



**Computer & Communications
Industry Association**
Tech Advocacy Since 1972

Ms. Margrethe Vestager
Executive Vice-President, Europe fit for the Digital Age, European Commission

Mr. Valdis Dombrovskis
Executive Vice-President, An Economy that Works for People, European Commission

Ms. Věra Jourová
Vice President, Values and Transparency, European Commission

Mr. Thierry Breton
Commissioner, Internal Market, European Commission

Ms. Mariya Gabriel
Commissioner, Innovation, Research, Culture, Education and Youth, European Commission

Ms. Ylva Johansson
Commissioner, Home Affairs, European Commission

Mr. Didier Reynders
Commissioner, Justice, European Commission

Sent by email

Brussels, 31st March 2021

Dear Executive Vice-Presidents, Vice-President, Commissioners,

The Computer & Communications Industry Association (CCIA Europe) looks forward to the European Commission's forthcoming legislative proposal on trustworthy Artificial Intelligence (AI). We welcome the Commission's dual emphasis on building European excellence and trust in AI. Your efforts are crucial in ensuring that AI can support Europe's economic recovery, green and digital transitions, and help Europeans, e.g. through improved healthcare.

In anticipation of your forthcoming AI proposal please allow us to share our recommendations:

- A proportionate and risk-based EU approach can maximise the benefits of AI, while also mitigating risks.
- New legal requirements should focus on a narrowly defined set of so-called 'high-risk' AI applications. Determinations of what constitutes high-risk AI applications should focus on specific use cases rather than blanket technology categories and not conflict with planned or pending regulations that are already being developed to ensure safety and trustworthiness.



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- We recognise the importance of having a robust system in place to ensure companies are held responsible for testing their products before they are introduced into the EU market. However, we caution against imposing conformity assessment requirements, which would delay bringing AI innovations to the EU market and encourage European innovators to launch elsewhere.
- We are encouraged by the EU's efforts to build international alliances with like-minded partners. We support the European Commission's ambition to find convergence between the EU and the U.S. approach on the governance of AI and other emerging technologies.
- On the review of EU liability rules in the context of AI expected later this year, we would caution against any sweeping changes to the long-standing European liability framework that has proved to be both effective and technology-neutral.

We hope our recommendations will be useful to you and we stand ready to provide further information.

Best regards,

A handwritten signature in black ink, appearing to read 'Christian Borggreen', written in a cursive style.

Christian Borggreen
Vice President & Head of Office
Computer & Communications Industry Association (CCIA Europe)
cborggreen@ccianet.org

The Computer & Communications Industry Association is an international, nonprofit association representing a broad cross section of computer, communications and Internet industry firms. CCIA remains dedicated, as it has for over 45 years, to promoting innovation and preserving full, fair and open competition throughout our industry. Our members employ more than 750,000 workers.