

Comment from Special Counsel Jeffrey S. Lubbers on Agency Use of Artificial Intelligence  
December 11, 2020

Footnote 7: I confess I never heard of the US Digital Service. I would propose adding “(within the Executive Office of the President)” after its mention.

Paragraph 5—How does the Paperwork Reduction Act factor into this data gathering effort?

Line 125—I would substitute “way” for the second “manner” just to avoid repetition.

Line 155-query whether IGs are internal or external.