ai integrators
COUNCIL

October 8, 2026

The Honorable Julie Menin
Speaker of the New York City Council
City Hall
New York, NY 10007

Re: October 5 Committee of the Whole Hearing Examining AI Risks

Dear Speaker Menin,

The AI Integrators Council serves as the primary voice for leading companies working to integrate artificial intelligence into systems, platforms, and applications. The Council was created to educate policymakers and other essential stakeholders about the complexity of roles, responsibilities, and relationships across the AI ecosystem and to advocate for policies based on an accurate understanding of this ecosystem. The Council is made up of leading AI companies including Alteryx, Atlassian, Box, Cognizant, Docusign, Peraton, SAP, SAIC, Salesforce, ServiceNow, and Twilio.

As AI continues to evolve and expand, we believe it is essential that AI policy at the local, state, and federal levels fully reflect the complexity of the AI value chain, particularly the critical role played by integrators. Initial policy discussions, draft legislation and potential regulations thus far have often centered on binary definitions such as “developers” and “deployers” of AI models. However, the AI community includes numerous stakeholders, including integrators, developers of foundational models, developers of applications, infrastructure and networks providers, deployers of consumer-facing products and applications, and many others. AI systems do not move from laboratory to market in a single step, but rather are developed, refined, integrated, and deployed by a chain of contributors with distinct capabilities, risks, and responsibilities. The outcome is new use cases, driving real-world impact for businesses and consumers alike.

Integrators play a central role in technical and design decisions that directly shape how AI is used and how risk is managed in practice, often in a business-to-business (B2B) context. Many of these roles are underpinned by contracts that ensure compliance with data protection, IP, and other relevant rules. As the AI ecosystem and the technology itself rapidly develops, we anticipate even more and varied players will participate. To ensure responsible and effective policymaking, it is essential that AI policy is forward-looking. These rules should clearly recognize the various actors and anticipate the continuing evolution of the participants in the AI ecosystem.

We urge the New York City Council to recognize AI integrators as a distinct and essential link in the AI value chain, and to ensure that any potential regulation or guidance reflects this reality. Doing so will help ensure policy clarity, promote responsible innovation, and support companies

that serve as critical enablers of AI adoption across sectors. For additional information, the AIIC's foundational white paper offers three key insights for AI policymakers including:

- Understanding the role and impact of AI Integrators in the AI value chain. Our paper provides a framework for the AI value chain and the role of AI Integrators in it, including examples from member companies of the AI Integrators Council.
- Appreciating the limitations of the developer-deployer binary for AI policymaking. We explain the shortcomings of the developer-deployer distinction, especially as the AI value chain expands, and we offer legislative examples of misplaced reliance on this binary.
- Practical approaches to addressing AI Integrators in AI policy. We offer draft definitions and similar tools to support AI policymakers in developing policy initiatives that strengthen and enable the full AI value chain, including AI Integrators.

We welcome the opportunity to engage further and share recommendations, both technical and policy-oriented, on how to define and support the role of AI integrators as the Council continues to develop and examine AI policies.

Thank you for your leadership on these critical issues. We look forward to continued collaboration as you work to promote AI innovation.

Sincerely,

Wes McClelland
Executive Director
AI Integrators Council