

To: The Honorable Pamela Jo Bondi, Attorney General of the United States
Cc: Office of Legal Policy, U.S. Department of Justice
Date: July 30, 2025

Dear Attorney General Bondi and Colleagues,

Thank you for sharing the July 14 memorandum on implementing Executive Order 14 224, which includes the statement:

*Technological advances in translation services will permit agencies to produce cost-effective methods for bridging language barriers and reducing inefficiencies with the translation process. The Department encourages other agencies to follow its approach of considering **responsible use of artificial intelligence and machine translation** to communicate with individuals who are limited English proficient. (3) [emphasis added]*

Your memo wisely highlights the need for **responsible** use of automatic translation in communicating with people who have limited English proficiency. It states that all mission-critical multilingual material “should be translated accurately and include a clear note that English is the official language and authoritative version of all federal information.”

To reduce the risk of serious translation errors that can create legal, safety, and operational problems, we respectfully recommend a simple standards-based framework that includes layering a *label* (explained below) along with the mandated English-authoritative notice.

What We Mean by “Responsible Translation”

We define responsible translation as making sure the translated message matches the original, especially when there’s risk of harm if it doesn’t. This often requires using professional human translators—not just relying on automatic tools—because critical errors are sometimes not apparent from the translated output and cannot be reliably detected using artificial intelligence.

Why Responsible Translation Matters: Real-World Examples

The following examples are summaries of real instances in which reliance on commercially available AI translation tools resulted in harm to individuals and organizations.

- **Patient-Consent Error (Acute Care)** – A consent interview was conducted using Google Translate. The patient’s uterus was removed. It turned out that she did not understand what was going to happen, raising informed-consent concerns because of translation errors.
- **Wildfire Alert (Emergency Messaging)** – An AI tool mistranslated a public emergency message as “park your car *close* to a fire”, potentially endangering motorists who followed the instruction.

- **Contract Abbreviation (Commercial Law)** – An AI translation tool expanded a Greek corporate acronym into an unrelated foreign entity, threatening the validity of a multimillion-dollar contract. Errors in much legal translation are high-impact.
- **911 Call (Law-Enforcement Dispatch)** – An AI-interpreted 911 call omitted escalating background sounds; deputies were put at risk as they arrived unaware of a violent dispute in progress, and a victim sustained head injuries.
- **Foreign News broadcast (News Source)** – During a live telecast, the Japan public broadcaster’s AI-subtitle engine mistranslated important geographic information, triggering diplomatic backlash and public misinformation that led the broadcaster to discontinue the service. Uncorrected errors in raw automatic translation can involve risks to national interests.

In each case, the translation sounded fluent but hid critical errors—mistakes that could have been caught by applying risk assessment principles and professional human oversight.

Labels: A Simple Solution with Big Benefits

A key component of responsible translation is attaching a label to each piece of translated material. ASTM International (www.astm.org) is balloting an amendment to its Standard Practice for Language Translation. The amendment codifies the following dual-label regime for translated materials:

- **Professionally Verified Translation** – a qualified human produces or edits the translation, and the professional or some organization takes responsibility that it meets agreed-on specifications based on the use case
- **Un-Verified Translation** – everything else, including raw automatic translation

The cost of attaching one of these labels to each piece of translation output is negligible, yet it gives end-users instant clarity about verification status and reduces downstream costs due to harm resulting from translation errors. They can help reduce legal liability and enable individuals to know when they might need to seek additional clarification or assistance.

It is also important to note that the risk to individuals and the government from AI-based translation technology is far greater in cases involving any of the hundreds of languages spoken in the US that have little or no digital presence.

How FIT North America Can Help

FIT North America, a regional center of FIT (www.fit-ift.org), the International Federation of Translators, and partner associations stand ready to assist in the following ways:

1. Help agencies map current translation practices to the framework at the end of this letter.

2. Provide risk guidance and use case examples from our forthcoming report on AI safety in translation.
3. Support training for procurement and compliance teams on how to combine the speed of AI with human safeguards.

By adopting a shared definition of responsible translation and a standardized labeling system, the Department can achieve the memorandum’s dual objectives of efficiency and responsibility while enhancing public safety, fiscal prudence, and legal defensibility. In addition, FIT can continue to promote the importance of translation as a profession while adapting to new technologies. I believe that our strategic objectives are compatible.

We appreciate your consideration and look forward to collaborating on next steps.

Respectfully,

[signature]

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Endorsements from additional organizations are attached.

P.S. Technical **framework** for implementing responsible translation:

Action Item	What it Requires	Practical Mechanism
Define the use case	A use case includes the source and target languages, the purpose and intended audience of the translation.	Use F2575, a mature standard from ASTM International (www.astm.org), to develop translation policies and procedures.
Apply risk management	Identify the risk of harm resulting from translation errors. Risks are not the same for all translation projects.	Develop an inventory of use cases. Identify an error-tolerance level for each use case and mitigate risks to that level.
Provide transparency	Attach a standardized label to each piece of translation, to indicate whether it has been verified by a qualified professional.	Verification refers to both production of new translations and bilingual editing of existing translations.