

Understanding and Formalizing Accountability for Cyber-Physical Systems

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Abstract—Accountability is the property of a system that enables the uncovering of causes for events and helps understand who or what is responsible for these events. Definitions and interpretations of accountability differ; however, they are typically expressed in natural language that obscures design decisions and the impact on the overall system. This paper presents a formal model to express the accountability properties of cyber-physical systems. To illustrate the usefulness of our approach, we demonstrate how three different interpretations of accountability can be expressed using the proposed model and describe the implementation implications through a case study. This formal model can be used to highlight context specific elements of accountability mechanisms, define their capabilities, and express different notions of accountability. In addition, it makes design decisions explicit and facilitates discussion, analysis and comparison of different approaches.

Index Terms—CPS, STS, accountability, formal model

I. INTRODUCTION

Cyber-physical systems (CPS), such as robots, drones, vehicles, and industrial control systems, use sensors, software, and actuators to sense, monitor, and control or influence the physical world. CPSs cannot be tested completely and, differing from information systems, mistakes made by such systems are always permanent. It is impossible to “undo” actions of CPS or roll the world back to the last known good state. The primary problem is that such systems are *open*, i.e., they work jointly with other systems that are not known a priori. This lack of clearly defined system boundaries results in unexpected interactions and problems. Thus it is important that such systems are *accountable*: They should provide evidence of their actions that an investigator can understand, and the gained knowledge can then be used to improve the system, trace bugs, or as forensic evidence in legal actions [1]. An *accountability mechanism* will not prevent unwanted events; however, it will help to detect them and determine their root cause. In addition, the analysis can be applied to improve the system and develop preventive measures. For example, consider a recent fatal accident involving a self-driving Uber car [2] (Section IV). For a currently unknown reason the autonomous

car crashed into and killed a pedestrian who was crossing the street at night. In this example, accountability does not automatically imply legal liability or even punishment for Uber or the safety driver. Here, accountability is the requirement to explain the chain of events that led to this tragic death. The results may then be used to infer legal liability and improve the system to avoid such accidents in the future. However, accountability is a context specific concept and will differ in various contexts. For example, an autonomous car will be held to a different standard than a toy helicopter. Many different notions of accountability exist in various domains, and no unified framework exists to capture their differences and evaluate their impact on the implementation of CPSs.

In this paper, we investigate the *problem* of capturing the relevant accountability properties of a CPS. As a *solution*, we propose a formal model of accountability that allows us to express and compare notions of accountability.

Our primary *contribution* is the formalization of three notions of accountability. In addition, we demonstrate how these formalizations can be used to compare such notions and analyze their impact on the implementation of a CPS in a case study inspired by the self-driving Uber car incident.

II. BACKGROUND

A. Accountability in Computer Science

In computer science, accountability came into focus following a study published by Weitzner et al. [3], who looked at preventing data leaks in information systems (e.g., medical record systems) and proposed abandoning the classic preventive approach to data privacy in favor of a detective approach. Rather than attempting to prevent data leaks, they suggested systems be built such that leaks can be easily identified. Their approach relies on existing social measures (e.g., courts) to punish perpetrators and deter misbehavior. Feigenbaum et al. [4] and Küsters et al. [5] provided detailed formal definitions of specific interpretations of accountability in particular contexts. The problem with such approaches is that they adopt a single interpretation of accountability and build their system around it. However, accountability is highly dependent on social and cultural contexts. Thus, any system that claims to be accountable must necessarily support different notions of accountability depending on the context. To validate this

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assumption, we recently conducted a systematic mapping study [6] and found that implementations of accountability mechanisms in the literature are very diverse and do not follow a unified model or interpretation of accountability.

The notion of determining causes and attributing responsibility is not a new idea and is not always referred to as accountability. For example, programs are instrumented with logging statements [7] to audit and reconstruct their execution. In computer security, developing systems to gather relevant evidence during cyber attacks is referred to as forensics-by-design [8]. Runtime verification [9] is a collection of techniques to check whether a system violates some correctness property. As with current approaches to accountability, such runtime verification techniques do not lend themselves to the expression and comparison of system's accountability relative to its socio-technical contexts.

B. Accountability in Social Sciences

As an example for a definition of accountability, Lindberg [10] surveyed the social science literature and provided the following synthesized definition of accountability:

- 1) An agent or institution who is to give an account (A for agent);
- 2) An area, responsibilities, or domain subject to accountability (D for domain);
- 3) An agent or institution to whom A is to give account (P for principal);
- 4) The right of P to require A to inform and explain/justify decisions with regard to D; and
- 5) The right of P to sanction A if A fails to inform and/or explain/justify decisions with regard to D.

However, the seeming clarity of the definition hides many small differences and one major point: The definitions do not agree on whether a principal should have the right to sanction agents for the content of their account, or only if they fail to provide a justification for their decisions.

In psychology, Hall et al. [11] surveyed *felt accountability* literature and found that accountability is generally understood to mean that actors think there is a possibility that their actions will be evaluated by a third party.

C. Accountability in Organizations

In contrast to social sciences, organizational sciences often apply a Responsible-Accountable-Consult-Inform (RACI) framework [12] to visualize the roles of people in an organization. The elements of the framework are described as follows:

- **Responsible:** The individual who completes a task. Responsibility can be shared.
- **Accountable:** The person who answers for an action or decision. There can be only one such person.
- **Consult:** Persons who are consulted prior to a decision. Communication must be bidirectional.
- **Inform:** Persons who are informed after a decision or action is taken. This is unidirectional communication.

Note that the RACI framework focuses on the organization rather than individuals in the organization. While differing

from Lindberg's definition [10], this perspective can be very useful to model the accountability of CPSs that work in conjunction with humans such as service robots. We modify the RACI framework as follows to make it more appropriate for CPS contexts.

- **Responsible:** The entity whose action(s) caused an outcome.
- **Accountable:** The person/institution who knows about the machine's actions and has the ability to change its action.
- **Consult:** Persons/institutions who build and set-up the machine(s).
- **Inform:** Persons/institutions who know about the system and are tasked with after-the-fact analysis of an outcome.

Relative to this modified definition, many studies, notably Feigenbaum et al. [4], have defined accountability more in line with what is the *responsible* element of the RACI model. While it is important to know which machine caused a given outcome, stopping at responsibility is often insufficient, because we cannot reasonably punish a machine. We want to make it easy to identify which person or institution can be held accountable for the action of the machine.

III. FORMAL MODEL

A. Overview

To help express and discuss accountability concepts, we developed the following formal model, in which we employ Z notation [13]. Initially, the proposed model introduces some *given sets*. These sets represent the basic concepts of our universe of discourse and they are *underspecified*. In other words, we leave it to the concrete implementation to define a suitable representation for them. Next, the proposed model describes some context-specific *interfaces* that are implementation-specific and thus are also underspecified. Based on these interfaces, we describe some basic *axioms* that are valid independent of the concrete system. We conclude with a description of a *state space* suitable for CPSs and provide detailed examples in Section IV.

B. Given Sets

```
[Account, Action, Component]
Being ::= Human | Animal
Event ::= EnvironmentEvent | SystemEvent
Principal ::= Person | LegalEntity
```

Here, an `Account` can, for example, be a well-structured log file or a story told by a human witness, and `Actions` are anything a principal can do to prevent a CPS from doing something. How `Components` look, are scoped, and implemented depends on the given use case. `Beings` are entities that the system may encounter; however, `Beings` have no control over the system and do not play an active part. `Events` can either be `SystemEvents` or `EnvironmentEvents`. The sources of `EnvironmentEvents` are external to the system, and such events will not show up in log files directly. In contrast, `SystemEvents` are recorded in log files. Furthermore, `Principals` can either be `Persons` or `LegalEntities`, e.g., companies.

The distinction between *Principal* and *Being* is not obvious. While persons are generally humans, in this context, we differentiate them in terms of their function, where a *Principal* is an entity that is part of the system, its legal “surroundings” and can be responsible for actions of the system, and a *Being* is not an active component of the system. Note that humans can be both principals and beings.

C. Context- and Implementation-specific Interfaces

Next, we define a few axiomatic relations. Similar to the basic types above, we leave the details to the specific implementation. We simply require them to exist and comply with the given signature.

$Observation : (Event \times Component) \rightarrow Account$ $ComponentConfiguration : Component \rightarrow Principal$ $hasAccount : Account \leftrightarrow Principal$ $correctionAction : (Principal \times Component) \rightarrow Action$ $caused : Event \rightarrow \mathbb{P}(Component)$
--

An *Observation* indicates that an event caused by or about a component was observed by someone or something and is part of their account. *ComponentConfigurations* track if a component was set up and/or configured by some principal. *hasAccount* is a relation that should contain all accounts belonging to a principal. Note that we cannot assume to know all such accounts because a principal may lie or forget. *correctionAction* gives the set of all actions a principal can take to correct the behavior of a component. *caused* returns the set of components directly responsible for an event. In some cases, this can be computed efficiently [14]. The cause of an event may be unknown; thus it is a partial function. Furthermore, this function could point to multiple possible causes. Therefore we require a dedicated resolution process to resolve such disagreements.

D. Context-independent Axioms

$informed : Component \rightarrow \mathbb{P}(Principal)$ $\forall c : Component \bullet \forall p : Principal \bullet$ $p \in informed(c) \Leftrightarrow$ $\exists e : Event \bullet hasAccount(Observation(e, c)) = p$

$constructed : Component \rightarrow \mathbb{P}(Principal)$ $\forall c : Component \bullet \forall p : Principal \bullet$ $p \in constructed(c) \Leftrightarrow$ $\exists c : Component \bullet ComponentConfiguration(c) = p$

$responsible : Component \leftrightarrow Principal$ $\forall c : Component \bullet \forall p : Principal \bullet$ $responsible(c) = p \Leftrightarrow$ $p \in informed(c) \wedge (p, c) \in dom(correctionAction)$

informed provides the set of all principals that gain knowledge about a component. This means that the principal has an account in which an observation about a component that is somehow responsible for this event is logged. A principal has helped construct a system if they worked on the *ComponentConfiguration*. The notion of *responsible* is closely linked to the notion of

caused above. However, while causality is a much broader concept, *responsible* means actual people who can stop someone or something from doing something. A principal is *responsible* for some component, if it knows about it and could do something about it.

E. Definitions of Accountability

With these basic building blocks, we define three notions of accountability:

$raci_accountable : Event \leftrightarrow Principal$

$\forall e : Event \bullet \forall p : Principal \bullet$ $raci_accountable(e) = p \Leftrightarrow$ $\exists c : Component \bullet c \in caused(e) \wedge responsible(c) = p$
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$lindberg_accountable : Component \leftrightarrow Principal$

$\forall c : Component \bullet \forall p : Principal \bullet$ $lindberg_accountable(c) = p \Leftrightarrow$ $p \in informed(c) \wedge$ $(responsible(c) = p \vee p \in constructed(c))$

$hall_accountable == \{c : Component \mid$ $\exists p : Principal \bullet p \in informed(c) \bullet c\}$
--

First, a principal is *raci_accountable* (Section II-C) for some event if a component for which the principal is responsible caused the event. The second definition expresses Lindberg’s definition of accountability [10] (Section II-B). A component is *lindberg_accountable* to a principal if:

- The component must give an account to a principal. In our model this means that the principal is *informed* about the component.
- There is an area of accountability. The area of accountability is implicitly defined by the purpose of the CPS.
- A principal exists.
- The principal has the right to require information from A. This is the case when a principal is either *responsible* for a component or *constructed* a component.
- The principal can sanction the component if it fails to give an account.

The last point is the most difficult to translate into the technical domain because machines cannot be sanctioned, i.e., they feel neither remorse nor pain. Thus, we translate this point to mean that a principal either *constructed* a component and can thus also change the component’s future behavior, access all logs and data, or that a principal is *responsible* for a machine and thus knows about what the machine does and can take some actions. Finally, we formulate the generic definition given by Hall et al. [11] in psychology: A principal is *hall_accountable* for some component if the component’s actions might be evaluated by some principal. This can be expressed by using the *informed* relation defined above. Note that while *hall_accountable* and *lindberg_accountable* focus on the component, *raci_accountable* focuses on the event. This difference stems from the different perspective of the underlying theories, i.e., social theories focus on the individual and thus

on the component, and RACI focuses on events in an organization. Another noteworthy point is that `raci-` and `lindberg_accountable` consider only one principal for a component, whereas `hall_accountable` is a set.

F. State Space

A cyber-physical system (CPS) is a collection of components and may have a log file (multiple log files should be aggregated into a single logical account). A CPS will naturally be able to perform actions that can affect its surroundings. We decided not to model these actions explicitly because obtaining such a list a priori is typically impossible, having a list of potential actions is not immediately useful, and all actions taken by the CPS should be reflected in the log file. Furthermore, each CPS has some associated principals and all of its components require some configuration.

CPS
$system : \mathbb{P} \text{Component}$ $logs : \mathbb{P} \text{Observation}$ $principals : \mathbb{P} \text{Principal}$ $setups : \mathbb{P} \text{ComponentConfiguration}$
$system = ran(dom(logs))$ $system \neq \emptyset \wedge principals \neq \emptyset \wedge setups \neq \emptyset$ $ran(setups) \subseteq principals \wedge system = dom(setups)$

Typically CPS are not considered on their own, i.e., they are considered as part of a larger socio-technical system (STS) that encompasses the CPS and its surroundings. In our model, an STS consists of the `ego_system`, which is the system whose point of view we consider, and `foreign_cps`, i.e., other CPSs in the universe of discourse. We model them as a sequence, which implies that any `foreign_cps` will have some form of unique ID. Furthermore, it includes principals, of which the principals of the `ego_system` and the `foreign_cps` are a subset, as well as other Beings that may affect the technical systems.

STS
$ego_system : \text{CPS}$ $foreign_cps : seq \text{CPS}$ $principals : \mathbb{P} \text{Principal}$ $beings : \mathbb{P} \text{Being}$
$ego_system \notin ran(foreign_cps)$ $ego_system.principals \subseteq principals$ $\forall c : ran(foreign_cps) \bullet c.principals \subseteq principals$

An `AccountabilityMechanism` is constructed over an STS and extends it with abilities to log events and reason about them. It contains the STS, `Events` that can be observed by principals, `Observations`, i.e., events observed by principals, `Accounts` that contain a list of all observations by principals, external sources or CPSs, `knownAccounts`, i.e., a list of accounts a principal knows about and can thus use for reasoning, `directCause`, which provides a list of components that caused some event, and `correctionActions`, i.e., the actions that can be taken by principals to prevent a CPS from doing something. In addition, `missedByEgo` contains all events recorded somewhere but which are not known to the `ego_system`. This set should be as small as

possible because not sensing an event often leads to errors or unexpected behaviors.

AccountabilityMechanism
STS $events : \mathbb{P} \text{Event}$ $observations : \mathbb{P} \text{Observation}$ $accounts : \mathbb{P} \text{Account}$ $knownAccounts : \mathbb{P} \text{hasAccount}$ $directCause : \mathbb{P} \text{caused}$ $correctionActions : \mathbb{P} \text{correctionAction}$ $missedByEgo : \mathbb{P} \text{Event}$
$ran(ego_system.logs) \subseteq accounts$ $\forall c : ran(foreign_cps) \bullet ran(c.logs) \subseteq accounts$ $dom(hasAccount) \subseteq accounts$ $dom(knownAccounts) \subseteq accounts$ $missedByEgo = events \setminus dom(dom(ego_system.logs))$

IV. APPLYING THE MODEL

A. Example

Here, we show how our model can help clarify accidents, such as the previously mentioned deadly crash of an autonomous vehicle operated by Uber. At the time of writing, the official investigation was still on going, and we do not intend in any way to second guess its results. The goal of this example is to show how difficult it is to clearly state what “accountable” means and capture its impact on the system design. To that end, we base our example on the Uber accident and fill any gaps in real system data with assumptions. To keep the example concise, we limit the number of components, principals, and other elements. Note that a real system would be significantly more complex than this example. Furthermore, we do not claim that our understanding of the state space is complete. The example illustrates how modeling allows us to be precise in understanding accountability. As notation, we use a pseudo Z syntax that uses state spaces to show the potential values of the given sets and axioms. These values, particularly those for the accountability relation or even `caused`, do not need to be provided; however, they can be computed (e.g., [14] for causality). In this example, we focus on two questions: (1) “Is Uber or the safety driver accountable?” and (2) “Did it matter if the LIDAR worked?”. The first question is a classic question when discussing cooperative systems, and the second questions assumes that a working LIDAR, unimpaired by light conditions, could have avoided the accident.

B. Realizing the Given Sets

We can define the chassis of the car, the accompanying sensors, its AI control software and manual override as `Components`. The `Account` would encompass system logs, any sensor data, such as the recently released video [2], or even human observation. Note that the `Events` depend on the exact implementation. We assume that processed sensor data, e.g., object detection, or human testimonies, such as “there was a crash” will be such events. Of course all events must be converted to a common format, which is a nontrivial task. Here, the `Principals` are Uber because they programmed, built, and configured the car, and the safety driver, because, here, we assume that she could always intervene and stop the

car. In addition, other companies, like Volvo, who built the chassis, could be the principal for some component. Finally, Actions encompass countermeasures such as “breaking to a full stop,” “swerve around the pedestrian,” or similar maneuvers. Beings include the pedestrian killed in the accident.

C. Implementation-specific Interfaces

An Observation in this context is a log entry about a specific event (e.g., “detect object” or “make a right turn”) or less formal knowledge such as a person seeing something and telling about it. Finding useful `correctionActions` is tricky and depends on what went wrong. Thus this set may only be filled a posteriori. In this example, we are seeking actions that would avoid killing the pedestrian, e.g., “break to a full stop” or “swerve right.” Of course, these high-level actions can be broken down into lower levels. `hasAccount` returns the logs or information that each principal possesses. In this example, it is easiest to prove what the safety driver did and much more difficult to know what Uber did or did not do and, crucially, at what time they knew. For the safety driver, we have her testimony and the video released by the police department. Here, `caused` would be implemented with a reasoning algorithm or can be implemented by manually parsing the log files. Finally, the `ComponentConfiguration` should be done by Uber unless they outsourced some of their setup and configuration tasks. The following state space captures this example.

exampleSTS

STS
`VIDEO, LIDAR, AI, CHASSIS, MANUAL_CTRL` : Component
`DRIVER, UBER, VOLVO` : Principal
`BLACKBOX, VIDEO_FEED, DRIVER_TESTEMONY` : Account
`PEDESTRIAN` : Being

`ego_system.system` = {`VIDEO, LIDAR, USONIC, AI`}
`ego_system.logs` =
 {(`DETECT_PEDESTRIAN, LIDAR`) \mapsto `AI`}
`ego_system.principals` = {`DRIVER, UBER`}
`principals` = `ego_system.principals`
`ego_system.setups` = {`VIDEO` \mapsto `UBER, LIDAR` \mapsto `UBER, USONIC` \mapsto `UBER, AI` \mapsto `UBER, CHASSIS` \mapsto `VOLVO`}
`foreign_cps` = $\langle \rangle$ \wedge `beings` = {`PEDESTRIAN`}

D. Context-independent Axioms

The axioms `informed`, `responsible`, `constructed`, `raci_accountable` and `lindberg_accountable` can be realized on top of the underspecified axioms. If implemented according to the specification, they yield useful and informed results about the accountability within the system.

E. Notions of Accountability

The formal model highlights that `hall_accountable`, `raci_accountable` and `lindberg_accountable` require different implementation-specific interfaces. To illustrate this difference, we first construct a simple `AccountabilityMechanism` state space that has just enough information to tell us which components are `hall_accountable`.

In the first state space, we can infer `hall_accountable` = {`CHASSIS, AI`}, because events relating to these entities are known to some principal. This form of accountability simply requires the `informed` relation, which, in an implementation, means that some form of logging is present. Note that there is no requirement for the form or quality of such logs. It is considered accountable, as long as it is possible for a component to be evaluated by some principal.

exampleAMhall

AccountabilityMechanism
exampleSTS
`DETECT_PEDESTRIAN, HIT_PEDESTRIAN` : Event
`BREAK, SWERVE` : Action

`events` = {`DETECT_PEDESTRIAN, HIT_PEDESTRIAN`}
`observations` =
 {(`HIT_PEDESTRIAN, CHASSIS`) \mapsto `DRIVER_TESTEMONY`,
 (`HIT_PEDESTRIAN, CHASSIS`) \mapsto `VIDEO_FEED`,
 (`DETECT_PEDESTRIAN, LIDAR`) \mapsto `BLACKBOX`}
`accounts` = `ran(ego_system.logs)` \cup {`VIDEO_FEED`}
`knownAccounts` = {`BLACKBOX` \mapsto `UBER`,
`VIDEO_FEED` \mapsto `UBER`,
`DRIVER_TESTEMONY` \mapsto `DRIVER`}
`informed(CHASSIS)` = {`UBER, DRIVER`}
`informed(AI)` = {`UBER`}

The next state space shows that, to determine whether there is a `lindberg_accountable` principle for some component, we also require a mechanism to fill the set `correctionAction`. This is typically performed manually after an accident has occurred. For future systems, such mechanisms could be part of any explanation framework for an AI [15]. In this example, we assume that the driver could have paid better attention and stopped the car in time, and that the AI could have reacted sooner than it did. Here, we can infer `lindberg_accountable(CHASSIS)` = `DRIVER` and `lindberg_accountable(AI)` = `UBER`.

exampleAMlindberg

exampleAMhall

`correctionAction` =
 {(`DRIVER, MANUAL_CTRL`) \mapsto `BREAK`,
 (`UBER, AI`) \mapsto `BREAK`}
`responsible(AI)` = `UBER`
`responsible(CHASSIS)` = `DRIVER`

The final example requires that an even more complex operation, i.e., `caused`, is provided by the system. While currently causal relationships are determined by experts, research in the field of causality suggests that automated reasoning is possible [16]. Here we incorporate the fact that Uber supposedly used too few LIDAR sensors to detect the pedestrian [17]. To reflect this knowledge, we remove `DETECT_PEDESTRIAN` from the system logs. This leads to `missedByEgo` to hold that event. A causal reasoning algorithm can then conclude that the lack of detection led to the collision and identify the AI and the `CHASSIS` as causes. Thus, `raci_accountable(HIT_PEDESTRIAN)` = `UBER` would then point to Uber as the accountable entity.

exampleAMraci
exampleAMlindberg

```
ego_system.logs =
{(HIT_PEDESTRIAN, CHASSIS)  $\mapsto$  BLACKBOX}
events = {DETECT_PEDESTRIAN, HIT_PEDESTRIAN}
missedByEgo = {DETECT_PEDESTRIAN}
directCause = {HIT_PEDESTRIAN  $\mapsto$  {CHASSIS, AI}}
caused(HIT_PEDESTRIAN) = {AI, CHASSIS}
```

F. Discussion

Looking at the above examples, we see that both Uber and the safety driver are accountable for some components. The reason for this ambiguity is that in our model, the safety driver could always avoid the accident by being alert, observing the pedestrian and breaking in time. This tacitly ignores the fact that to avoid HIT_PEDESTRIAN, a principal would first need to detect her. This points us directly to the crux of self-driving cars, i.e., asking humans to monitor a system for hours on end without anything happening, in the hope they will react correctly in the split seconds leading up to an accident is infeasible. Humans, especially people without proper training, will invariably lose focus and their attention will wander. In our example, DETECT_PEDESTRIAN is only observed by the LIDAR, which is therefore the only component that had the option to execute corrective actions. This does not change the attribution of accountability for hall_accountable, but immediately changes lindberg_accountable to exclude the driver because she could not have done anything. raci_accountable still depends on the exact implementation of caused, which should include the new knowledge to show that the driver is not accountable. Generally, our model facilitates the comparison of the state of the world and the system's knowledge of it. Of course, there are many other ways to model the exact circumstances of the accident, as well as many more notions of accountability. However, our goal is not to find the one correct model or definition of accountability. On the contrary, we strongly assume that there can be no single right answer. However, we believe that a precise and formal model to state any assumptions and explicate the notion of accountability used by the developers of a system is useful and necessary. This will allow regulatory bodies to publish their requirements in unambiguous language and make it possible to verify whether a system is compliant or not.

V. CONCLUSIONS

In this paper we illustrated the benefits of a formal model of accountability for cyber-physical systems. Our model allows us to precisely describe the notion of accountability a system should fulfill. Such a formal description enables us to analyze and compare these notions, and facilitates the selection of the correct one for a system, thereby avoiding expensive, but superfluous, subsystems and logging facilities. In an oversimplified case study, we used this model to demonstrate the difference between three widely used notions of accountability and described their impact on the implementation for our case study. One clear area of future improvement is the fact that there are many more notions of accountability in use today,

which we seek to catalog, formalize, and compare. Having a unified view of accountability will help us identify the most suitable notion for specific use cases. Another widely open problem is how to reason about such data. Relations like caused or explanations for AI systems are simple to ask for, but very difficult to realize in real-world systems. Furthermore, using terms like *accountability*, *responsibility* or *causality* creates clear connections to the legal domain. Thus, it remains an open problem to characterize the connection between legal terms, their technical meaning, and their application. Ideally, following a formal model of accountability will provide guarantees of legal compliance.

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