

# The Latent Capability Problem

## Regulatory Scope

Modern AI regulation targets system **capability**, not just deployed configuration. The EU AI Act Article 6 evaluates what a system can do, not merely what it currently does

## Audit Limitations

Traditional compliance relies on documentation, configuration scans, and self-attestation. These methods cannot detect dormant capabilities embedded in hardware or system architecture

## Hidden Risk

Regulated systems may contain unused or inactive capabilities that remain present and potentially activatable. Static audits fail to surface these latent risks reliably

## Compliance Implication

Regulatory liability exists **prior to deployment**, independent of current configuration or intent. Capability presence may create compliance exposure under certain regulatory classifications

## THE PROBLEM

# Why traditional documentation fails modern AI compliance



## Static artifacts

PDFs and spreadsheets cannot capture inherited capabilities or conditional system relationships



## No traceability

Text-based reviews cannot reliably map system components to regulatory definitions



## Self-attestation

Current approaches rely on manual interpretation without systematic verification methods



## Documentation $\neq$ capability

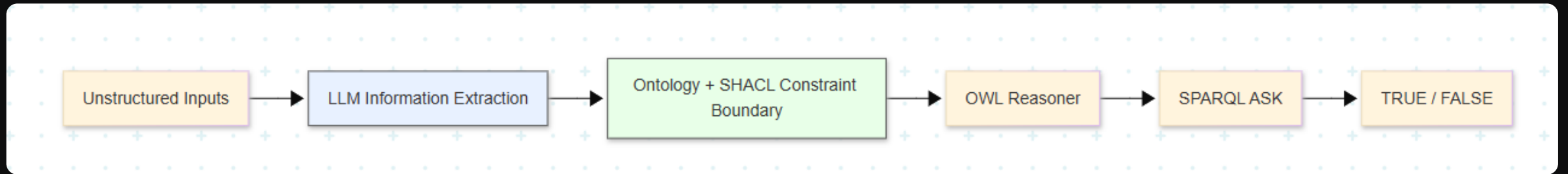
Describing what is configured cannot support defensible claims about what the system can do



## Latent risk

Compliance becomes documentation-heavy rather than verification-driven, hiding actual capabilities

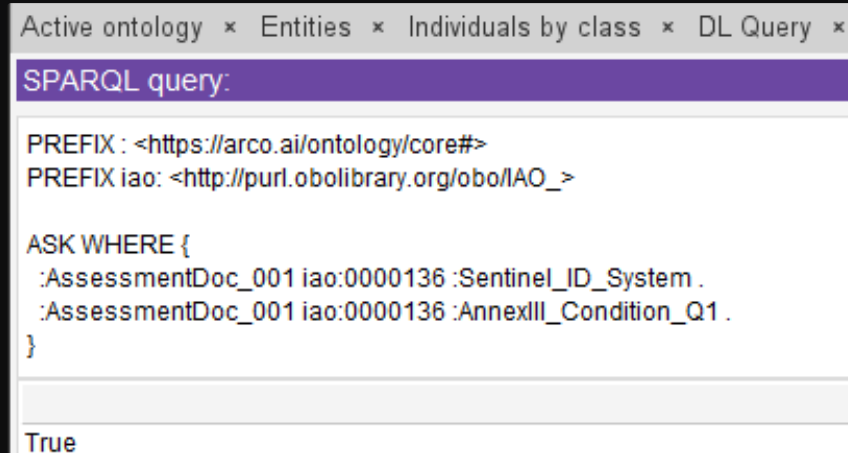
# ARCO: Neuro-Symbolic Reasoning Approach



**Architecture:** ARCO separates information extraction from compliance reasoning. Language models parse unstructured sources (manuals, specifications, policy text). All compliance evaluation occurs within a formal ontology aligned with regulatory definitions. Reasoning is deterministic and logic-based, not probabilistic—ensuring inspectable, auditable outcomes. The ontology encodes regulatory concepts, system components, and capability relationships, determining whether regulated capabilities are present independent of current configuration.

# Deterministic Outputs and Audit Traceability

Example: SPARQL ASK query evaluating Annex III high-risk condition against the Sentinel-ID system model.



The screenshot shows a web interface with tabs for 'Active ontology', 'Entities', 'Individuals by class', and 'DL Query'. The 'DL Query' tab is active, displaying a SPARQL query. The query is an ASK query that checks for the presence of specific entities in an ontology. The result of the query is 'True'.

```
SPARQL query:

PREFIX : <https://arco.ai/ontology/core#>
PREFIX iao: <http://purl.obolibrary.org/obo/IAO_>

ASK WHERE {
  :AssessmentDoc_001 iao:0000136 :Sentinel_ID_System .
  :AssessmentDoc_001 iao:0000136 :AnnexIII_Condition_Q1 .
}
```

True

## Binary, Not Probabilistic

Compliance questions are evaluated using deterministic queries that produce TRUE or FALSE outputs—eliminating probabilistic uncertainty from final compliance determinations.

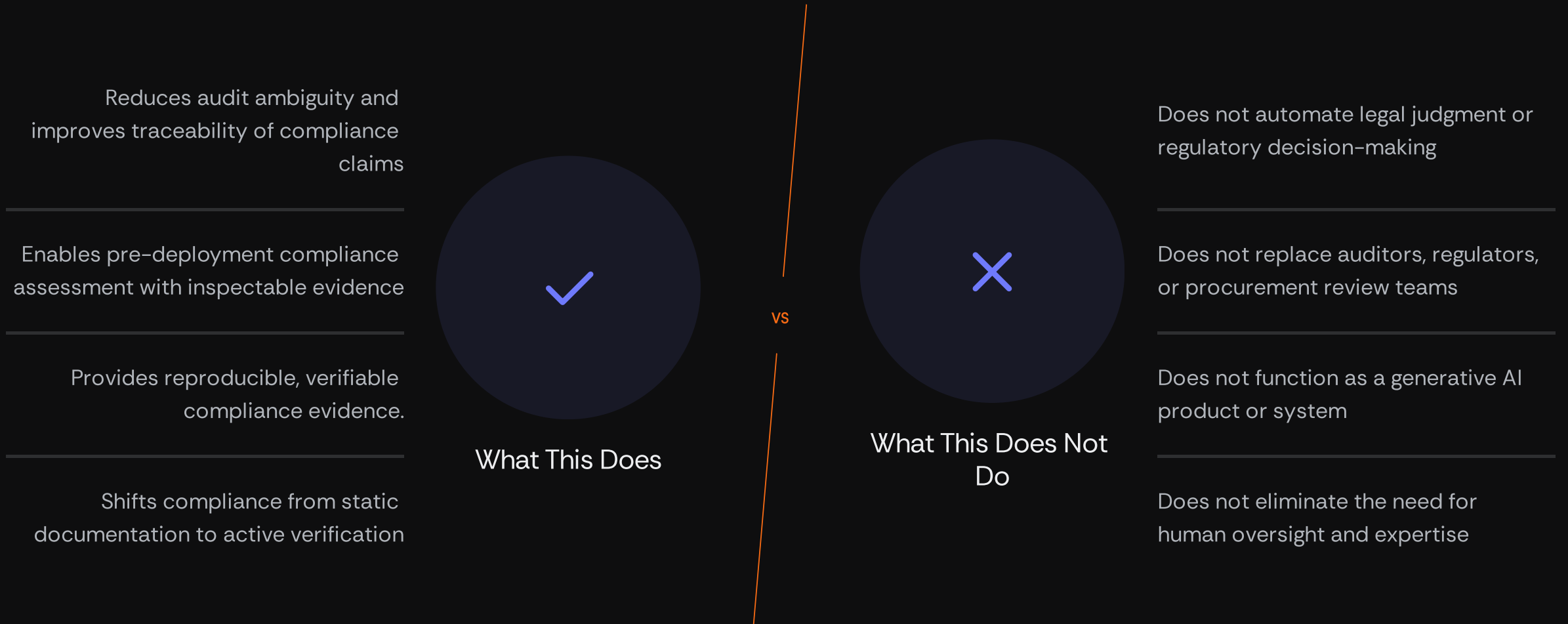
## Traceable Reasoning Paths

Each result includes an inspectable reasoning path that links system components directly to specific regulatory clauses, supporting audit review and regulatory submission.

## Independently Reproducible

Results can be independently verified by third-party reviewers, procurement evaluators, and auditors—ensuring transparency and defensibility throughout the compliance process.

# Value and Scope Limitations



This proof-of-concept capability supports—but does not replace—procurement, audit, and regulatory review processes.