

Request for Information (RFI) on Advancing Privacy Enhancing Technologies

Inpher

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RFI Response: Privacy-Enhancing Technologies

To Whom It May Concern,

We applaud the NITRD initiative and thank you for the opportunity to provide a response to the RFI on Privacy-Enhancing Technologies (PETs). Inpher is a software vendor providing PETs capabilities to industry and government agencies, including our work with In-Q-Tel and the Intelligence Community (see [Inpher Announces Strategic Partnership with In-Q-Tel](#).)

Inpher is committed to the advancement of PETs adoption to increase American competitiveness in data analytics and AI while preserving privacy, individual liberties and democratic values. We have submitted public statements and recommendations advocating for responsible innovation through PETs to eight US Government offices, committees and agencies since 2019, including expert testimony to the U.S. House Financial Services Committee AI Taskforce. The full records can be found on the [Privacy Advocacy and Public Policy](#) page on our website.

Below we have categorized these statements and recommendations to the US and related international governing bodies with additional reference materials according to the RFI Topics list provided.

1. Specific research opportunities to advance PETs:
 - a. U.S. Office of Management and Budget (OMB)
 - i. Inpher public comment: [Identifying Priority Access or Quality Improvements for Federal data and models for Artificial Intelligence Research and Development \(R&D\), and Testing](#)

- b. National Institute of Standards and Technology (NIST)
 - i. Inpher public comment: [Inpher NIST Draft Privacy Framework 1.0 Consultation](#)
2. Specific technical aspects or limitations of PETs:
 - a. [Privacy challenges in extreme gradient boosting](#)
 - b. [Classifying the challenges of privacy-enhancing technologies in IOT data markets](#)
3. Specific sectors, applications, or types of analysis that would particularly benefit from the adoption of PETs:
 - a. U.S. Senate Commerce Committee, Congressional hearing “Enlisting Big Data in the Fight Against Coronavirus”
 - i. Inpher public comment: [Using Privacy-Enhancing Technologies to ‘Enlist Big Data in the Fight Against Coronavirus’](#)
 - b. [Reimagining Fraud Detection through Collaborative Multi-Party GPU Computing](#)
 - c. [Better ESG Benchmarking with Secret Computing](#)
 - d. [Neuroimaging Based Diagnosis of Alzheimer’s Disease Using Privacy-Preserving Machine Learning](#)
 - e. [Flying Fuzzy: A Privacy Preserved No-Fly List for Global Airlines Using Fuzzy String Matching](#)
4. Specific regulations or authorities that could be used, modified, or introduced to advance PETs:
 - a. Financial Crimes Enforcement Network (FinCEN), U.S. Department of the Treasury
 - i. Inpher public comment: [Advance Notice of Proposed Rulemaking \(ANPRM\) on ‘Anti-Money Laundering Program Effectiveness’](#)
 - b. U.S. Federal Trade Commission (FTC), Amendments to Safeguards Rule (16 CFR Part 314) Project No. P145407
 - i. Inpher public comment: [Standards for Safeguarding Customer Information in the Gramm–Leach–Bliley Act \(GLBA\)](#)
 - c. U.S. Bureau of Consumer Financial Protection (CFPB) Request for Information Regarding Tech Sprints
 - i. Inpher public comment: [Supervised FinTech sandboxes can promote trust in privacy-enhancing technologies](#)
 - d. [A Call to Action: The Regulator’s Role in Supporting Privacy-Enhancing Technologies for Data-Driven Financial Crime Investigations](#)
5. Specific laws that could be used, modified, or introduced to advance PETs:
 - a. U.S. House Financial Services Committee, AI Taskforce

- i. Inpher expert testimony: [AI and the Evolution of Cloud Computing: Evaluating How Financial Data is Stored, Protected, and Maintained by Cloud Providers](#)
 - b. European Data Protection Board (EDPB)
 - i. Inpher public comment: [Recommendations 01/2020 on measures that supplement transfer tools to ensure compliance with the EU level of protection of personal data](#)
 - c. [EU and U.S. Policymakers Emphasize Privacy-Enhancing Technologies as a Shared Priority in 2021](#)
 - d. Office of the Privacy Commissioner of Canada (OPC)
 - i. Inpher public comment: [Consultation on Transfers for Processing](#)
- 6. Specific mechanisms, not covered above, that could be used, modified, or introduced to advance PETs:
 - a. UK Information Commissioner's Office (ICO)
 - i. Inpher public comment: [ICO Consultation on the Draft Data Sharing Code of Practice](#)
- 7. Risks related to PETs adoption:
 - a. [The Privacy Risk Right Under Our Nose in Federated Learning](#)
 - b. [Risks of Privacy-Enhancing Technologies: Complexity and Implications of Differential Privacy in the Context of Cybercrime](#)
- 8. Existing best practices that are helpful for PETs adoption:
 - a. [How DataCo is Reinventing Data Partnerships by Putting Privacy-Enhancing Technologies to Work](#)

We sincerely hope that this information will aid in the development of a national PETs strategy and we remain at your service to answer any questions or participate in upcoming workshops.

Sincerely,

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