

August 27, 2026

Re: File No. 4-882 — Petition to Mandate AI Governance and Risk Management Disclosure

To the Commission:

Bottom line up front: I founded Orzyn, which builds human-in-the-loop accountability technology for AI. The disclosure I urge is technology-neutral — it will benefit any company or method that meets it, including mine. I put that first on purpose. I have spent a career — in emergency medicine, in biodefense, and in uniform — trained to see a threat before it arrives, sound the alarm, and help build the answer, and on a question this squarely in my lane, staying silent merely to appear neutral would be an abdication of duty, not a display of it. I ask you to weigh what follows on its merits.

I support the petition's central aim — standardized, comparable disclosure of how public companies govern the AI they deploy — and I write to emphasize and provide “teeth” for what matters most: accountability for AI-driven consequential actions.

The Commission's enduring legacy was never certifying which tools were safe. It was requiring honest disclosure and holding identifiable people accountable for conduct. Carrying that principle forward into AI, then the disclosure that matters is not only “what AI does the company use,” but **“when an AI system takes a consequential action, is a real, authorized human accountable for it — in a way the company can prove after the fact?”**

Therefore, I recommend that any AI-governance disclosure framework the Commission develops include, among its governance items, whether and how a registrant ensures verifiable human accountability for high-consequence AI-driven actions — the AI analogue to the internal-control and cybersecurity-incident disclosures already required. It is technology-neutral, holds regardless of which model acted, and it speaks directly to the systemic risk the petition names: that companies are deploying AI with great attention to what it can do and far too little to who answers for what it does.

I offer this from over two decades of work in national-security and public-health risk — federal appointments in biodefense and public health, testimonials before Bipartisan Congress — and from building in this field today. I welcome independent scrutiny of this approach.

Respectfully,

Daniel B. Fagbuyi, MD

Former federal biodefense & public-health appointee, National Biodefense Science Board · pediatric emergency physician · former U.S. Army 101st Airborne Division battalion surgeon · lead author, American Academy of Pediatrics national policy on medical countermeasures for children in public health emergencies, disasters or terrorism · congressional witness (bipartisan)

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