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Secretary Howard Lutnick
U.S. Department of Commerce
1401 Constitution Avenue, N.W.
Washington, D.C. 20230

Dear Secretary Lutnick,

The rapid deployment of artificial intelligence (AI) agents across the digital ecosystem is demonstrating the need for standardized approaches to web access that can foster trust, interoperability, and security. TechNet strongly supports the AI Agent Standards Initiative and appreciated the opportunity to provide detailed feedback in response to the Center for AI Standards and Innovation's (CAISI) RFI on AI agent security. We encourage the Department of Commerce, through the National Institute of Standards and Technology (NIST) and in partnership with the White House Office of Science and Technology Policy (OSTP), to organize a workshop that will continue this effort and bring together stakeholders including AI developers, web publishers (first-party and platforms), and the infrastructure intermediaries that sit between them. The outcome of such a workshop would inform the development of consensus-based standards for how AI agents identify themselves and describe their activities as they navigate the web.

Identifying the core requirements and objectives that any future technical standard should satisfy will foster the development of frameworks and best practices that ensure the U.S. remains a leader in standards used around the globe. These discussions should also address the trust framework needed to support agentic interactions, enabling websites to make informed, risk-based decisions about AI agent access. The resulting stakeholder consensus can then inform and accelerate work already underway in a number of standards bodies, such as the Internet Engineering Task Force (IETF), Linux Foundation, FIDO Alliance, and World Wide Web Consortium (W3C), to ensure that technical specifications reflect broad ecosystem agreement rather than the priorities of any single company or infrastructure intermediary. Developing such a consensus is consistent with the goals of NIST's AI Agent Standards Initiative, which is explicitly intended to foster industry-led standards, and its National Cybersecurity Center of Excellence (NCCoE) project on *Accelerating the Adoption of Software and AI Agent Identity and Authorization* that is focused on addressing similar issues within business-to-business (B2B) and enterprise systems.

Ongoing engagement during standards development will help strengthen U.S. private sector and government alignment of priority issues. We further encourage you to urge

individual private-sector stakeholders to avoid implementing conflicting approaches while a common baseline is being developed.

The window to act is short. Some infrastructure intermediaries are already beginning to enforce unique AI agent classifications and to block AI agent interactions by default. If AI developers, website operators, identity verification and trust/fraud-prevention providers, and other stakeholders adopt different approaches in the absence of consensus standards, we risk fragmentation, reduced interoperability, higher switching costs for businesses, and slower AI deployment. Standards developed through open, consensus-based processes can instead establish a shared foundation that enables websites to make calibrated, risk-based decisions about how AI agents interact with their services rather than relying on fragmented heuristics or binary allow/block decisions. This approach would support broad innovation while giving websites meaningful control over agent interactions in a manner that is secure, interoperable, and scalable.

Absent such coordination, the ecosystem faces several important risks:

Rules set without web publishers' and AI developers' input risk harming both. A poorly designed approach could leave websites without controls sufficient to grant the kinds of access they want, closing off innovative AI-web interfaces before they can emerge. Industry has also raised concerns that company-specific technical requirements or commercial terms could become de facto standards, increasing compliance costs, reducing interoperability, and limiting competition across the ecosystem.

Disproportionate disclosures become a competitive disadvantage for American AI. If American AI products that identify themselves and describe their activities are default-blocked, users may turn to alternatives willing to circumvent those blocks. As standards are developed, it will be important to ensure they are widely used in order to promote transparency without inadvertently placing developers that adopt voluntary identification and authentication mechanisms at a competitive disadvantage relative to anonymous or non-compliant actors.

Fragmentation forecloses the promise of the agentic web. Broadly developed, interoperable standards are more likely to achieve widespread adoption than competing proprietary approaches, which can fragment the ecosystem, increase implementation costs, and hinder interoperability. Without a common foundation, AI agents cannot operate reliably across the web, and the potential of a once-in-a-generation transformative technology could go unrealized.

Agentic web standards must strike a difficult balance: AI agents need a meaningful degree of access to be useful, and websites need real control over how agents interact with their systems, which for some publishers means the ability to defend against unwanted access, and for others means the ability to be reliably discovered and transacted with. The upside of striking that balance is enormous: just as HTTP became

the common foundation on which tens of trillions of dollars of commerce were built, shared agentic standards could do the same for the next era of the web.

We therefore respectfully ask for the Department and OSTP's support to advance standards development for this emerging area, and encourage infrastructure intermediaries to align any near-term efforts with the development of a shared baseline. Done well, this process can give websites meaningful control over, and where they choose meaningful discoverability by, AI agent access while preserving an open, interoperable web. We stand ready to contribute technical expertise to this effort and would welcome the opportunity to brief you or your staff further.

Sincerely,

Linda Moore
President and CEO