

The Decision Window

What 202 consequential AI systems reveal about control, evidence and the cost of scaling before assurance catches up.

CCC	202	BB	CHOICE
global public position	systems assessed	healthcare	the asset at stake

The headline is CCC. The message is not.

The first RATE AI release is best understood as a map of remaining decision freedom. AI adoption is accelerating into operating models at the same time that regulators, public authorities and sector supervisors are asking for more traceability, clearer ownership and evidence that survives external scrutiny. The question for leaders is therefore moving from "do we have an AI policy?" to "do we still control the next move?"

Four questions for any board

Can we see the whole consequential AI estate?

Can we prove what was known and who decided?

Can our evidence travel across markets, suppliers and regulators?

Can we still pause, redesign or withdraw without disproportionate cost?

RATE AI does not treat the rating as a moral judgment or a legal certificate. The public band compresses a complex evidence position into a common executive language. The analysis then asks what that position means for scale, market entry, procurement, oversight and the timing of intervention.

The rating measures remaining room to act.

A rating becomes useful when it changes a decision. The four public ranges can be read as a progression from internally controlled expansion toward externally constrained action.

AAA / AA / A	You own the pace. Governable expansion. Scale with normal discipline; keep evidence current and preserve the ability to pause. Strong bands mean decision freedom remains internally anchored, not that risk is zero.
BBB / BB / B	The window is open. Compression. Growth can continue, but evidence, ownership or exposure gaps deserve active closure before the next market, model or procurement change makes them more expensive.
CCC / CC / C	Executive decision zone. Intervention before constraint. Decide what needs evidence, redesign, ring-fencing or deceleration while the organisation still owns the remedy and the narrative.
DDD / DD / D	Continuity is at stake. Structural constraint. Priorities shift toward containment, preservation of evidence and protection of the wider portfolio as options narrow.

The key variable is reversibility

The strongest position is not a world with no risk. It is a world in which the organisation can still choose the timing and form of correction. As the band weakens, action becomes more visible, more expensive and more likely to be shaped by regulators, counterparties, courts or public pressure.

This interpretation follows the underlying RATE AI logic of preserving discretion, decision defensibility and the power to pause or redesign while options still exist. The technical scoring logic remains separately published; the public report starts with what a leader can do with the result.

AI is scaling faster than assurance.

The external market has already moved beyond the pilot phase. Governance now has to work at portfolio scale.

20%	55%	92%	CCC
EU enterprises using AI in 2025	large EU enterprises	EU banks deploying AI	RATE AI global position

This is the real backdrop to the first rating.

Eurostat reports that AI use in EU enterprises rose from 13.5% in 2024 to 20.0% in 2025; among large enterprises it reached roughly 55%. The European Banking Authority observed that 92% of EU banks were already deploying AI. Public policy is pushing in the same direction: the European Commission's AI Continent Action Plan aims to mobilise EUR 200 billion for AI development, while the Apply AI agenda promotes adoption across strategic industries and the public sector. The Financial Stability Board has responded to rapid financial-sector adoption by calling for better information, framework review and stronger supervisory capability.

Placed beside a global RATE AI position of CCC, the pattern is commercially important. Adoption is no longer waiting for assurance architecture to become perfect. AI is being embedded in customer journeys, fraud detection, credit, content, clinical support, work and public administration while the evidence trail around those decisions remains uneven.

What this changes for a board

A portfolio can become strategically dependent on AI before the organisation can prove how the system was approved, changed or monitored. Once that happens, a control gap can become a transaction delay, procurement problem, regulatory burden or expensive redesign rather than an internal documentation issue.

Official context: [Eurostat](#) | [EU AI Continent](#) | [EBA](#) | [FSB](#)

The Evidence Premium

The first cohort suggests that the ability to prove control is becoming part of the value of control itself.

202	40	PROOF	TIME
systems rated	at 90%+ transparency	not publicity	avoid reconstruction under pressure

Why 90% matters less as a statistic than as a management signal

Forty of the first 202 rated systems reach at least 90% verifiable transparency. RATE AI does not infer that transparency alone caused any rating. The important observation is that strong external assurance is easiest where the evidence trail is unusually reconstructable.

That makes transparency an operating asset. A board, supervisor, investor or counterparty does not need every internal document. It needs a coherent evidentiary spine: what was known, who owned the decision, what changed after deployment, which alternatives were considered and whether the organisation retained the ability to act.

This direction is visible outside RATE AI as well. EU transparency obligations are now in force for specified AI systems. OECD principles call for lifecycle traceability and systematic risk management. The OECD has also proposed a common 29-criteria reporting framework for AI incidents across sectors and jurisdictions.

The decision-maker translation

The question is not "how transparent are we?" It is "could an independent reviewer reconstruct our judgment quickly enough that we still control the interpretation?"

Official context: [EU AI Act transparency](#) | [OECD AI Principles](#) | [OECD incident reporting](#)

Healthcare’s hidden advantage

Healthcare BB versus finance CC may be revealing the value of regulatory muscle memory.

BB	CC	1,300+	92%
Healthcare	Finance & credit	authorised AI medical devices	EU banks deploying AI

The band gap is a question, not a verdict.

Healthcare is rated BB in the first industry comparison, while finance and credit are rated CC. Both sectors are highly regulated and technically sophisticated. The difference therefore invites a more useful question than "which sector is better governed?": what kind of institutional environment produces evidence that remains usable when AI is challenged?

Healthcare has decades of safety, validation and post-market evidence practice. The FDA reported more than 1,300 authorised AI-enabled medical devices by the end of 2025, maintains a public list with releasable safety/effectiveness information and frames AI-enabled devices through a total-product-lifecycle approach. WHO Europe simultaneously shows that health AI is already widespread while national legal and workforce readiness remain uneven.

Finance faces a different scale problem. The EBA observes 92% deployment across EU banks, and the FSB highlights information gaps and supervisory needs. The public assurance challenge can therefore expand across many models, vendors, use cases and legal regimes even where mature risk functions already exist.

Hypothesis for later cohorts

Regulated evidence culture may create an assurance advantage when it leaves behind structured lifecycle records. RATE AI will test this pattern rather than assume it.

Official context: [FDA AI device list](#) | [FDA lifecycle guidance](#) | [WHO Europe](#) | [EBA](#) | [FSB](#)

Your AI does not have one compliance date.

The legal environment is becoming more operational and more asynchronous at the same time.

EU	2027	2028	GLOBAL
transparency duties now live	Annex III high-risk rules	regulated-product high-risk rules	interoperability pressure

The EU clock now has multiple hands.

The AI Act became broadly applicable on 2 August 2026 and Article 50 transparency duties are now enforceable. Following the AI Omnibus, Annex III high-risk rules apply from December 2027 and product-embedded high-risk rules from August 2028. Decisions made now about architecture, suppliers and data can determine whether those later dates produce a controlled adjustment or a forced redesign.

Outside the EU, the accountability model is different. The UK has made its Algorithmic Transparency Recording Standard mandatory across central government for in-scope tools. US federal policy combines accelerated AI use with governance and acquisition rules. OECD work is seeking interoperable incident reporting. The Council of Europe has created a legally binding treaty framework whose ratification process is still developing.

What a multinational actually needs

Not one global law. One global evidence spine that lets each jurisdiction ask its own question without forcing the organisation to rebuild the history of the system from scratch.

The first RATE AI release also shows a classification gap: 56% of assessed systems meet the EU high-risk benchmark, and 71% of that group operate where the closest binding classification follows another logic or is still developing. The figure is a RATE AI comparative benchmark, not a claim that those systems are legally classified as high-risk everywhere.

Official context: [European Commission AI Act timeline](#) | [UK ATRS](#) | [White House OMB](#) | [OECD](#) | [Council of Europe](#)

Same CCC. Different executive problem.

A common band creates comparability. Context determines the route forward.

CCC	CCC	PUBLIC	PRIVATE
Private	Public	visible accountability	portfolio complexity

What CCC should trigger

The public and private sectors are both rated CCC in the first release. The practical meaning is not that their internal governance is identical. It is that both should treat the position as an executive decision zone and ask what can still be corrected while the remedy remains proportionate and internally controlled.

Public institutions increasingly operate under visible accountability. The EU AI Act requires fundamental-rights impact assessment for specified high-risk public and public-service uses, including affected groups, human oversight and mitigation. The UK ATRS adds public transparency and accountable ownership for in-scope central-government tools.

Private organisations often face distributed complexity: third-party models, embedded services, regional variants, acquisitions, supplier contracts and rapid product change. Their assurance challenge is preserving one line of sight across the portfolio as the technical and legal stack moves.

Same band, different first action

Public: strengthen ownership, contestability and visible evidence. Private: strengthen portfolio census, supplier and version traceability, jurisdiction mapping and the decision chain. The rating tells both leaders to act; the anatomy tells them where.

Official context: [EU AI Act](#) | [UK ATRS](#) | [OECD AI Principles](#)

What leaders can do in the next 90 days

The first release points to a small set of actions that preserve room to move before assurance gaps become externally constrained problems.

1. Build the real AI estate	Catalogue consequential AI by system, use case, model/provider, jurisdiction, affected population and decision owner. Include embedded and shadow uses.
2. Identify systems in the decision window	Prioritise systems whose band, scale, public exposure or upcoming legal clock makes delay materially more expensive.
3. Create one decision evidence spine	Connect the business decision, technical state, legal basis, oversight route, alternatives considered and escalation history so the record can travel.
4. Test the power to pause	For material systems, prove that rollback, substitution, restriction or withdrawal remains technically, contractually and operationally possible.
5. Benchmark before the irreversible event	Use comparable ratings before major procurement, market entry, scale-up, merger integration or public deployment, when options are still broad.

Romania: a governance-before-scale window

Romanian enterprise AI use was 5.2% in 2025 versus 20.0% across the EU. The 2026 Digital Decade report still describes limited technology uptake and recommends clearer AI roles, while Romania already has a national AI strategy for 2024-2027. This creates a rare opportunity to build ownership, evidence and portfolio visibility before adoption becomes infrastructural.

Official context: Eurostat | Romania 2026 Digital Decade report | National AI Strategy 2024-2027

Technical disclosure

Evidence cut-off: 31 August 2026. Main cohort: 202 assessed systems. ONE RATE AI Rating is the public headline band used in this release. Component analysis and evidence rules are documented in the Public White Paper v1.1. Public aggregate outputs contain no assessed entity or individual-system names.

RATE AI ratings are independent risk-intelligence positions. They are not legal opinions, regulatory approvals or certificates of compliance.