Hello,

Thank you for the opportunity to provide feedback on this important work. ███████████████████
██

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Submission:
Regarding the definition of a machine learning model platform (MLMP) service and high impact generative AI DIS, as currently written the Draft Online Safety (Relevant Electronic Services Class 1A and Class 1B Material) Industry Standard, I think the document could benefit from incorporating a category of MLMP that is "high impact". For example, an MLMP where the majority of their models fit the definition of "capable of producing high impact content", could be considered a high impact MLMP. This would require a provider to perform an assessment of their models, which could be conducted via independent auditing, or via required user input in a model card associated with the model upon upload, or in other ways.

Regarding section 29 Mechanisms for end-users and account holders, as currently written in the Draft Online Safety (Relevant Electronic Services Class 1A and Class 1B Material) Industry Standard, it is unclear to me whether for a machine learning model platform service, the term "material" includes "models capable of generating high impact material". I would suggest updating the definition of the term "material" to clarify that it includes "models capable of generating high impact material".

Cheers,
Rebecca

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