GRDprocess Sàrl — THE FRAME Project

# Structural Analysis of the White House National Policy Framework for Artificial Intelligence

*A National Policy Framework for Artificial Intelligence — Legislative Recommendations*

Formal prescription decomposition using THE FRAME Normalizer

GRDprocess Sàrl — Gaetan Duchateau

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## 1. Recomposed Statement Verification

Before structural analysis, each recomposed statement was verified to confirm full integration of the submitted justification and expected outcome. The recomposed statement formula applied by the Normalizer is:

*[Subject] [Verb] [Object], because [Justification], in order to [Expected Outcome]*

All nine recomposed statements were verified. In P5 and P9, the passive formulation of the prescription ('must be prohibited', 'must be made accessible') produces a recomposed statement without an explicit grammatical subject, which is itself an analytical finding documented below.

## 2. Normalizer Results — P1 to P9

### P1 — Child Protection and Parental Empowerment (General)

| Field | Content |
|---|---|
| **Prescription** | *AI platforms and services must implement measures to protect children and empower parents to control their childrens digital environment* |
| **Justification** | Children are a vulnerable population requiring specific protections in digital environments and parents are the primary responsible parties for their childrens upbringing and AI platforms create new vectors of risk for minors that existing protections do not fully address |
| **Expected Outcome** | Minors are protected from harmful content and exploitation on AI platforms and parents have effective tools to manage their childrens exposure and usage |
| **Goal** | *Absent — not determinable without identifying the prescribing authority* |

**Unbound Variables**

- 'AI platforms and services' — scope undefined: which platforms qualify? all services? only those marketed to minors?
- 'must implement measures' — content of measures entirely undefined, no standard or enumeration
- 'protect children' — protection standard absent, no metric or threshold
- 'empower parents' — tools not specified, operationalisation absent
- 'digital environment' — scope unbounded

**Structural Profile**

Subject: Ambiguous | Verb: Ambiguous | Object: Ambiguous | Justification: Explicit | Mechanism: Absent*

## P2 — Age-Assurance Requirements for Minor-Accessible Platforms

| Field | Content |
|---|---|
| **Prescription** | *AI platforms likely to be accessed by minors must implement age-assurance requirements including parental attestation* |
| **Justification** | Age-appropriate access controls are necessary to enforce differentiated protections for minors and parental attestation ensures that a responsible adult has acknowledged the risks and consented to access |
| **Expected Outcome** | Minors do not access AI platforms without age verification and a parent or guardian has provided informed consent before access is granted |
| **Goal** | *Absent — not determinable without identifying the prescribing authority* |

**Unbound Variables**

- 'likely to be accessed by minors' — probability threshold absent, no criterion for what makes a platform 'likely' to attract minors
- 'age-assurance requirements' — technical standard absent, no specification of acceptable method
- 'parental attestation' — form and verification method absent, no criterion for valid attestation
- Scope of application (all AI platforms vs. specific categories) — not defined

**Structural Profile**

Subject: Ambiguous | Verb: Explicit | Object: Ambiguous | Justification: Explicit | Mechanism: Absent*

## P3 — Risk Reduction Features for Minor-Accessible Platforms

| Field | Content |
|---|---|
| **Prescription** | *AI platforms likely to be accessed by minors must implement features that reduce the risks of sexual exploitation and self-harm to minors* |
| **Justification** | AI systems can generate content that facilitates grooming exploitation and self-harm and minors lack the cognitive and emotional development to recognize and resist such risks and platform-level intervention is more reliable than user-level mitigation |
| **Expected Outcome** | Minors are not exposed to content or interactions that facilitate sexual exploitation or self-harm through AI platforms |
| **Goal** | *Absent — not determinable without identifying the prescribing authority* |

**Unbound Variables**

- 'features' — content undefined, no specification of what constitutes a qualifying feature
- 'reduce the risks' — reduction threshold absent, no minimum effectiveness standard
- 'sexual exploitation' — definitional scope not established in this document
- 'self-harm' — definitional scope not established in this document
- Same subject ambiguity as P2: 'likely to be accessed by minors' without probability criterion

**Structural Profile**

Subject: Ambiguous | Verb: Ambiguous | Object: Ambiguous | Justification: Explicit | Mechanism: Absent*

## P4 — Child Privacy Compliance for AI Systems

| Field | Content |
|---|---|
| **Prescription** | *AI systems must comply with existing child privacy protections including limits on data collection for model training and targeted advertising* |
| **Justification** | Existing child privacy law reflects established social consensus on protecting minors from commercial exploitation and AI systems introduce new modalities of data collection that existing compliance frameworks must cover |
| **Expected Outcome** | No data collected from minors is used for AI model training or targeted advertising without explicit legal authorization |
| **Goal** | *Absent — not determinable without identifying the prescribing authority* |

**Unbound Variables**

- 'AI systems' — scope undefined, which systems qualify
- 'existing child privacy protections' — object is externalized to a legal corpus not reproduced in this document; jurisdiction-dependent
- 'model training' — scope of the prohibition not defined: all training data? synthetic data? anonymized data?
- 'explicit legal authorization' — authorization standard and process absent

**Structural Profile**

Subject: Ambiguous | Verb: Explicit | Object: Externalized | Justification: Explicit | Mechanism: Absent*

## P5 — Prohibition of AI-Generated Child Sexual Abuse Material

| Field | Content |
|---|---|
| **Prescription** | *AI-generated child sexual abuse material must be prohibited under applicable laws* |
| **Justification** | The harm of child sexual abuse material is not contingent on whether the content is generated by AI or through direct abuse and AI generation creates a scalable vector for production of such material that existing prohibitions must explicitly cover |
| **Expected Outcome** | AI-generated child sexual abuse material is treated as equivalent to non-AI-generated material under applicable law and no platform may generate or distribute such content |
| **Goal** | *Absent — not determinable without identifying the prescribing authority* |

**Unbound Variables**

- Subject/agent absent — passive formulation ('must be prohibited') does not identify the actor responsible for the prohibition
- 'applicable laws' — object is externalized to a legal corpus, jurisdiction-dependent
- Legislative vs. regulatory vs. platform-level prohibition — modality not specified
- Enforcement mechanism — absent from this document

**Structural Profile**

Subject: Absent (passive) | Verb: Explicit | Object: Explicit | Justification: Explicit | Mechanism: Absent*

## P6 — Ratepayer Cost Protection from AI Infrastructure

| Field | Content |
|---|---|
| **Prescription** | *AI infrastructure development must not result in increased electricity costs for residential ratepayers* |
| **Justification** | AI data center construction creates significant new electricity demand and the cost of this demand must not be externalized onto residential ratepayers who derive no direct benefit from AI infrastructure buildout |
| **Expected Outcome** | Residential electricity costs remain unaffected by AI infrastructure expansion and AI developers bear the full cost of their energy consumption |
| **Goal** | *Absent — not determinable without identifying the prescribing authority* |

**Unbound Variables**

- 'AI infrastructure development' — scope of actors undefined: which developers? which projects?
- 'result in' — causal attribution method absent: no mechanism to establish whether rate increases are caused by AI infrastructure vs. other grid factors
- 'increased electricity costs' — baseline absent, counterfactual absent, attribution methodology absent
- 'residential ratepayers' — geographic scope undefined
- Regulatory authority responsible for enforcement — absent

**Structural Profile**

Subject: Ambiguous | Verb: Explicit | Object: Ambiguous | Justification: Explicit | Mechanism: Absent*

## P7 — Anti-Fraud and Anti-Impersonation Measures

| Field | Content |
|---|---|
| **Prescription** | *AI platforms and services must implement measures to combat AI-enabled impersonation scams and fraud targeting vulnerable populations* |
| **Justification** | AI enables increasingly convincing impersonation at scale and vulnerable populations such as seniors lack the technical literacy to detect AI-generated fraud and platform-level countermeasures are more effective than user-level awareness |
| **Expected Outcome** | Vulnerable populations are not deceived by AI-enabled impersonation and fraud attempts are detected and blocked at the platform level before reaching end users |
| **Goal** | *Absent — not determinable without identifying the prescribing authority* |

**Unbound Variables**

- 'measures' — content undefined, no specification of qualifying countermeasures
- 'combat' — effectiveness threshold absent, no minimum success rate
- 'AI-enabled impersonation scams' — technical identification criterion absent: what distinguishes AI-enabled from conventional fraud?
- 'vulnerable populations' — population definition absent beyond the illustrative example of seniors
- Detection and blocking obligation in expected outcome — operationalisation absent

**Structural Profile**

Subject: Ambiguous | Verb: Ambiguous | Object: Ambiguous | Justification: Explicit | Mechanism: Absent*

## P8 — National Security Consultation for Frontier AI

| Field | Content |
|---|---|
| **Prescription** | *AI developers must consult with national security agencies to identify and mitigate potential risks from frontier AI model capabilities* |
| **Justification** | Frontier AI models may possess capabilities with national security implications that developers cannot fully assess independently and national security agencies have the institutional knowledge to evaluate these risks and recommend mitigations |
| **Expected Outcome** | Potential national security risks from frontier AI models are identified before deployment and mitigations are established through coordination between developers and relevant agencies |
| **Goal** | *Absent — not determinable without identifying the prescribing authority* |

**Unbound Variables**

- 'AI developers' — scope undefined: all developers? only those building frontier models? threshold for 'frontier' absent
- 'frontier AI model capabilities' — no quantitative or qualitative definition of frontier threshold
- 'national security agencies' — which agencies? not enumerated
- 'consult' — form, frequency, timing, and outcome obligations absent: what constitutes a completed consultation?
- 'mitigate' — mitigation standard absent, no success criterion or minimum requirement

**Structural Profile**

Subject: Ambiguous | Verb: Explicit | Object: Ambiguous | Justification: Explicit | Mechanism: Absent*

## P9 — Small Business Access to AI Resources

| Field | Content |
|---|---|
| **Prescription** | *AI resources including grants and technical assistance must be made accessible to small businesses* |
| **Justification** | AI capability is currently concentrated among large enterprises with resources to develop and deploy AI tools and small businesses lack the capital and expertise to access AI benefits without structured support |
| **Expected Outcome** | Small businesses have access to AI tools and knowledge at a cost and complexity level appropriate to their capacity and AI economic benefits are distributed across the full range of American industry |
| **Goal** | *Absent — not determinable without identifying the prescribing authority* |

**Unbound Variables**

- Agent absent — passive formulation ('must be made accessible') does not identify the actor responsible: Congress? Federal agencies? State programs?
- 'AI resources' — scope and content undefined: which resources qualify?
- 'accessible' — accessibility standard absent: what level of cost and complexity is 'appropriate to their capacity'?
- 'small businesses' — size definition absent (employee count? revenue threshold? sector?)
- 'American industry' — geographic scope implies US-only, potential conflict with international operators

**Structural Profile**

Subject: Absent (passive) | Verb: Explicit | Object: Ambiguous | Justification: Explicit | Mechanism: Absent*

# 3. Synthesis Table — P1 to P9

* Absent from this document. Status in the complete legislative or regulatory system: not determinable by an external auditor.

| ID | Subject | Verb | Object | Justification | Mechanism | Category |
|---|---|---|---|---|---|---|
| P1 | Ambiguous | Ambiguous | Ambiguous | Explicit | Absent* | Standard — actor scope undefined |
| P2 | Ambiguous | Explicit | Ambiguous | Explicit | Absent* | Subject ambiguous — probability threshold |
| P3 | Ambiguous | Ambiguous | Ambiguous | Explicit | Absent* | Inherits P2 subject ambiguity |
| P4 | Ambiguous | Explicit | Externalized | Explicit | Absent* | Object externalized to legal corpus |
| P5 | Absent (passive) | Explicit | Explicit | Explicit | Absent* | Agent-absent — passive formulation |
| P6 | Ambiguous | Explicit | Ambiguous | Explicit | Absent* | Causal attribution absent |
| P7 | Ambiguous | Ambiguous | Ambiguous | Explicit | Absent* | Standard — 'vulnerable populations' unbound |
| P8 | Ambiguous | Explicit | Ambiguous | Explicit | Absent* | 'Frontier' threshold absent |
| P9 | Absent (passive) | Explicit | Ambiguous | Explicit | Absent* | Agent-absent — passive formulation |

# 4. General Structural Conclusion

Across nine prescriptions extracted from two sections of the White House National Policy Framework for Artificial Intelligence, four structural patterns are identified.

**Pattern 1 — Execution mechanism absent in 100% of prescriptions**

No prescription in this document contains an execution mechanism. This is consistent with the legislative genre of the document: it addresses Congress as the implementing actor, not an identified operational agent. The finding is therefore not a defect of drafting but a structural property of the normative register — legislative recommendations operate upstream of implementation.

**Pattern 2 — Justification explicit in 100% of prescriptions**

Every prescription provides an explicit justification. This distinguishes the White House document structurally from documents such as the Anthropic Constitution (January 2026), where justification is frequently ambiguous or circular. The rationale for each prescription is clear and non-circular. The gap is exclusively in execution, not in motivation.

**Pattern 3 — Two agent-absent prescriptions via passive formulation**

P5 and P9 use passive formulations ('must be prohibited', 'must be made accessible') that suppress the responsible actor from the prescription structure. This is not a stylistic choice: it is a structural decision that defers the allocation of responsibility. A structurally bound version of each prescription would require identifying the actor (Congress, a federal agency, platforms) before the obligation can be evaluated for coherence.

**Pattern 4 — Scope of application systematically undefined**

'AI platforms and services', 'AI systems', 'AI developers', and 'AI infrastructure development' appear as subjects across eight of nine prescriptions without a common definition or scope criterion. The same actor is addressed under different labels without establishing whether these refer to the same set of entities. This creates a cross-prescription coherence risk: obligations may apply to overlapping or inconsistent actor populations depending on interpretation.

## Overall Finding

The document is structurally coherent at the level of justification: every prescription knows why it prescribes. It is structurally incomplete at the level of execution: no prescription specifies how compliance is achieved, measured, or verified. This is the expected structural property of a legislative recommendation document. The analytical finding of THE FRAME Normalizer is therefore not a critique of the document's purpose but a formal demonstration of the gap between normative intent and operational executability — a gap that any implementing regulation would need to close.