May 17, 2024

The Honorable Mitt Romney
United States Senate
Washington, D.C. 20510

The Honorable Jack Reed
United States Senate
Washington, D.C. 20510

The Honorable Jerry Moran
United States Senate
Washington, D.C. 20510

The Honorable Angus King
United States Senate
Washington, D.C. 20510

Re: Proposed Framework to Mitigate Extreme AI Risks

Dear Senators Romney, Reed, Moran, and King,

The AdvaMed Medical Imaging Division represents the manufacturers of medical imaging equipment, including, magnetic resonance imaging (MRI), medical X-Ray equipment, computed tomography (CT) scanners, ultrasound, nuclear imaging, radiopharmaceuticals, and imaging information systems. Our members have introduced innovative medical imaging technologies for use by healthcare providers, and they play an essential role in our nation's health care infrastructure and the care pathways of screening, staging, evaluating, managing, and effectively treating patients with cancer, heart disease, neurological degeneration, COVID-19, and numerous other medical conditions.

We support the framework you have proposed to mitigate risks posed by future developments in advanced AI models, and we commend your proactive approach in addressing the potential national security implications of advanced AI while ensuring that the domestic AI industry can continue to innovate and maintain a competitive edge in the international market.

We also support that the proposed framework is limited in scope to frontier models, which are defined as the most advanced AI models. By focusing on these cutting-edge AI systems, the framework acknowledges the unique challenges and risks associated with their development and deployment while targeting the approach

for effective oversight without unnecessarily burdening the broader AI industry, including within the medical device sector, which relies on other types of AI models to improve patient care and outcomes.

As you continue to refine and discuss this framework, we encourage you to maintain the clear differentiation between frontier AI models and other forms of AI that are currently in use. The medical device industry has long been utilizing AI and machine learning technologies to enhance the accuracy, efficiency, and safety of our products. These applications, while innovative and impactful, do not pose the same level of risk as the frontier models addressed in your framework. By preserving this distinction, you can ensure that any future regulations or oversight mechanisms are appropriately tailored to the specific challenges posed by frontier AI models without hindering the ongoing development and deployment of AI in other sectors, such as healthcare.

The medical device industry is deeply invested in the responsible development and use of AI technologies. We recognize the immense potential of AI to revolutionize healthcare and improve patient outcomes, but we also understand the importance of addressing potential risks and ethical concerns. As such, we are keen to engage with policymakers, experts, and other stakeholders to shape the future of AI governance and regulation.

We appreciate the opportunity to provide feedback on this framework and look forward to further engagement on this critical issue. The medical device industry stands ready to collaborate with Congress and other stakeholders to ensure that the development and deployment of AI, including frontier models, are guided by principles of safety, security, and ethics.

Thank you for your leadership in addressing the challenges and opportunities presented by advanced AI models. We look forward to working with you to foster a responsible and innovative AI ecosystem. If you have any questions, please contact me at zhornberger@advamed.org or by phone at 202-434-7263.

Sincerely,

Zack Hornberger
Senior Director, *Digital Health & Imaging Technology*
AdvaMed Medical Imaging Division

Rachel Kosh
Director, *Federal Government Affairs*
AdvaMed Medical Imaging Division