

Template for comments and secretariat observations

Date: 15 July 2026	Document: DIS 21520	Project:
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MB/ NC ¹	Line number (e.g. 17)	Clause/ Subclause (e.g. 3.1)	Paragraph/ Figure/ Table/ (e.g. Table 1)	Type of comment ²	Comments	Proposed change	Observations of the secretariat
US		3.2		te	The definition establishes organizational structure but does not establish the decision-authority threshold that distinguishes governance from oversight, management, Responsible AI controls, or human participation. Clause 3.2 cites no source vocabulary, unlike the neighboring entries in Clause 3, which adopt definitions from ISO/IEC 22989:2022 or ISO/IEC 2382:2015. Regulation has moved toward the same threshold on its own terms. New York's Part 161, effective June 1, 2026, governs the use of AI in court papers while requiring the filer to review the paper and independently verify its contents. Regulation (EU) 2026/1744 deferred the EU AI Act's high-risk obligations, including Article 14 human oversight, to December 2, 2027 for Annex III systems, without removing them. Supporting memo, operational scope, and development record: https://basilpuglisi.com/iso-21520-ai-governance-comment/	Revise Clause 3.2 so that the definition of artificial intelligence governance expressly identifies binding human decision authority and attributable human accountability as elements that distinguish governance from organizational process, oversight, and Responsible AI controls. Proposed language (applied): AI Governance exists when a qualified human holds binding authority at specific checkpoints, with personal accountability for the outputs that pass through. Proposed language (full scope): AI Governance is the system of decision authority, accountability structures, and oversight mechanisms through which named humans hold binding power to accept, modify, or reject AI outputs at defined checkpoints, with authority that cannot be delegated to the AI system being governed and accountability that survives audit through moral, professional, civil, and criminal channels.	While the U.S. TAG appreciates this proposed change, it is not possible to accept it. The proposed change is that AI governance exists only when a qualified or named human holds binding authority. While such human control is desirable, that control is not always required for AI governance to exist. Accordingly, it is not believed advisable to propose expanding the definition with such additional expectations and still have the definition and document be universally applicable. Definitions in ISO standards tend to be intentionally high level and concise to be broadly and globally applicable. Additional detail, particularly operational or implementation related, can be incorporated by users of the document as such specifics typically fit

¹ **MB** = Member body / **NC** = National Committee (enter the ISO 3166 two-letter country code, e.g. CN for China; comments from the ISO/CS editing unit are identified by **)

² **Type of comment:** **ge** = general **te** = technical **ed** = editorial

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							within the catch-all definition. Additionally, the proposed definition could be considered to contain one or more requirements, which are not permitted by ISO in definitions. The TAG thanks the commenter for his input.
US		3.1		ed	Clause 3.1 refers to “AI systems (3.2),” but the AI system definition appears at 3.4.	Change the cross-reference to (3.4).	Accept.
US		3.4	Note 1 to entry	ed	Clause 3.4 defines an “engineering system,” while its Note 1 refers to “the engineered system.” The source, ISO/IEC 22989:2022, 3.1.4, uses “engineered” in both places.	Change “engineering” to “engineered” to be consistent with the source.	Accept.

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