

## **Comments on OECD Framework for the classification of AI systems-preliminary findings**

The document presents a great technical and analytical detail on AI systems, covering all edges of the technology.

As a technological convergence, we consider that in the section dedicated to data and input (Section 2), it could be relevant to deepen the issues associated with the rights and identifiability of the data. The issue of the protection and use of personal data is a latent concern.

In the sections of data and input (Section 2) and AI model (Section 3) it could be necessary to detail the analysis of the scope and criteria to be applied to the data generated by the system itself, given its cognitive and self-learning nature. A self-learning system tend to contribute to decision-making based on the processed data; so, we suggest that the document could analyze the processed data and their scope with greater specificity.

In addition, we have the following comments:

- The Table 1 could use the same names of AI principles, in particular the Principle 1.2 Human rights, privacy and fairness and the Principle 2.1. Investment in R&D.
- In line 18, one country could be a broad deployment in the sense that the number of individuals that are or will be affected by a system could be greater than one sector. We suggest one county instead of one country.
- In Section 1 (Context), we suggest additional optional criteria that could be "Benefits and risk to competition, consumer protection, diversity and plurality", because this criterion could not be included in "Benefits and risks to human rights and democratic values" and "Benefits and risks to well-being".
- In Section 2 (Data and input, p. 21), we suggest additional optional criteria such as "Data verification and validation". There are different techniques of data verification and validation that could have implications on Principle 1.4 Robustness, security, safety and Principle 1.5. Accountability.
- In Section 3 (AI Model, p. 28), we suggest additional optional criteria such as "Model verification and validation". There are different techniques or methods of verification and validation that could have implications on Principle 1.4 Robustness, security, safety and Principle 1.5 Accountability.