

MEMO# 35771

July 12, 2024

ICI Draft Comment Letter on Treasury Department Request for Information on Uses, Opportunities, and Risks of Artificial Intelligence in the Financial Services Sector; Comments Due by July 22 at 12:00 pm ET

[35771]

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TO: Operations Committee

SEC Rules Committee

Small Funds Committee

Technology Committee RE: ICI Draft Comment Letter on Treasury Department Request for Information on Uses, Opportunities, and Risks of Artificial Intelligence in the Financial Services Sector; Comments Due by July 22 at 12:00 pm ET

Attached for your review is a draft ICI comment letter to U.S. Department of the Treasury's ("Treasury") "Request for Information on Uses, Opportunities, and Risks of Artificial Intelligence in the Financial Services Sector" (the "RFI").^[1] Treasury issued the RFI on June 12th, please see the ICI memo summarizing the RFI here: <https://www.ici.org/memo35744>.

The RFI includes 19 questions soliciting comments on three broad areas: (1) general use of AI in financial services, including use cases, types of models being employed, and variability in use and access to AI across financial institutions; (2) actual and potential opportunities and risks related to use of AI in financial services, including opportunities and risks on impacted entities, particularly as it relates to bias, discrimination and privacy; and (3) further actions to advance responsible innovation and competition within the financial services sector with respect to the use of AI. ICI's response letter broadly covers these three general themes at a very high level and responds with the intention of opening a dialogue with Treasury and other financial regulators on the regulation of AI.

Comments on the RFI are due to Treasury by Monday, August 12, 2024. The draft letter includes several areas where ICI seeks member feedback. To ensure that we have sufficient time to incorporate or address your views before August 12th, please provide me with any

feedback or comments by email at mitra.surrell@ici.org no later than 12:00 pm Eastern Time on Monday, July 22.

Mitra Surrell
Associate General Counsel, Markets, SMAs, & CITs

Notes

[1] Request for Information on Uses, Opportunities, and Risks of Artificial Intelligence in the Financial Services Sector, 89 Fed. Reg. 50048 (Jun. 12, 2024) available at <https://www.govinfo.gov/content/pkg/FR-2024-06-12/pdf/2024-12336.pdf>.

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