



October 30, 2023

RESPONSE TO US COPYRIGHT OFFICE NOTICE OF INQUIRY CONCERNING STUDY OF ARTIFICIAL INTELLIGENCE AND COPYRIGHT¹

The Association for Computing Machinery (ACM) is the longest-established and — with more than 50,000 American members — the largest association of individual professionals engaged in all aspects of computing in the nation. A non-profit, non-lobbying, and otherwise wholly apolitical organization, ACM's mission includes providing unbiased, expert technical advice to policymakers on matters of our members' wide-ranging expertise. That work is accomplished in the United States by and through ACM's U.S. Technology Policy Committee (USTPC). USTPC broadly commends its sector-leading Code of Ethics and Professional Conduct² and the following specific recent policy products concerning artificial intelligence to the US Copyright Office for consideration in connection with this inquiry:

[Statement on Development and Use of Generative AI Content Detection Systems](https://www.acm.org/binaries/content/assets/public-policy/ustpc-gai-detection.pdf) (October 6, 2023)
[<https://www.acm.org/binaries/content/assets/public-policy/ustpc-gai-detection.pdf>]

[ACM TechBrief: Generative AI](https://dl.acm.org/doi/pdf/10.1145/3626110) (Summer 2023) [<https://dl.acm.org/doi/pdf/10.1145/3626110>];

[USTPC Comments to White House OSTP on National AI Priorities](https://www.acm.org/binaries/content/assets/public-policy/final-ustpc-ostp-ai-comments.pdf) (July 7, 2023)
[<https://www.acm.org/binaries/content/assets/public-policy/final-ustpc-ostp-ai-comments.pdf>]

[Principles for the Development, Deployment, and Use of Generative AI Technologies](https://www.acm.org/binaries/content/assets/public-policy/ustpc-approved-generative-ai-principles) (June 2023)
[<https://www.acm.org/binaries/content/assets/public-policy/ustpc-approved-generative-ai-principles>];

[ACM TechBrief: Safer Algorithmic Systems](https://dl.acm.org/doi/pdf/10.1145/3582277) (January 2023) [<https://dl.acm.org/doi/pdf/10.1145/3582277>];

[Statement on Principles for Responsible Algorithmic Systems](https://www.acm.org/binaries/content/assets/public-policy/final-joint-ai-statement-update.pdf) (October 2022)
[<https://www.acm.org/binaries/content/assets/public-policy/final-joint-ai-statement-update.pdf>].

USTPC stands ready to assist the Copyright Office with further technical and other analyses. Please contact its Technology Policy Office below for additional information or to arrange a briefing with one or more of USTPC's and ACM's expert members.

¹ See <https://www.govinfo.gov/content/pkg/FR-2023-08-30/pdf/2023-18624.pdf> as modified by <https://www.govinfo.gov/content/pkg/FR-2023-09-21/pdf/2023-20480.pdf>

² <https://www.acm.org/code-of-ethics>