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Request for Information: Development of a 2025 National Artificial Intelligence Research and Development Strategic Plan

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Submitter Information

Organization: Business Software Alliance

General Comment

The Business Software Alliance submits the attached comments in Response to the Request for Information on the development of a National AI R& D Strategic Plan, Docket ID No. NSF-2025-OGC-0001.

Attachments

BSA Comments on RFI on National AI Research and Development Strategic Plan FINAL signed



**Business Software Alliance Comments on the Networking and Information
Technology Research and Development's Request for Information on the
Development of the 2025 National AI Research and Development Strategic Plan**
May 22, 2025

The Business Software Alliance (BSA) appreciates the opportunity to provide input on the Networking and Information Technology Research and Development's Request for Information (RFI) on the Development of the 2025 National AI Research and Development (R&D) Strategic Plan. BSA is the global trade association of the enterprise software industry, representing companies that are leaders in AI, cybersecurity, cloud computing, and other cutting-edge technologies.¹ We work in over 20 markets in the United States, Europe, and Asia, advocating for policies that build trust in technology so that every industry sector and the public can benefit from innovation. As a result, BSA members have unique insights into AI's tremendous potential to spur digital transformation and the policies that can best support the responsible use and adoption of AI.²

President Trump prioritized AI R&D in his first term, and the Administration should build on his previous successes in this area. Indeed, in 2019, President Trump directed federal agencies to promote sustained investment in AI R&D in Executive Order (EO) 13859³ and updated the National AI R&D Strategic Plan to, among other things, identify key topics for future research. He also established the first-ever national AI research institute. In the last few years, there have been several other efforts to build on these efforts, leading to, among other things, the launch of 25 AI research institutes that connect over 500 funded and collaborative institutions across the country and around the world. But there is still more work to do. Global competition on AI has grown, not abated. As a result, we appreciate the Trump Administration's focus on prioritizing continued R&D investment to maintain America's global technological and economic leadership.

¹ BSA's members include: Adobe, Alteryx, Asana, Atlassian, Autodesk, Bentley Systems, Box, Cisco, Cohere, Dassault Systemes, Databricks, Docusign, Dropbox, Elastic, EY, Graphisoft, HubSpot, IBM, Informatica, Kyndryl, MathWorks, Microsoft, Notion, Okta, OpenAI, Oracle, PagerDuty, Palo Alto Networks, Rubrik, Salesforce, SAP, ServiceNow, Shopify Inc., Siemens Industry Software Inc., Trend Micro, TriNet, Workday, Zendesk, and Zoom Communications Inc.

² This document is approved for public dissemination. The document contains no business-proprietary or confidential information. Document contents may be reused by the government in developing the 2025 National AI R&D Strategic Plan and associated documents without attribution.

³ See Executive Order 13859, Maintaining American Leadership in Artificial Intelligence, Feb. 11, 2019, available at <https://www.federalregister.gov/documents/2019/02/14/2019-02544/maintaining-american-leadership-in-artificial-intelligence>.

We highlighted potential ways that the Trump Administration could achieve this goal in our comments on the development of an AI Action Plan, including by enhancing foundational AI research through the National Science Foundation and universities and by fostering investments in AI infrastructure to, among other things, strengthen its resilience and update American connectivity infrastructure to enable use of AI tools.⁴

Notably, we also underscored the importance of the role of open source in advancing AI R&D. Open source has both significant commercial and broader societal benefits. For example, it increases competition in the AI public and private sector marketplace and enhances the diversity of product offerings. It also helps spur trustworthy AI adoption through increased transparency, which enhances accountability and improves security through readily available mechanisms for identification and remediation of vulnerabilities. In addition, open source broadens access to innovative tools that drive further research, such as drug discoveries for critical health conditions.

We reiterate below key measures that the Administration should take to expand AI R&D efforts, including: (1) maintaining a group of personnel focused on advancing AI science; (2) facilitating industry-led development of international AI standards; (3) expanding the National AI Research Resource (NAIRR) pilot project; and (4) continuing international coordination.

- **Recommendation 1: Maintain USG Organization Focused on Advancing AI Science.** Advancing AI science is essential to responsible AI adoption. The AI marketplace needs more scientific research on critical technical issues, including identifying effective measures for evaluating capabilities and risks of both AI models and systems and establishing scientifically valid, systemized AI testing protocols and benchmarks for acceptable outcomes in specific applications. This is important not only for companies aiming to develop responsible AI, but also to their customers, including the public sector, to assure them that AI tools have been designed in ways that are reliable, secure, and function as intended. The AI Safety Institute, housed in the National Institute for Standards and Technology (NIST), currently serves this purpose, and the Administration should maintain a dedicated group of US government personnel who are subject matter experts to focus on technical, AI scientific issues and collaborate with external stakeholders to leverage insights on how potential technical solutions work in practice.
- **Recommendation 2: Facilitate Development of International AI Standards on Key AI-Enabling Issues.** The Administration should facilitate development of industry-led international AI standards, including through supporting and expanding

⁴ See Business Software Alliance, Business Software Alliance Comments on the Networking and Information Technology Research and Development National Coordination Office's Request for Information on an Artificial Intelligence (AI) Action Plan, *available at* <https://www.bsa.org/policy-filings/us-bsa-comments-on-the-networking-and-information-technology-research-and-development-national-coordination-offices-rfi-on-an-ai-action-plan>.

NIST's "zero drafts" project to develop pre-standardization research that lays the foundation for adoption of international AI standards that align with US priorities and insights. Key issues to address include standardized transparency documentation, testing and evaluation of AI systems in specific applications, and adoption of existing open technical standards for digital content provenance. These international standards provide several benefits to American companies, including increasing competition by enabling small businesses to leverage common standards, global interoperability by establishing standards that can be used across jurisdictions, lowering the barriers of entry into global markets for American companies, and providing a common baseline for responsible AI development and assurance that spurs increased AI adoption.

- **Recommendation 3: Expand the NAIRR.** President Trump's EO13859 also recognized the importance of increasing access to key resources, including data, necessary to conduct AI research. The RFI also identifies "infrastructure support for the AI research and development community" as a possible area of focus for the AI R&D strategic plan. The National AI Initiative Act of 2020, which Congress enacted at the end of President Trump's first term, directed the creation of a NAIRR Task Force to explore the feasibility of creating a shared national research infrastructure for educators and researchers to access the necessary computational, data, and other resources to accelerate research and innovation. As a result of the implementation of these efforts, which began during President Trump's first term, a pilot program for the NAIRR now exists, which is a small, but necessary, step toward broadening access to critical resources that enable a broader range of people with varied expertise and perspectives to develop more robust, comprehensive solutions.

Despite this progress, the NAIRR pilot program is limited in scope and impact. The Administration should expand the program to transition it to a fully developed, permanent US government initiative with a broader scope, more participants, and sufficient funding. The potential for the shared research infrastructure to provide technological breakthroughs is immense, enabling discoveries that enhance application across industry sectors, stimulating broad-based economic growth, and acceleration of research in other areas, including engineering and other scientific fields powering American innovation. The Trump Administration should seize the opportunity to amplify this effort by expanding the NAIRR pilot project.⁵

⁵ See Gary Drenik, Forbes, How AI Is Accelerating Innovation in Research and Development, June 18, 2024, available at <https://www.forbes.com/sites/garydrenik/2024/06/18/how-ai-is-accelerating-innovation-in-research-and-development/>. In addition, one project, NAIRR Secure, is exploring new mechanisms to combine sensitive data in ways that preserve privacy and security, a critical step in increasing the breadth and utility of data that can fuel more groundbreaking AI insights, such as advancing precision medicine to improve healthcare.

- **Recommendation 4: Continue International Coordination on AI Research.**

The proliferation of international AI safety initiatives, such as foreign AI Safety Institutes and the United Nations' development of an international AI scientific panel, strengthen the imperative not only to deepen AI scientific research in the United States, but also to lead the global conversations with other technical experts on similar efforts to advance trustworthy AI development and use, including on key priorities for sharing AI-specific security threats among government and industry stakeholders. Ensuring that related global efforts align with US insights is paramount. As a result, the Trump Administration should facilitate international coordination on AI R&D, enabling America to lead the world on the future of AI. Indeed, this is necessary to "ensure that American AI technology continues to be the gold standard worldwide," as Vice President Vance outlined in his recent remarks at the Paris AI Action Summit, spur continued innovation fueling America's economic growth, and protect our national security, including from threats by foreign adversaries who exploit foreign AI models developed without robust testing protocols established by US researchers.

The importance of US investment in AI R&D cannot be overstated. Scientific breakthroughs in AI are a catalyst for continued American innovation and economic growth. We look forward to working with the Trump Administration on developing and implementing a national strategic plan that advances this important effort.

Sincerely,

Shaundra Watson
Senior Director, Policy