

From: [David Condrey](#)
To: [askchips](#); [pranist](#)
Subject: [EXTERNAL] OMB Control Number 0693-0092 – Public Comment, WritersLogic Inc.
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WritersLogic Inc. submits this comment in response to the notice published at 91 FR 16643 (April 2, 2026) regarding the proposed extension of the ASKCHIPS information collection. WritersLogic is a Service-Disabled Veteran-Owned Small Business (SDVOSB) incorporated in Delaware and headquartered in San Diego, California. We develop Cryptographic Proof of Effort (CPoE), an open protocol for verifiable human authorship attestation, and have previously submitted public comment to NIST in response to the AI Agent Security Request for Information (Docket NIST-2025-0035). We participate in the IETF Remote Attestation Procedures (RATS) Working Group and contribute to the Coalition for Content Provenance and Authenticity (C2PA) specifications.

We have reviewed the published notice and the ASKCHIPS web portal at [askchips.chips.gov](#). The following comments address the four questions presented in Section IV of the notice.

(a) Whether the proposed collection is necessary and has practical utility.

The collection is necessary and has clear practical utility. Consolidating stakeholder meeting and speaker requests into a single structured intake channel reduces friction for both the CHIPS Program Office (CPO) and external parties, and replaces the higher-burden back-and-forth email correspondence the notice acknowledges in Section II. We support continuation of the collection without modification to its underlying purpose.

(b) Accuracy of the burden estimate.

The average estimate of five minutes per response across 250 respondents annually is plausible as a population average, but it likely understates burden for two specific respondent populations. First, first-time respondents must interpret which CHIPS topic categories apply to their interest area before they can complete the form; for an organization without prior CPO engagement, this interpretive step alone can consume the entire allotted five minutes. Second, organizational respondents typically coordinate internally to identify the appropriate point of contact and the authoritative scope of the engagement request before submission; this coordination is a real burden that the estimate does not appear to capture. We recommend NIST either stratify the burden estimate to reflect these populations or publish a brief on-form glossary that allows first-time respondents to complete the form within the stated estimate.

(c) Quality, utility, and clarity of the information collected.

We offer three concrete recommendations.

First, a structured topic taxonomy. If the form currently relies on free-text entry for the CHIPS-related topic of interest, we recommend supplementing or replacing this with a discrete multi-select keyed to the CPO's actual program structure: incentives, research and development (including the National Semiconductor Technology Center and the National Advanced Packaging Manufacturing Program), workforce, and policy and standards. Free-text fields are useful for context but place the burden of categorization on the respondent and

complicate downstream routing and triage.

Second, requester role classification at the point of submission. The Federal Register notice describes the Affected Public as "Business or other for-profit organizations," but the actual respondent universe for a CPO engagement form plausibly includes academia, state and local government, federal partners, and non-U.S. entities. Capturing requester type as a structured field would accelerate routing, surface potential conflicts of interest earlier in the engagement process, and improve the accuracy of future burden estimates.

Third, equivalence between web and email channels. Section II of the notice provides for submission via the web form or via email. To preserve data quality and reduce downstream reconciliation work, NIST should publish an equivalent structured template for email submissions and require the same field set, so that the two channels produce comparable records.

(d) Minimization of reporting burden through automation or other information technology.

We offer two recommendations.

First, identity persistence for repeat respondents. The CHIPS Program engages with a substantial population of repeat stakeholders (industry coalitions, ecosystem partners, recurring speaker hosts). Each submission currently requires re-entry of contact information. A lightweight account mechanism using login.gov, which the General Services Administration already operates and which is approved for federal use, would allow returning respondents to skip re-entry, reduce per-response burden, and improve data consistency across submissions from the same organization. This recommendation aligns directly with the PRA's stated preference for using "automated collection techniques or other forms of information technology" to minimize burden.

Second, monitoring for content authenticity considerations. As an organization working at the intersection of authorship verification and federal standards, we note that high-visibility federal intake channels are increasingly subject to volume-scaled automated submissions, including AI-generated content that does not represent genuine stakeholder interest. The current 250-respondent volume does not yet warrant authenticity controls, and we do not recommend adding any to this collection at this time. We do recommend that NIST monitor submission volume and origin characteristics as part of future ICR renewals, and consider lightweight content-provenance signals consistent with C2PA and IETF RATS work before manual triage becomes impractical. We are available to provide additional input on this question in a more appropriate venue should NIST find it useful.

We appreciate the CPO's continued engagement with external stakeholders and the opportunity to comment on the operational instruments that support that engagement.

Respectfully submitted,

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