I am writing today with regards to the Public Consultation Phase of the Use of New Artificial Intelligence Technologies Policy.

There are several massive shortfalls in the current policy that I feel aren’t being addressed properly, and that full consideration hasn’t been made that I will detail below:

**Cost**

What is the full and complete cost of these new artificial intelligence technologies that are proposed to be used **as well as** the AI technology currently in use that received no public consultation?

**Public Consultation**

Why has AI technology been implemented by the TPS prior to any consultation with the public? Why is the (late) public consultation period only for a month? Furthermore, why is the window to stop using any AI technology already in use that is retroactively identified as extreme risk open until December 2024? That’s not good enough, if a system is deemed illegal why would it continued to be used for a potential 2 years?

Why is the consultation period and finalization a fraction of the time allowed for the TPS to fix issues?

**Abuse Safeguards**

Why is there already a use of AI technology by the TPS before consultation has occurred with experts and stakeholders to determine the procedures and processes for the review and assessment of the systems? Abuse could have already occurred; the systems could already be adversely affecting minorities and other groups that have been traditionally impacted by the use of AI technology.

Unless the “human-in-the-loop” is an impartial third party with knowledge of the traditional issues with AI technology and no ties to the TPD or any of its affiliated organizations, this would be nothing but a symbolic safeguard. We need assurances that this won’t just be a rubber stamp position.

Why are high-risk technologies (those that can be impacted by poor, biased data whether based on biased data generated by the TPD or malicious actors, and cannot be fully explained in how it works) even allowed to be considered? What possible benefit outweighs all of those risks and red flags?

What “method” is the Executive Director planning to create that will allow members to submit concerns pertaining to the AI technologies, and why is this not in place considering the TPD is already using AI technologies? What is the expected timeline of this “method”?

In summary, we need clear transparent cost breakdowns, tighter timelines for implementation of the safeguards and systems that should have **already** been in place and for more responsibility to be taken with regards to the initial implementation of AI technology without public consultation or any of these safeguards already in place. Any reviews should be conducted by impartial, unaffiliated third-party experts in the field.

The TPS seems like it’s putting the cart before the horse and my main question is how can we be sure this won’t happen the exact same way it did the first time with how vague and lax the new proposed policy is?