

**Consultation on the White Paper on Artificial Intelligence - A European Approach**  
**CONFIDENTIAL: NOT FOR PUBLICATION**

The commission's paper on Artificial Intelligence identifies the potential of the technology and the desirability and importance to the EU of global leadership in the field of AI.

The commission aspires to a European way of enabling scientific breakthrough and preserving the EU's technological leadership, taking a regulatory and investment-oriented approach.

Umnai has made substantial scientific breakthroughs in the field of Artificial Intelligence and patented a portfolio of technologies that will significantly disrupt the global AI industry.

Umnai is an early stage European leaning, European start-up in "stealth mode". We know our technology is disruptive enough to be an inflection point, resetting large parts of the AI industry including the major incumbents and the data primacy players.

While we have a long road ahead, we are confident we are a unicorn in the making.

When launched, Umnai's new technology will significantly shift the AI frontier and redefine how risk, transparency, human agency and control in AI are perceived and valued.

So fundamentally will Umnai's technology change the basic understanding of what is and is not possible in AI, that much of what the whitepaper identifies as inhibitors or problems to be mitigated will be completely reframed.

A post black-box AI technology paradigm will foster a new fertile period of advancement across every area of AI application, research and deployment.

We are certain the future of AI will be unrecognizably different from the present. We believe AI will rapidly evolve from an alchemy of rarified skill, massive compute power and monopolized oceans of data to a pervasively accessible technology environment where everything is accessible, transparent, explainable and manageable.

We see the current brute force methods of massive data and massive compute power giving way to a paradigm where humans collaborate with and coach machine learning, sharing human experience, wisdom and knowledge and creating better outcomes with less.

This consultation is not the proper forum for us to detail or disclose our technology, but we are encouraged by the synchronicity between the detail in the whitepaper and the technical products in our labs.

We are responding to the consultation to introduce ourselves and provide a brief commentary to Europe's high-level aspirations from our perspective as an emerging disruptive startup.

We believe that success and dominance in AI for a nation or continent will come not from a handful of groundbreaking policies or investment programs but from the cumulative momentum of moving the needle on thousands of individual projects.

We are encouraged that the commission recognizes, values and supports breakthrough technologies.

We wonder if Europe can leverage and rapidly diffuse frontier shifting technology through an agile eco-system of well-incentivized and supported stakeholders.

We hope Europe can do both these things well enough to capture and keep enough tangible value to achieve global leadership.

We recognize the speed, confidence and culture with which the American entrepreneurial eco-system moves and how it has historically outpaced Europe, breeding more unicorns that mature to dominant market positions. We are encouraged that Europe plans to change that legacy.

We perceive Europe to have a proud culture of transparent, deliberate and cautious consensus yet we know that technology disruption is inherently opaque, impatient and non-consensual.

We wonder if Europe can be a catalyst for new business, working with impatient, driven and determined startups like us to shape and create new markets.

At this exciting inflection point for AI and the world it will serve.

To quote the second paragraph of the whitepaper, "against a background of fierce global competition" we are enthusiastic, confident and eager to work with Europe.

We would be happy to engage in detailed dialogue with the commission and expert groups in any appropriate forum.

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