July 12, 2023

Department of Industry, Science and Resources

Government of Australia

**Re:** **AI Accountability Policy Request for Comment (Docket No. 230407-0093)**

**Introduction**

Alteryx welcomes the opportunity to provide input to the Department of Industry, Science, and Resources on Safe and Responsible Artificial Intelligence (AI) policy. As AI technology rapidly evolves, Alteryx supports a strong role for the government of Australia in leading a collaboration with industry to establish guidance, standards, and policies to ensure the responsible development, deployment, and use of AI.

Alteryx is a leading provider of data science and analytics automation software in Australia and around the world. Alteryx delivers easy end-to-end automation of data engineering, analytics, reporting, machine learning, and data science processes, enabling enterprises everywhere to democratize data analytics across their organizations for a broad range of use cases.

Alteryx develops and deploys sophisticated low-code/no-code analytics software, including both on-premise and cloud-based offerings, that make advanced analytics and artificial intelligence/machine learning (AI/ML) generated insights available to workers in diverse fields of business and government. As a developer and deployer of AI systems offered to Australian users, Alteryx has a significant interest in Australia’s policies regulating or otherwise impacting the use of AI.

**Alteryx’s Approach to AI**

Alteryx is a developer, deployer, and user of a variety of AI systems and is a strong proponent of our obligation to act responsibly in each of these roles. In developing, deploying, and using AI, Alteryx is guided by these general principles:

***Data: the essential foundation of AI.*** Discussions of AI too often miss the critical point that an AI model is only as useful as the data from which it learns. AI systems depend on quality data for performance, accuracy, and reliability, as well as to reduce or mitigate potential harms and biases. Establishing user trust of AI relies on quality data inputs and an understanding of, and trust in, the analytical methodologies that generate data. It is imperative that the processes that AI uses to generate outputs are auditable, explainable, and reproducible.

***Ethics at the center.*** Alteryx believes that ethical considerations – including preventing bias and other potential harms, ensuring that AI systems are used fairly and for good purposes, addressing potential social and economic ramifications of AI-generated outputs, and safeguarding human rights – must be central to development, deployment, and use of AI.

***Transparency.*** Providing transparency to users is essential to enabling responsible and reliable use of AI products and services. . Transparency includes distinguishing between the roles organizations and users may play and the responsibilities of each role, different uses and risks of the technology, and information about the ways in which AI systems, models, and algorithms are intended to work.

***Built on trust.*** Users must be able to trust that AI technologies build privacy, security, and reliability into their design. Likewise, stakeholders throughout the AI ecosystem must be able to trust that intellectual property, trade secrets, and confidential information will be protected.

***Humans at the helm.*** AI won’t replace humans. It *will* automate many time-consuming tasks that involve executing a specific, defined, and repeatable outcome each time. It will reduce the manual, often mundane legwork best suited to a computer, leaving the human operators to do what they do best – think creatively. Yet, in replacing tasks performed by humans, AI does bring inherent risk- both to human workers and to those impacted by AI outputs . For that reason, strong, human-centered governance, guardrails, and standards are essential to ensuring that the workforce utilizing AI technologies are equipped to navigate changes to their daily work and trained to apply human review of AI outputs to identify and address potential risks and biases.

**Principles for Safe and Responsible AI**

AI policies should serve to identify and mitigate risk of societal harm, maintain a fair and competitive marketplace, promote innovation, and establish trust among users of AI products. As the Australian government considers how to establish and enforce regulations to ensure safe and responsible AI, Alteryx recommends that policies be crafted according to the following principles:

1. **Distinguish between high-risk and other AI.** Alteryx strongly supports the White Paper’s emphasis on a risk-based approach to address potential AI risk. Artificial intelligence covers a wide range of technologies, from linear regression models to generative large language models (LLMs), and may be used for a wide spectrum of purposes, with varying degrees of constraint. These differences produce vastly different risk profiles. For example, operational AI systems that directly engage with a user, unsupervised by a human operator, create higher risk than an analytical system that always has a human operator to interpret results. Recognizing the diversity of the AI ecosystem and the risk profiles of different AI systems and use cases, AI policies should focus on the most high-risk uses and the most consequential decisions.
2. **Recognize the different roles and responsibilities of AI developers and deployers.** An AI system’s supply chain is often diverse, with various entities responsible for designing, developing, deploying, training, and using AI systems. Many organizations occupy multiple roles at once; for example, Alteryx is a designer, developer, deployer, and user of AI technologies. Policies must account for these different roles and attach responsibilities appropriately. They should establish clear obligations according to role and ensure these obligations and criteria for demonstrating compliance are reflected in AI guidelines and standards.
3. **Align with internationally recognized standards.** Internationally recognized standards drive global interoperability, minimize administrative burdens that may hamper industry and innovation, and foster robust international collaboration in approaching technology policies. As governments around the world increasingly explore AI accountability policies, grounding these discussions in a shared commitment to recognized technical definitions, specifications, and best practices will improve policy outcomes and avoid confusion or enforcement gaps. A few broadly applicable standards that should be considered by the Australian government include the International Standards Organisation (ISO)/International Electrotechnical Commission (IEC) 27000 series of standards, as well as newly developed AI-focused standards such as ISO/IEC 22989 and 23053; ongoing efforts to develop new AI-focused standards should further inform policies as they mature.
4. **Implement a risk-based regulatory approach.** Government regulation can ensure a fair playing field across a chaotic competitive landscape, mitigate risk of harmful outcomes, and encourage global standardization and interoperability. Regulations should be:

* risk-based, requiring developers and deployers of high-risk AI to perform impact assessments to identify, document, and mitigate specific risks. Alteryx supports the impact assessment measures proposed by the U.S. National Institute for Standards and Technology’s (NIST) AI Risk Management Framework as a common foundation for risk assessment;
* performance-based and flexible, avoiding rigid design-based specifications; and
* oriented to address an AI system’s full life cycle, including project ideation; data acquisition; data preparation and model definition; validation, testing, and refinement of the model; and preparation for deployment and use.

1. **Build on existing privacy and security standards.** Privacy and security are essential to trust in AI systems and outputs. The Australian government should build on the existing corpus of policies, regulations, and standards governing privacy and cybersecurity, adding new regulations or specifications to address AI-specific considerations. Existing risk-based cybersecurity frameworks should be applied to AI systems to enhance evaluation of AI risk and identify necessary mitigations to ensure the AI’s safety and security.
2. **Prioritize transparency.** AI accountability policies should work to ensure that individuals and organizations that use AI systems have information necessary to help them understand their interactions with the AI. That information should include, at minimum, the intended purpose(s) of the AI, limitations and risks associated with the AI or any outcomes, how individuals may be impacted by AI outcomes, and how the AI has been evaluated against safety, security, privacy, elimination of bias, and other criteria.

**Potential Gaps in Approaches.**

In addition to seeking input on regulatory approaches, the White Paper inquires whether there are further non-regulatory initiatives the Australian government could implement to support responsible AI practices in Australia. Without question, one such initiative must be to prepare the workforce to harness the potential, and mitigate the risks, of AI.

AI policies will only be successful to the extent that the workforce – both in the public and private sectors – is capable of understanding, implementing, and enforcing these policies across industries and uses of AI technologies. Creating that capability requires investment in training and education to foster basic AI and data literacy to enable a diverse workforce to harness the potential of AI systems. Additionally, while AI will bring specific efficiencies to the workplace by eliminating more mundane tasks for some workers, AI and data literacy upskilling will be essential to prepare these workers for new roles. AI policies must plan for how to facilitate this transition.

Crucially, efforts to prepare a diverse workforce for responsible adoption of AI technologies must approach upskilling broadly, rather than simply seeking to recruit more highly skilled data scientists. As the AI Roadmap recently published by CSIRO, Australia’s National Science Agency, noted, Australia’s economy will require dramatic growth in AI specialist workers over the next few decades, yet “[a]lready supply is failing to meet demand”.

A different model is needed. Data scientists and other specialists can help solve the most challenging technical problems, but basic data and AI literacy will be needed across the workforce to harness AI’s potential. Ultimately, this approach will not only help meet the needs of the AI-powered economy, but also ensure workers are not left behind.

In the public sector, as AI and related technologies become a mainstream means of driving organizational efficiency and productivity, nearly every government worker will become a data worker. The Australian government must ensure these workers receive modern and continuous training—including learning through applied exercises and experimentation—to synthesize, analyze, and automate data processing to solve organizational problems.

**Conclusion**

AI technologies offer tremendous potential benefits for the global economy and society. At Alteryx, we deliver innovations that enable organizations to combine AI systems with powerful and trusted data connections, data cleansing and reconciliation capabilities, and data analytics and visualization products that improve user efficiency and productivity, improve analytic quality, and drive innovation. However, we are also cognizant of the inherent risks of developing or deploying AI technologies without due diligence and accountability. For that reason, we look forward to working with the government of Australia in support of a pragmatic, risk-based, and agile regulatory regime that enforces accountability and safety across the AI ecosystem.

We look forward to continuing this important dialogue.

Sincerely,



**Tommy Ross**

**Head of Global Public Policy | ALTERYX**