

February 12, 2026

The Honorable Howard Lutnick  
Secretary, United States Department of Commerce  
1401 Constitution Avenue NW  
Washington, D.C. 20230

*Re: Leveraging the NIST AI Risk Management Framework to Spur Global AI Adoption*

Dear Secretary Lutnick:

We write on behalf of a broad, cross-sectoral coalition of US industry associations, representing companies across varied industries that provide significant economic benefits to the US economy, ranging from technology and consumer electronics companies to providers of health and financial services.

We applaud the significant efforts that the Department of Commerce has taken to spur AI adoption. We also appreciate the opportunity to highlight a key mechanism enabling this adoption: the National Institute of Standards and Technology's (NIST) AI Risk Management Framework (RMF). During President Trump's first term, Congress passed the National Artificial Intelligence Initiative Act of 2020, which directed NIST to create the RMF. This framework, a testament to the Department of Commerce and, in particular, NIST, is now a widely recognized approach to AI governance that companies are leveraging to advance continued American AI leadership. As discussed further below, we believe the Department of Commerce can preserve the core tenets of the RMF, while ensuring the framework aligns with this Administration's priorities and the goals articulated in the President's AI Action Plan.

The benefits the RMF provides are immense, and it has rapidly become the cornerstone of trustworthy AI development for several reasons. First, it serves as an essential "common language" for the entire industry. It allows complex, global organizations to communicate across internal cross-functional teams and to external stakeholders, such as customers or regulators, on precisely how they have implemented robust, trustworthy, and secure AI systems.

Second, its continued strength rests in its voluntary, non-prescriptive, and risk-based foundation, a methodology that is critical to companies' ability to maintain agility necessary to innovate and secure the United States' advantage in an increasingly competitive global marketplace.

Third, the RMF is uniquely suited to drive global interoperability. Its risk-based approach, which focuses on use cases and outcomes, provides the consistency and necessary flexibility to thrive across different jurisdictions, both across the United States and around the world. This approach is essential to avoid regulatory fragmentation and ensure that innovation flourishes across the entire AI value chain.

Fourth, the RMF serves as a crucial mechanism for demonstrating effective governance practices across industry sectors, helping companies more readily adopt AI solutions that meet recognized governance frameworks.

In light of these benefits, the RMF is the ideal vehicle to help execute the Administration's priorities, particularly the goals outlined in the AI Action Plan to accelerate innovation and reduce unnecessary regulatory barriers. It also serves as a critical asset for achieving Pillar 3: "Lead in international AI diplomacy and security." Expanding the reach and utilization of the NIST AI Framework would bolster the competitiveness of the US technology sector in foreign markets and strengthen US AI leadership and innovation globally, supporting the Department of Commerce's other efforts to advance this goal, including the American AI Export Program.

Member companies across our organizations have invested billions of dollars integrating the RMF's core functions into their enterprise governance, confirming its status as the irreplaceable operational governance framework for trustworthy AI. This level of deep operational integration reflects how the RMF has become the established foundation for effective AI governance across industry sectors. As the Office of Management and Budget acknowledged earlier this year in its M-25-21 memo on government use of AI, "[e]ffective AI governance is key to accelerated innovation."

As the Department of Commerce prepares to make targeted modifications to the RMF to align with the Administration's AI agenda, we urge you to preserve the framework's core structure and functions. The RMF works because it is robust, flexible, voluntary, and risk-based. We look forward to continuing to collaborate with NIST so the updated RMF builds on these strengths and remains a valuable tool to companies that have invested heavily in implementing it.

Continuity, flexibility, and interoperability are essential to the RMF's success. They allow companies to lead through innovation rather than rigid compliance requirements and to compete in both US and global markets.

We appreciate the Department of Commerce's commitment to a pro-innovation, risk-based approach to AI. We look forward to partnering with you to help secure America's future as the global leader in AI.

Sincerely,

Alliance for Automotive Innovation



Alliance for Digital Innovation



American Bankers Association



Business Software Alliance



Consumer Technology Association



CTIA



Information Technology Industry Council



ncta The Internet & Television Association



Software & Information Industry Association



TechNet

