirect effects on Americans. Some forms of AI are already being used to improve American consumers' lives today – for example, AI is used to detect financial and identity theft and to protect the communications networks upon which Americans rely against cybersecurity threats. Moving forward, across use cases and sectors, AI has incredible potential to improve American 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. From a governance perspective, AI solutions will derive greater insights from infrastructure and support efficient budgeting decisions.

Today, people around the world encounter AI in their lives incrementally through the improvements they have seen in computer-based services they use, typically in the form of streamlined processes, image analysis, and voice recognition (we urge consideration of these forms of AI as “narrow” AI). The App Association notes that this “narrow” AI already provides great societal benefit. For example, AI-driven software products and services revolutionized the ability of countless Americans with disabilities to achieve experiences in their lives far closer to the experiences of those without disabilities.

Nonetheless, 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 USAID and other policymakers, the App Association has appended a comprehensive set of AI policy principles for consideration.² The App Association supports NIST's efforts to develop a voluntary prioritized, flexible, risk-based, outcome-focused, and cost-effective AI RMF, and strongly encourage USAID to align its Playbook with the principles we have developed based on the consensus of our diverse and innovative membership.

The App Association appreciates USAID's consideration of the above views. AI offers immense potential for widespread societal benefit, which is why the Playbook 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 Americans and others around the world. As society moves to adopt AI technologies on

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

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 USAID to contact the undersigned with any questions or ways that we can assist moving forward.

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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