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Comments for consideration on Human Rights and Technology discussion paper dated December 2019.

I am grateful to the Australian Human Rights Commission for the opportunity to submit my comments for consideration on the Human Rights and Technology Discussion Paper dated December 2019. Given I missed the original due date, I have kept my comment to a minimum; intact, the comprehensive analysis, inclusiveness, diligence and exemplary professionalism that are reflected in the discussion paper gives little room for additional comments anyway:

[Chapter 12, Part A, Proposal 1]

The National strategy should also include a framework for retrospective review and to drive accountability for *correcting existing* artefacts based on AI where a violation of human rights could have occurred due to use of such technology.

[Chapter 12, Part B, Question A]

The scope of discussion should include Artificial General Intelligence. Even if implementation of Artificial general intelligence where the machine is indistinguishable in all respects from humans may not become common place until say 2060**, the extent of research activities underway in the chase to build AGI and the opportunities for violation of fundamental human dignity requires immediate oversight. Use of AI in AGI research may hide the brutalities that humans may be encountering during the research phase even from the eyes of the researchers; information that would enable the enforcement of necessary laws to prevent such violations now. I refer to situations of treatments denied to women with breast cancer to study the progress of the disease in the pre-Helsinki declaration days- such practices can not be repeated in other research fields today and go unaccounted for. (over 50 of participants in a 2012 survey by Future of Life Institute

**ref: ~55 AI researchers put the date at 2022 in 2012/2013 survey by *Vincent C. Muller, the president of the European Association for Cognitive Systems, and Nick Bostrom from the University of Oxford, who published over 200 articles on superintelligence and artificial general intelligence (AGI), conducted a [survey](#) of AI researchers.*

[Chapter 12, Part B, Question B]

Not necessarily- alternate could be to hold the person making the decision to

incorporate AI into the decision making of those responsible reliant on AI to be held accountable for the shortcomings of AI.

Other, probably more appropriate mode of driving accountability would be to get the technology vendor to demonstrate the AI based tools they placed in the hands of the users used as they intended it to be used and the user had been provided with adequate training or information on its appropriate use. After all such is the level of consumer expectation and regulatory assurance (TGA) in this country for so much as a strip of bandaid to act as a protective cover for a skin aberration, why would we accept anything less from the AI vendors with a pipeline investing in AGI research to build algorithms that are indistinguishable from humans?

[Chapter 12, Part B, Question C]

The burden of proof of compliance to claims is with the vendor of the AI product. The extent of reliability of the functionality provided by the algorithm in aiding the decision need to have been clearly communicated to the user where applicable, in comparison with alternate available methods not incorporating AI.

[Chapter 12, Part B, Question D]

Decision makers require reliable information and systems that can provide them with such information. The burden of validating their systems to provide such information is with the vendors. AI algorithms feed on not insignificant amount of data collected on assumptions that would be meaningful to the designers/vendors. Its unreasonable to expect users to intervene to compensate for inadequate validation on the vendor's part.

[Chapter 12, Part B, Proposal 14]

Request a review of proposal 14: assessment of adequacy of implementation of human rights can not be a non-human activity, meaning, it can not be ascribed to a tool-kit.

[Chapter 12, Part D, Question I]

The Australian government, in collaboration with comparable foreign governments should develop ethical standards that would ensure the integrity of tele communication using voice over IP. This is particularly relevant as the current technological advances in developing voice recognition systems may have inadvertently compromised the reliability of voice received over IP as a unique identifier.

Thank you.

Sincerely,
Sumathy

Monday 25 May 2020

* a nascent organisation I founded as a concerned citizen to systematically protect us from situations where our reliance on software based solutions fail us;

the organisation has not secured an engagement yet.