S No.	Basic Details	Clause/Subclause No.& Attachment	Paragraph No./Figure No./Table No	Type of Comment	Comments/Suggestions along with Justification for the Proposed Change	Proposed Change/Modified Wordings	Member Secretary Observations	Status	Reviewer	Reviewer Comments
1	Name: ChandraSRK Organisation: N/A Comment ID #: LITD_2024-02-291123	All clauses N/A	All clauses	General	Please provide access to the draft standard to review and provide comments: Information Technology - Artificial Intelligence-Management System Without providing draft access, it is difficult to provide comments,	Please provide access to the draft standard to review and provide comments: Information Technology - Artificial Intelligence-Management System Without providing draft access, it is difficult to provide comments,	No action required. Documents were shared for further inputs.	Closed	ChandraSRK	NA

| 2 | Name: ChandraSRK
Organisation: N/A
Comment ID #: LITD_2024-03-036461 | N/A
General | | General | recommended to add requirements specific to AI management Plan, AI Risk Management Plan(this includes ai risk treatment as well) | recommended to add requirements specific to AI management Plan, AI Risk Management Plan(this includes ai risks treatment as well) | Risk Management is about Risk assessment and treatment. These aspects are already covered in 6.1, 8.2,8.3. In view of this no change is required. | LITD30 | ChandraSRK | "6.1 Actions to address risks and opportunities" sub-clause covers only Risk and opportunities associated with AI System.
"6.2 AI objectives and planning to achieve them" sub-clause covers to some extent AI system Planning.
8.2 is about AI risk assessment
8.2 is about AI risk treatment
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"A2.4 Review of the AI policy" talks about review of AI policy at planned intervals to ensure its suitability, adequacy and effectiveness.
"A6.2.5 AI system deployment" talks about deployment plan |

| 3 | Name: ChandraSRK Organisation: N/A   Comment ID #: LITD_2024-03-034885 | Introduction N/A | Last Paragraph | General | highly recommended to maintain overall structure of this AI Management System standards to align with of the Basic management standard: (Refer ISO 9001:2015 , ISO/IEC 27001:2022) 4.4 AI management system --> 4.4 AI management system and its processes 5.3 Roles, responsibilities and authorities --> 5.3 Organizational roles, responsibilities and authorities 3. Applicable to other sections too | for ex. 4.4 AI management system and its processes 5.3 Organizational roles, responsibilities and authorities | 4.4 is same as 27001, such minor differences are there in between 9001 and 27001 as well. We could take up this at ISO/IEC level. | ISO/IEC | ChandraSRK | Suggest you take up with ISO/IEC., as specifying process related info is important recommended to have 4.4 AI management system and its processes instead of 4.4 AI management system . And retain relevant process related description , refer 4.4.2 clause in ISO 9001:2015 |

4	Name: ChandraSRK Organisation: N/A Comment ID #: LITD_2024-03-034477				AI management system maintenance aspects not mentioned in the following statements: The organization's needs and objectives, processes, size and structure as well as the expectations of various interested parties influence the establishment and implementation of the AI management system. Another set of factors that influence the establishment and implementation of the AI management system are the many use cases for AI and the need to strike the appropriate balance between governance mechanisms and innovation. This needs to be corrected as The organization's needs and objectives, processes, size and structure as well as the expectations of various interested parties influence the establishment, implementation and maintenance of the AI management system Another set of factors that influence the establishment, implementation and maintenance of the AI management system are the many use cases for AI and the need to strike the appropriate balance between governance mechanisms and innovation.	The organization's needs and objectives, processes, size and structure as well as the expectations of various interested parties influence the establishment, implementation and maintenance of the AI management system Another set of factors that influence the establishment, implementation and maintenance of the AI management system are the many use cases for AI and the need to strike the appropriate balance between governance mechanisms and innovation.				Suggest you take up with ISO/IEC. Consider the following to improve even the readability: The establishment, implementation and maintenance of the AI management system are influenced by various factors: - within the organization, including its needs, objectives, processes, size, and structure, as well as the expectations of different stakeholders. - Numerous use cases for AI - Necessity to maintain a balance between governance mechanisms and innovation
		N/A	4	Technical				ISO/IEC	ChandraSRK	
							Comment is on Introduction. Its not a requirement. 7.1 is requirement and that has mentioned the maintenance aspects. In view of this no change is			

5	Name: ChandraSRK Organisation: N/A Comment ID #: LITD_2024-03-034121	Introduction N/A	5	General	"Crucial examples of such management processes are:" missed to cover the following: Requirements for products and services, Design and development of products and services. processes for Requirements for products and services, Design and development of products and services.	processes for Requirements for products and services, Design and development of products and services.	Comment is on Introduction. These are just examples and not an exhaustive list. Moreover these points are covered by life cycle example. In view of this no change is required.	LITD30	ChandraSRK	Please revisit this , then see to add following: - Life cycle processes applicable to development and maintain AI System
6	Name: ChandraSRK Organisation: N/A Comment ID #: LITD_2024-03-031548	Introduction N/A	5	General	recommend to have diagrams for intended user of this standards , to improve level of understanding:	recommend to have diagrams for intended user of this standard , to improve level of understanding: How this standard relates to standards: MSS/AI/Life Cycle	Please provide diagram and accordingly we can take up at ISO/IEC level.	LITD30	ChandraSRK	Refer the sheet: "Diagrams" for draft picture on : AI Standards and How they related. Useful for New readers, quick understanding

7	Name: ChandraSRK Organisation: N/A Comment ID #: LITD_2024-03-034427	N/A 3.24	1	General	AI system impact assessment definition 1. doesn't include impact on organization or any entities	formal, documented process by which the impacts on one or more of: individuals, groups of individuals, societies or organization are identified, evaluated and addressed by an organization developing, providing or using products or services utilizing artificial intelligence	Agree to the rational, similar comments were provided for 42005 as well however not agreed by SC 42. We may discuss and again take up at ISO/IEC level.	ISO/IEC	ChandraSRK	Discuss and take up with ISO/IEC
8	Name: ChandraSRK Organisation: N/A Comment ID #: LITD_2024-03-034267	/A 4.4		General	extra word document introduced in the standard, which is not required: The organization shall establish, implement, maintain, continually improve and document an AI management system, including the processes needed and their interactions, in accordance with the requirements of this document.	The organization shall establish, implement, maintain and continually improve an AI management system, including the processes needed and their interactions, in accordance with the requirements of this document.	For specificity, 'this document' is required, It is fine and inline with the standards practices. In view of this no change is required.	LITD30	ChandraSRK	I am referring the "document" used after implement. Please re-check again

9	Name: ChandraSRK Organisation: N/A Comment ID #: LITD_2024-03-034245	A 5.1		Editorial	5.1 Leadership and commitment following important statement missing specific to AI management system process: promoting the use of the process approach and risk-based thinking;	promoting the use of the process approach and risk-based thinking relevant for AI Management system	This is not mentioned in 27001 as well. Its mentioned in 9001 so in way its covered. Further Note 2 is referring to Responsible approach. In view of this if required we can take it up at ISO/IEC level.	ISO/IEC	ChandraSRK	take up with ISO/IEC
10	Name: ChandraSRK Organisation: N/A Comment ID #: LITD_2024-03-034490	A 5.1		Editorial	lists of items can be given numbering as applicable such as a), b) etc instead of -- (refer 5.1 Leadership and commitment, applicable to entire document")	lists of items can be given numbering as applicable such as a), b) etc instead of -- (refer 5.1 Leadership and commitment, applicable to entire document")	It is as per houst style so no change is required. Its good to have numbered list so it may be mentioned to ISO/IEC for ensuring this in next revision.	ISO/IEC	ChandraSRK	numbering always helps in traceability and mapping requirement across standards
11	Name: ChandraSRK Organisation: N/A Comment ID #: LITD_2024-03-034081	A 5.2		General	recommend to maintain document structure as per the standard section: Compatibility with other management system standards, but 5.2 AI Policy not maintaining structure	5.2 AI policy 5.2.1 Establishing the AI policy 5.2.2 Communicating the AI policy	This is related to the general comment (Comment ID #: LITD_2024-03-034885). such minor differences are there in between 9001 and 27001 as well. We could take up this at ISO/IEC level.	ISO/IEC	ChandraSRK	take up with ISO/IEC

| 12 | Name: ChandraSRK Organisation: N/A Comment ID #: LITD_2024-03-039949 | N/A 6.1 | | Editorial | 6.1.3 AI risk treatment < Taking the risk assessment results into account, the organization shall define an AI risk treatment process to:> following observation on above statement 1. Risk treatment need not to be separate process, , it is activity in Risk management process 2. Define is not standard word to use in MSS | The organization shall establish, implement and maintain AI risk treatment activities that support | Yes it is agreed that risk treatment is an activity inside risk management. However this structure and usage of term 'define' are in line with 27001. In view of this no change is required. | Discuss | ChandraSRK | establish is the standard word used in MSS, but not define. We need to take ISO 9001 as base. |

| 13 | Name: ChandraSRK
Organisation: N/A
Comment ID #: LITD_2024-03-037822 | /A
6.1.1 | | Technical | 6.1.2 AI risk assessment
< The organization shall define and establish an AI risk assessment process that:>
following observation on above statement
1. Risk Assessment need not to be separate process, it is activity in Risk management process
2. Define is not standard word to use in MSS
3. implement, maintain missing in the following requirement:
The organization shall define and establish an AI risk assessment process that: | The organization shall establish, implement and maintain AI risk criteria activities that support | Proposed Change mentioned is for 6..1. however comment is referring to 6.1.2. Regarding addition of 'Implement' we may take up at ISO/IEC level | Discuss | ChandraSRK | Column C: to be corrected as 6.1.2 instead of 6.1.1 |

14	Name: Sundar Narayanan	/A 6.1.1		Technic al	The organization shall determine the risks and opportunities shall be based on: 1. domain, industry environment, application environment, 2. intended use (scope, nature, context and purpose), 3. regulations or standards, organizational policy, industry guidelines	The organization shall determine the risks and opportunities according to: — the domain and application context of an AI system; — the intended use; - regulations, standards, industry guideline relating to the use case	regulations, standards, industry guideline relating to the use case' is covered by 'the external and internal context described in 4.1'. In view of this no change is required.		Sundar Narayanan	
15	Name: Sundar Narayanan	N/A 6.1.2		Technic al	AI risk assessment does not explain the need for appropriately identifying risk appetite and risk tolerance. The risk appetite and risk tolerance could help in determining the level of risk.	b) ensures repeated AI risk assessments can produce consistent, valid and comparable results;	Proposed change is same as the existing content of the standard. Further, risk appetite and risk tolerance has to be defined by the organization as per their risk criteria. Please refer 6.1.1. In view of this no change is required.		Sundar Narayanan	
16	Name: Sundar Narayanan	N/A 6.1.2		Technic al	AI risk assessment shall consider the level of risk based on four key factors namely, relevance, severity, likelihood, and detectability	The organization shall define and establish an AI risk assessment process that: e) 3) evaluate AI risks by comparing them based on relevance, severity, likelihood, and detectability	ISO/IEC 23894 is mentioned here and ISO/IEC 23894 is based on ISO 31000. In view of this no change is required.		Sundar Narayanan	

17	Name: ChandraSRK Organisation: N/A Comment ID #: LITD_2024-03-032442	N/A 6.1.2		Technical	6.1.2 AI risk assessment Need correction in following statement b) is designed such that repeated AI risk assessments can produce consistent, valid and comparable results;	b) ensures repeated AI risk assessments can produce consistent, valid and comparable results;	Rational for proposed change is not mentioned so no change is required.	Discuss	ChandraSRK	Rationale: Designed is not a standard word used in MSS
18	Name: Sundar Narayanan	/A 6.1.3		Technical	The section on AI risk treatment focuses more on controls. It ignores other treatment methods including transfer of risks. Also, it does not exhibit that disclosure of potential risk to customers and other stakeholders could also be a possible treatment (This approach is widely used in healthcare drug approval process).	Taking the risk assessment results into account, the organization shall define an AI risk treatment process to: h. Apply appropriate efforts towards transfer of the risk i. Disclose potential limitations and known adversities / risks caused by the AI performance to its customers	It has also mentioned about formulation of AI risk treatment plan. There is further guidance in Annex-B and 23894. 23894 specifically mentions 'sharing the risk'. In view of this no change is required. Please see if any further additional guidance need to be included for taking up at ISO/IEC level.	Others	Sundar Narayanan	

19	Name: Sundar Narayanan				Technical	AI system impact assessment is not defined. It shall consider the requirements including the privacy implications, harms, bias, accountability, robustness, security, safety, systemic societal impact assessment to assess the implications to the society	AI System impact assessment shall cover assessment of risks associated with privacy, harms, bias, accountability, robustness, safety, security and systemic societal impact assessment.	AI system impact assessment is defined at 3.24. for further guidance, refer 42005. In view of this no change is required.	Others	Sundar Narayanan	
		6.1.4									
20	Name: ChandraSRK Organisation: N/A Comment ID #: LITD_2024-03-034164	N/A 8			Technical	8 Operation recommend to maintain document structure as per the standard section: Compatibility with other management system standards sub section in introduction says high level structure is maintained, but 8 Operation subsections fails to maintain high-level structure with ISO 9001: for ex design and development of AI systems section missing	8.2 Requirements for products and services 8.3 design and development of AI systems 8.4 Control of externally provided processes, products and services 8.5 Production and service provision	This is related to the general comment (Comment ID #: LITD_2024-03-034885). such minor differences are there in between 9001 and 27001 as well. We could take up this at ISO/IEC level.	ISO/IEC	ChandraSRK	Please discuss with ISO/IEC to have uniformity across all MSS,

21	Name: ChandraSRK Organisation: N/A Comment ID #: LITD_2024-03-038668	N/A 9.2.2		Technical	9.2.2 Internal audit programme < ensure that the results of audits are reported to relevant managers.> to be re-phrased as <ensure that the results of audits are reported to relevant authority in organization.>	ensure that the results of audits are reported to relevant authority in organization.	27001 and 9001 has used term 'relevant management'. We may take up at ISO/IEC level	ISO/IEC	ChandraSRK	I have checked again ISO 9001, ISO 27001. "Manager" is not a standard word used in MSS, so check with ISO/IEC.
22	Name: ChandraSRK Organisation: N/A Comment ID #: LITD_2024-03-036614	N/A A.5		General	A.5 Assessing impacts of AI systems Objective: To assess AI system impacts to individuals or groups of individuals, or both, and societies affected by the AI system throughout its life cycle Can be re-phrased as To assess AI system impacts to one or more of: individuals, groups of individuals, organization or societies throughout AI System life cycle	To assess AI system impacts to one or more of: individuals, groups of individuals, societies or organization throughout AI System life cycle	Similar to Comment ID #: LITD_2024-03-034427	Discuss	ChandraSRK	Additionally, some sentence also changed here
23	Name: ChandraSRK Organisation: N/A Comment ID #: LITD_2024-03-031196	N/A A.6.2		General	A.6.2 AI system life cycle title is similar to A.6.AI system life cycle so A.6.2 AI system life cycle can be changed to A.6.2 AI system life cycle stages	A.6.2 AI system life cycle stages	We may take up at ISO/IEC level	ISO/IEC	ChandraSRK	Discuss and take up with ISO/IEC

24	Name: ChandraSR K Organisation: N/A Comment ID #: LITD_2024-03-032424	N/A A6.2		General	A.6.2 AI system life cycle need to cover additional entry for effective integration of AI sub system with overall system	effective integration of AI sub system with overall system	There is no concept of AI sub-system. This document is also about AI system. We may discuss and accordingly take up at ISO/IEC level	Discuss	ChandraSR K	Ideally speaking we don't have any thing like 100% AI system. Any AI based system contains AI component + non AI component. Interface between these is important, hence proposing for AI subsystem terminology and its integration
25	Name: ChandraSR K Organisation: N/A Comment ID #: LITD_2024-03-034666	N/A A6.2		General	A.6.2 AI system life cycle need to cover additional entry for quality management of AI sub system with overall system	quality management of AI sub system with overall system	There is no concept of AI sub-system. This document is also about AI system. We may discuss and accordingly take up at ISO/IEC level	Discuss	ChandraSR K	Rationale: We need to plan for AI system Quality Management as well. If not where this is being addressed
26	Name: ChandraSR K Organisation: N/A Comment ID #: LITD_2024-03-032200	N/A A. 6.2.2		General	A.6.2.2 contains word material which is not standard word in management system standards> The organization shall specify and document requirements for new AI systems or material enhancements to existing systems.	The organization shall specify and document requirements for new AI systems or enhancements to existing systems.	Agree, 'material' word may not be required. We may take up at ISO/IEC level.	ISO/IEC	ChandraSR K	Discuss and take up with ISO/IEC

27	Name: ChandraSRK Organisation: N/A Comment ID #: LITD_2024-03-039446	N/A Table A.1		Editorial	Table A.1 — Control objectives and controls to cover additional entry for Design and development Plan, Quality Plan , Risk Management, data management, ai communication plan for AI based system	following control objectives to be added wrt AI System: - Design and development Plan - Quality Plan - Risk Management Plan - data management plan - Communication plan	These are covered under A.6 , A.7 and A.8. In view of this no change is required.	Discuss	ChandraSRK	to be discussed
28	Name: ChandraSRK Organisation: N/A Comment ID #: LITD_2024-03-048775	N/A B.2.2		General	B.2.2 AI policy Implementation guidance, need to cover which role responsible for AI Policy, such as role approved by management should be responsible for the development, review and evaluation of the AI policy, or the components within. However similar info available in B.2.4 Review of the AI policy	A role approved by management should be responsible for the development, review and evaluation of the AI policy, or the components within.	B.2.4 is also covering the aspect of development of AI policy so there is no need to mention this both at B.2.2 and B.2.4.In view of this no change is required.	Discuss	ChandraSRK	Implementation guidance to cover about roles, responsible, actviitiy. It is covered in B2.4, however it is suggested to cover in section B2.2
29	Name: ChandraSRK Organisation: N/A Comment ID #: LITD_2024-03-046586	N/A B.4.3		General	B.4.3 Data resources Data privacy, data approval authority, version or some identifying tag that from previous versions to be added under list: Documentation on data should include, but is not limited to, the following topics:	Data privacy, data approval authority, version or some identifying tag that from previous versions	This list is not exhaustive. These aspects are covered under data quality. In view of this no change is required.	Discuss	ChandraSRK	
30	Name: Sundar Narayanan	N/A B.5.3		General	AI impact assessment documentation shall include the risk criteria (including the relevance, severity, likelihood and detectability)	AI impact assessment documentation shall include the risk criteria (including the relevance, severity, likelihood and detectability)	Other information is referring to risk management. In view of this no change is required.		Sundar Narayanan	

31	Name: Sundar Narayanan	N/A B. 5.4		General	B.5.4 Assessing AI system impact on individuals or groups of individuals needs to take into account the impact of AI system on individuals, groups, nation state and humanity as a whole. The nation state implications are not clearly articulated. For instance, Facebook impact on elections is a community and nation state issue.	When assessing the impacts on individuals or groups of individuals, or both, the organization should consider the impact of AI systems on nation-state and humanity as a whole.	May be discussed and accordingly can be taken up at ISO/IEC level.		Sundar Narayanan	
32	Name: ChandraSRK Organisation: N/A Comment ID #: LITD_2024-03-045855	N/A B. 5.4		General	B.5.4 Assessing AI system impact on individuals or groups of individuals Implementation guidance When assessing the impacts on individuals or groups of individuals, or both, and societies, the organization should consider its governance principles, AI policies and objectives.	When assessing the impacts on individuals or groups of individuals, or both, the organization should consider its governance principles, AI policies and objectives.	What is the rational for removal of 'societies'. In absence of rational no change is required.	Discuss	ChandraSRK	This is about B.5.4 Assessing AI system impact on individuals or groups of individuals. So 'societies' not required
33	Name: Sundar Narayanan	N/A B. 6.1		General	Responsible AI expectation shall extend to design, development, deployment and decommissioning of AI systems.	To ensure that the organization identifies and documents objectives and implements processes for the responsible design, development, deployment and decommissioning of AI systems.	Life cycle stages have been mentioned as one of the aspects of consideration. Life cycle stages cover these aspects. In view of this no change is required.		Sundar Narayanan	

34	Name: Sundar Narayanan	N/A B. 6.2			General	Lifecycle of AI system does not cover the post market monitoring or maintenance of the AI system	The organization should specify and document requirements for new AI systems or material enhancements to existing systems including based on post-market monitoring and maintenance of AI system.	Requirements are not only based on the 'post-market monitoring'. The propose change conveys meaning that requirements are to be based on 'post-market monitoring'. Further, Operation and Monitoring is one the stages of life cycle as per 5338. In view of this no change is required.		Sundar Narayanan	
35	Name: Sundar Narayanan	N/A B. 6.2.3			General	"The organization should document the AI system design and development based on organizational objectives, documented requirements and specification criteria." The guidance does not cover the need for documenting the limitations and known vulnerabilities, bias testing scores, privacy impact assessment, user manual, interpretability guidance, and notifications/ alerts to help user understand failure modes.	The guidance shall cover the need for documenting the limitations and known vulnerabilities, bias testing scores, privacy impact assessment, user manual, interpretability guidance, and notifications/ alerts to help user understand failure modes.	This list is not exhaustive. These aspects are covered under 'evaluation and refinement of models'. In view of this no change is required.		Sundar Narayanan	

| 36 | Name: ChandraSRK Organisation: N/A Comment ID #: LITD_2024-03-047959 | N/A A | | General | following new control can be added: Human Resources for AI Management System to establish, implement, maintain AI QMS, Audit | following new control can be added: Human Resources for AI Management System to establish, implement, maintain AI QMS, Audit | What is the rational for addition of new control. What is AI QMS and how it would be different from AIMS. In absence of rational no change is required. | Discuss | ChandraSRK | Please QMS as MS . Need clarification on How Quality of AI system is achieved resources need to establish, maintain, implement AI MS as well as For auditing |

| 37 | Name: ChandraSRK
Organisation: N/A
Comment ID #: LITD_2024-03-048285 | N/A | A, B | | General | B.6.2.3 Documentation of AI system design and development
Control
The organization should document the AI system design and development based on organizational objectives, documented requirements and specification criteria.
B.6.2.3 Documentation of AI system design and development
Control
The organization should document the AI system design and development based on organizational objectives, documented requirements and architecture.
even these to be split into to two separate controls
for each life cycle stage separate control is required to ensure stage specific measures
for ex. AI system requirements and specification to be splitted into AI system requirements, AI system Architecture
Needs following clarification(s)
1. AI Policy for specific system may be different from organization AI policy.
Note: This is not specified in AI MSS
2.Stakeholders of AIMS vs AI system need to bring in more clarity | AI system requirements
AI system Architecture | | Discuss | ChandraSRK | to be discussed |

| 38 | | | | | ISO 42001:2023, is tabled as comprehensive governance model for AI, relies heavily on entities that may not fully grasp the nuances and complexities of the digital realm. Typically these entities are either in code development or management neither of which understand the complexities of the other. In an era where AI algorithms are constantly pushing boundaries, the question arises: Can a set of non-automated control standards truly keep pace with the dynamic and ever-evolving nature of artificial intelligence? | Align or include , need of automated controls / standards , or interdependencies / Relationships , to truly keep pace with the dynamic and ever-evolving nature of artificial intelligence. | What is the meaning of 'automated controls/standards'? There is no specific proposed change along with content. In view of this no change is required. | | Madhav Chablani | |
| | Name: Madhav Chablani Organisation: CSA - India | All clauses N/A | All clauses | General | | | | | | |

39					Standard's static nature and rigid non-automated framework may hinder innovation rather than fostering it. AI, by its very nature, thrives on adaptability and learning from data, making it challenging to regulate with a fixed set of rules, designed to be controlled by a "governance committee" that doesn't understand it.	It's essential to include governance committee's competence KPI and competencies charter also , and reviewed continuously . As part of resource identification, the organization should document information about the human resources and their competences utilized for Governance Committee entities also , for the organization enabled with AI systems or components.	Standards are not for hindering innovation. May be discussed.		Madhav Chablani	
	Name: Madhav Chablani Organisation: CSA - India	B 4.6 and C2.2		General						
40					There is inability to bridge the governance gap between traditional industries and the AI-driven future. The standard appears to be a product of conventional thinking, lacking the agility required to regulate an industry that constantly pushes technological boundaries. The Standard relies heavily on people driven governance model that has not been very automated or technically forward thinking .	Align model governance , that has to be automated or technically forward thinking .	Please provide specific changes or proposal for development of new standard along with draft.		Madhav Chablani	
	Name: Madhav Chablani Organisation: CSA - India	All clauses N/A	All clauses	General						

41					While the intention behind ISO 42001: 2023 is to ensure responsible and ethical AI development, there are concerns that the nature of the standard may lead to unintended consequences.	Stricter regulations might stifle innovation, creating a conservative environment that hampers the very progress it aims to guide.	Standards are not for hindering innovation. Please provide specific changes or proposal for development of new standard along with draft. There is no specific proposed change so in view of this no change is required.		Madhav Chablani	
	Name: Madhav Chablani Organisation: CSA - India	All clauses N/A	All clauses	General						
42					AI regulation should mirror the adaptive nature of the technology itself.	It's proposed continuous, data-driven assessments and real-time updates to standards, rather than a static set of rules that may quickly become obsolete in the fast-paced world of AI development.	This is standard not a regulation. Please provide specific changes or proposal for development of new standard along with draft. There is no specific proposed change so in view of this no change is required.		Madhav Chablani	
	Name: Madhav Chablani Organisation: CSA - India	All clauses N/A	All clauses	General						

43					ISO/IEC 42001:2023's attempt to control AI through a governance model raises pertinent questions about its effectiveness and adaptability.	While the pursuit of ethical AI is crucial, rather, a more dynamic and digitally native approach is needed to keep pace with the relentless advancements in artificial intelligence. The controversy surrounding ISO 42001: 2023 underscores the broader debate about striking the right balance between regulation and innovation in the ever-evolving landscape of AI.	This is standard not a regulation. Please provide specific changes or proposal for development of new standard along with draft. There is no specific proposed change so in view of this no change is required.		Madhav Chablani	
	Name: Madhav Chablani Organisation: CSA - India	All clauses N/A	All clauses	General						
44					Though these are referenced -ISO 9241-210 , ISO/IEC 25024 , ISO/IEC 19944-1 & ISO/IEC 5259 series , but not brought in normative reference	It's important to include these standards in normative reference and along with others standards , as in exclusivity , this standard may not be sufficient .	Please refer 27001 and other related management system standards. Other series of standards are not referred as normative references. In view of this no change is required.		Madhav Chablani	
	Name: Madhav Chablani Organisation: CSA - India	D.2	All clauses	General						

Additional inputs from other Members

1	Name: Mr Madhav Chablani Organization: Cloud Security Alliance - NCR (India)				Agree , to adopt ISO/IEC 42001:2023 as it is as Indian standard. Changes,if any agreed by LITD 30 may be taken up at ISO/IEC JTC 1/SC 42 for appropriate revision/amendment.		
2	Name: Mr. Raghavendra S Bhat organization: Intel India Technology Private Limited				I agree with your disposition of the comments. No further inputs from me.		