Input to the Office of Science and Technology Policy on the statutory definition of “Super Intelligence” under Executive Order 14434

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Assistant to the President for Science and Technology
Office of Science and Technology Policy
Eisenhower Executive Office Building, Washington, DC 20502

Re: Proposed legislative language under section 3 of Executive Order 14434, “Inaugurating the Era of Super Intelligence.” Recommendation that the federal definition carry a verified-stop element

Why this input. Executive Order 14434 directs the Assistant to the President to submit, within 60 days, proposed legislative language establishing a federal definition of “Super Intelligence” and “SI” that reflects the capabilities of frontier systems. A definition that describes what these systems can do should also say what must be true for one to be deployed. The AI Watchdog Alliance recommends one element: that a covered system have a verified stop, defined as an outcome, not a design.

The element in one sentence. “A covered system shall be capable of being stopped by a party other than the system, its operator or its developer, without the system’s cooperation, with that capability exercised on a recurring schedule and documented in a record verifiable by an independent party without access to the operator’s systems.”

Why an outcome, not a mandate. This language names no vendor, no mechanism and no agency. It regulates a drill and a record. Any developer can meet it its own way. It costs a small operator less than an audit, because the record is verifiable offline by anyone with the published tool, so no accredited-verifier bottleneck forms. It takes no position on whether these systems are dangerous; it says that the off switch, which every operator already claims to have, must be one someone else can confirm.

Relationship to the Accord. The Joint Commitment on Frontier Responsibilities signed the same day as the Order asks signers to partner with an independent external auditor or evaluator to confirm that controls are operating as intended. The Commitment does not define “operating as intended” for a stop, or say how an evaluator is kept independent. The verified-stop element supplies both: independence as a property of the record rather than of the evaluator, and a drill cadence that makes the assessment continuous. A statutory definition carrying this element gives the signers a concrete way to meet a commitment they have already made, and gives the public a way to check that they did.

Where the detail lives. KS-1.0, the Verified Stop Standard for Advanced AI Systems, Draft 0.9.3, published by the Alliance for public comment through November 15, 2026, states five testable criteria (authority held outside the system; a stop that needs no cooperation; loss of authority when the system escapes monitoring; restart by a second person; scheduled drills that leave signed, chained records verifiable offline), a sixth for physical machines (an external stop at a disclosed assurance level), a record format, a verifier contract and a mapping to the NIST AI Risk Management Framework and SP 800-53. The same five criteria have been provided to the offices of the sponsor and co-sponsor of the pending federal AI Kill Switch Act and to the State of California’s AI expert group, so that the definition proposed under the Order, the bill, and the state’s work can align rather than compete.

Openness. The standard’s text is licensed under Creative Commons Attribution 4.0 and names no product. Underlying mechanisms developed by the Alliance’s founder’s company are patent pending, with a written commitment that they are available royalty-free to federal, state, local and tribal governments, their contractors, nonprofits and individuals. The Alliance is a nonprofit incorporating in Delaware with an independent-majority board; its founder is affiliated with the patent holder and does not vote on adoption of covered requirements.

Request. That the proposed legislative language include a verified-stop element in the form above or an equivalent outcome, and that the Alliance be included in any consultation on the definition. We can brief staff in thirty minutes at OSTP's convenience.

Enclosed: KS-1.0 Draft 0.9.3; WP-VS-001, "Safety Is Practical for All: A Verified Stop for Advanced AI."

Respectfully submitted,

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