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8 April 2026

Mr. Nima Amirifar Account Manager CEN-CENELEC Management Centre Rue de la Science 23 1040 Brussels, Belgium

CC: JTC 21 Secretariat, Danish Standards (jtc21@ds.dk)

Re: Application for Liaison Organization Status — CEN/CENELEC JTC 21 (Artificial Intelligence)

Dear Mr. Amirifar,

The Box Commons hereby applies for Liaison Organization status with CEN/CENELEC Joint Technical Committee 21 (Artificial Intelligence), in accordance with the procedures set forth in CEN-CENELEC Guide 25.

We write to JTC 21 at a moment when the standards community faces a coordination problem with real consequences. The EU AI Act requires harmonized standards under tight timelines. Simultaneously, the United States is developing parallel credentialing and risk management frameworks through NIST, state legislatures, and federal regulators. Without structured transatlantic coordination at the technical committee level, these regimes risk divergence — creating compliance fragmentation that burdens industry, weakens enforcement, and ultimately delays the shared goal of trustworthy AI deployment. The Box Commons exists to help close that gap.

About The Box Commons

The Box Commons is a 501(c)(6) mutual benefit nonprofit corporation incorporated in Wyoming, United States (EIN 41-5252306). Our mission is the development, maintenance, and administration of technology-agnostic credentialing standards for AI systems — specifically, standards that certify observable behaviors and measurable outcomes rather than mandating specific technologies or architectures.

Governance. We operate a three-chamber governance structure modeled on the Forest Stewardship Council: Industry, Civil Society, and Academic/Research chambers hold equal voting weight (one-third each). No single stakeholder category can dominate the standards process. This structure satisfies the balance and lack-of-dominance requirements of both the ANSI Essential Requirements and the principles underlying CEN-CENELEC internal regulations on stakeholder participation.

Standards development process. Our process follows established consensus procedures: New Work Item Proposals, chartered working groups with cross-chamber representation, 60-day public comment periods with written dispositions, two-of-three chamber adoption votes, mandatory three-year sunset reviews, and a formal appeals mechanism.

Certification model. The Box Commons accredits third-party certifiers and maintains standards — it does not certify AI systems directly. This separation of standards-setting from certification mirrors the structural approach of ISO/IEC 17065 and prevents financial conflicts of interest in certification outcomes.

First credential issued. BC-AAOC-2026-001, the Autonomous Agent Operational Credential, establishes baseline behavioral and operational requirements for AI agents acting with delegated

authority. The credential framework maps directly to NIST AI RMF functions (Govern, Map, Measure, Manage).

Strategic Rationale for Liaison Status

JTC 21 is operating under accelerated procedures to deliver harmonized standards supporting the EU AI Act — notably prEN 18285 (Conformity Assessment) and prEN 18286 (AI Quality Management System), both targeting Q4 2026 adoption. The Box Commons offers JTC 21 three specific forms of value as a liaison organization.

1. US regulatory intelligence. The Box Commons maintains active engagement across the US AI regulatory landscape. We have submitted formal public comments to the National Institute of Standards and Technology (NIST AI 800-2, acknowledged March 2026 by the Chief AI Standards and International Coordination office), the California Privacy Protection Agency, the Federal Reserve, the FAR Council, the National Association of Insurance Commissioners, and Singapore's Infocomm Media Development Authority. We are engaged with Virginia's Joint Commission on Technology and Science regarding the state's Independent Verification Organization framework (HB 797). This engagement provides JTC 21 working groups with current, first-hand reporting on how US regulators are approaching AI conformity assessment, risk classification, and operational requirements — information directly relevant to achieving transatlantic interoperability in harmonized standards.

2. Conformity assessment alignment. The Box Commons credentialing framework was designed from inception for compatibility with ISO/IEC 17065, ISO/IEC 42001, and the NIST AI RMF. Our three-chamber governance, RF patent default, and third-party certifier accreditation model are structurally aligned with the conformity assessment architecture anticipated in prEN 18285. As a liaison organization, we would contribute operational experience from implementing these frameworks in a US regulatory context — identifying where transatlantic alignment is achievable and where substantive differences require explicit mapping.

3. Bidirectional standards adoption. European harmonized standards gain global influence when they are practically implementable outside the EU. A US-based liaison organization with direct regulatory engagement provides JTC 21 with a feedback channel on the extraterritorial implementability of its standards — whether requirements translate across jurisdictions, where terminology diverges, and where mutual recognition pathways are feasible. This is not theoretical: US organizations including UL Solutions, ASME, and ASTM International already serve as liaison organizations to CEN/CENELEC technical committees, demonstrating that transatlantic liaison participation is both procedurally established and substantively productive.

Specific Areas of Contribution

The Box Commons would seek to contribute to the following JTC 21 working groups:

Working Group 4 — AI Management System. The Box Commons governance framework and standards development process directly address AI management system requirements. Our NIST AI RMF alignment work — mapping credentialing modules to the Govern, Map, Measure, and Manage functions — provides a tested US implementation perspective relevant to prEN 18286 drafting. We would contribute technical input on how management system requirements interact

with US regulatory expectations, particularly where NIST AI RMF subcategories map to (or diverge from) the management system clauses under development.

Working Group 5 — Conformity Assessment. This is our primary area of expertise. The Box Commons exists to build conformity assessment infrastructure for AI systems. Our third-party certifier accreditation model, credential registry design, and modular certification architecture (domain-specific modules rather than monolithic certification) offer practical implementation evidence for prEN 18285 drafting. We would contribute experience on certifier independence requirements, audit methodology design, and the structural separation of standards-setting from certification — issues that directly affect the credibility and market acceptance of any conformity assessment standard.

We would also monitor developments across all five working groups and provide written technical contributions where our expertise is relevant.

Governance and IP Compliance

IP policy. The Box Commons operates under a Royalty-Free (RF) default for all contributions to standards. Contributors grant worldwide, irrevocable, non-exclusive, royalty-free licenses to essential patent claims embodied in their contributions. This policy exceeds the minimum requirements of the CEN-CENELEC Common Policy on Patents (CEN-CENELEC Guide 8) and is fully compatible with the FRAND framework used in European standardization. We are prepared to execute any additional IP undertakings required by JTC 21.

Stakeholder consensus. The three-chamber governance structure ensures that all technical contributions from The Box Commons to JTC 21 represent balanced stakeholder input — not the position of any single company or interest group. This meets the requirement under Guide 25 that liaison organizations ensure their inputs reflect stakeholder consensus.

Confidentiality. The Box Commons will adhere to CEN-CENELEC rules on the handling of working documents, including restrictions on distribution of committee drafts prior to public enquiry.

Annual fee. The Box Commons is prepared to pay the annual liaison fee as set by the CEN and CENELEC General Assemblies.

Supporting Materials

We are prepared to provide the following documentation upon request or as part of the formal application dossier:

1. Box Commons Governance Framework (three-chamber model, independence requirements, anti-capture mechanisms, standards development process)
2. Articles of Incorporation (filed April 1, 2026, Wyoming Secretary of State)
3. Patent and IP Policy (RF default, Empty Set LLC patent pledge, technology-agnosticism provisions)
4. NIST AI 800-2 public comment submission and CAISI acknowledgment correspondence
5. BC-AAOC-2026-001 credential specification and NIST AI RMF alignment mapping

6. Summary of US regulatory comment submissions (NIST, CPPA, Federal Reserve, FAR Council, NAIC, Singapore IMDA)
7. Board landscape analysis and governance independence requirements

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Next Steps

We request guidance on the formal application procedure, including any required documentation beyond what is described above, the timeline for consideration by the JTC 21 Technical Board, and the applicable annual fee schedule.

If it would be useful, we are available to present The Box Commons and its relevance to JTC 21's work programme to the Technical Board or to the JTC 21 Chair at a convenient meeting.

For all correspondence regarding this application, please contact:

Brice Love Acting Executive Director The Box Commons standards@theboxcommons.org theboxcommons.org

Respectfully,

Brice Love Acting Executive Director The Box Commons