



22 December 2021

The Honorable Ron Wyden
221 Dirksen Senate Office Bldg.
Washington, D.C., 20510

Dear Senator Wyden,

On behalf of the US-based members of the IEEE, we would like to offer our support for the Algorithmic Accountability Act of 2021. As the engineers and scientists who are researching and developing artificial intelligence (AI) technologies, we agree that automated systems and machine learning are increasingly making critical decisions about all aspects of our lives. As such, Americans are potentially exposed to new risks from flawed or biased algorithms. While automated systems do have benefits, we are keenly aware of insufficient safeguards that protect Americans from data misuse by entities that increasingly rely on algorithms for decision-making.

The Algorithmic Accountability Act of 2021 provides welcome improvements upon the 2019 version by requiring companies to assess the impacts of automated systems, create transparency commitments, and empower consumers to make informed choices about the automation of critical decisions. Additionally, IEEE-USA believes the following:

- *Information disclosure:* We applaud the Act's requirement that covered entities disclose several elements of a company's algorithms to the FTC, such as performance testing documentation, on-going review of industry best practices, and explanation of potential impacts on consumers and steps used to mitigate them. One element that may enhance the pro-consumer nature of this Act is to require disclosure of any existing or perceived conflict of interest of the algorithm with respect to consumers. In making these parameters transparent, the FTC is explicitly informed as to the considerations that these tools are using in their decision-making process.

We thank you for your continued support of protections for Americans as AI becomes more and more integrated as a part of our daily lives. If we can be of any assistance, or if you have any questions, please do not hesitate to contact Erica Wissolik at (202) 530-8347 or e.wissolik@ieee.org.

Sincerely,

A handwritten signature in red ink that reads "William Robinson".

William Robinson
Vice President, IEEE-USA