



**AI
Advisory
Body**

Thank you for your interest in the Interim Report of the High-level Advisory Body on Artificial Intelligence.

The Body is seeking the broadest possible feedback on the [Interim Report \(https://www.un.org/sites/un2.un.org/files/ai_advisory_body_interim_report.pdf\)](https://www.un.org/sites/un2.un.org/files/ai_advisory_body_interim_report.pdf), and welcomes your comments.

Online submissions that adhere to the scope of the requested input may be made public, including contact names and organizations (but not specific contact details). Please note that only completed submissions will be considered. The form will remain open until 31 March 2024.

All questions below are required unless noted.

Please provide your organization / entity's name

ACT | The App Association

Please provide your organization / entity's sector

- Governmental
- Intergovernmental (e.g. UN, EU)
- Academia
- Private sector
- Nonprofit / Civil society
- Other (Please specify)

(Optional) Please provide a brief description of your organization / entity

(Maximum of 500 characters)

ACT | 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. We support the UN Secretary-General's AI Advisory Body's efforts to achieve a closer alignment between international norms and how AI is developed and rolled out. For more information on ACT | The App Association, please visit <https://actonline.org/>.

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Please select your organization / entity's primary location

(The below list includes the 193 UN Member States and the two non-Member State Permanent Observers. If Other, please specify)

United States of America

**(Optional) Please provide your organization / entity's website, if applicable**<https://actonline.org/>

Please provide contact information for an appropriate contact within your organization / entity

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Job title or area of expertise

Senior Global Policy Counsel

After reviewing the Interim Report, please provide your feedback on the following sections:

(If you have no input for a specific question below, you may leave it blank)

Opportunities and Enablers

(Maximum 3,000 characters)

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 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. 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. Past “narrow” AI, algorithmic decision tools and predictive analytics are having, and will continue to have, substantial direct and indirect effects on people around the world. Some forms of AI are already being used to improve lives today – for example, AI is used to detect financial and identity theft and to protect communications networks against cybersecurity threats. Moving forward, across use cases and sectors, AI has incredible potential to enable faster and better-informed decision making, enabled by cutting-edge distributed cloud computing.

The App Association details the range of opportunities for the responsible enabling of AI in its comprehensive AI policy recommendations, which are available at: <https://actonline.org/wp-content/uploads/Policy-Recommendations-for-AI.pdf>.

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Risks and Challenges

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The App Association agrees that, in addition to its numerous benefits and immense potential, AI also raises a variety of unique considerations for policymakers/governance. The App Association urges the UN Secretary-General's AI Advisory Body's recommendations to focus on bringing AI's benefits to all, balanced with necessary safeguards to protect end users. Specifically, the UN Secretary-General's AI Advisory Body's recommendations should support the development of flexible, risk-based, outcome-focused, and cost-effective AI governance approaches.

The App Association details the range of important measures that should be taken to address AI's risks and challenges in order to responsibly enabling of AI in its comprehensive AI policy recommendations, which are available at: <https://actonline.org/wp-content/uploads/Policy-Recommendations-for-AI.pdf>.

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Guiding Principles to guide the formation of new global governance institutions for AI

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The App Association has developed a comprehensive set of guiding principles that we encourage the UN Secretary-General's AI Advisory Body's recommendations to align with, which will support the responsible enabling of AI. These comprehensive AI policy recommendations are available at: <https://actonline.org/wp-content/uploads/Policy-Recommendations-for-AI.pdf>.

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Institutional Functions that an international governance regime for AI should carry out

(Maximum 3,000 characters)

An international governance regime for AI should support the development of flexible, risk-based, outcome-focused, and cost-effective AI governance approaches by countries; further, this international governance regime should develop and promote the ethical and equitable creation and deployment of AI. The UN can and should provide a forum for the free and open sharing of best practices and experiences that will inform countries as they tailor their governance approaches to AI.

We encourage the recommendations in the UN Secretary-General's AI Advisory Body's report to align its recommendations on Institutional Functions with the App Association's comprehensive AI policy recommendations are available at: <https://actonline.org/wp-content/uploads/Policy-Recommendations-for-AI.pdf>.

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Other comments on the International Governance of AI section (aside from Principles and Functions, covered in above questions)

(Maximum 3,000 characters)

We urge for the UN Secretary-General's AI Advisory Body's report's recommendations on the International Governance of AI to align with the App Association's comprehensive AI policy recommendations, which are available at: <https://actonline.org/wp-content/uploads/Policy-Recommendations-for-AI.pdf>.

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Any other feedback on the Interim Report

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