

# PUBLIC SUBMISSION

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**Comment On:** NSF-2025-OGC-0001-0001  
Request for Information: Development of a 2025 National Artificial Intelligence Research and Development Strategic Plan

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## Submitter Information

**Organization:** Palantir Technologies

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## General Comment

See attached file(s) for Palantir's response to this RFI.

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## Attachments

Palantir RFI Response\_AI RD National Plan\_final

May 29, 2025

Greetings,

We applaud OSTP, NITRD, and NCO's efforts to redraft the National Artificial Intelligence Research and Development Strategic Plan so that the United States is best positioned to drive historic innovations in Artificial Intelligence. We feel that in updating the AI R&D plan, it is necessary that focus be broadly shifted away from the amorphous and misguided aim to win an ill-defined race to achieve Artificial General Intelligence, and towards building the core requirements of effective AI implementation that reaffirms the primacy of American values through practice and by example. We believe this will lay a fertile foundation for innovation and dynamism.

Crucially, a clearer strategy and theory of victory in the AI Race with the People's Republic of China ought to be established so that the AI R&D plan can be better integrated. In particular, we feel that victory will not be achieved by the nation whose government drives the most cutting-edge breakthroughs, nor will it be won by the nation that constructs the most comprehensive regulatory structures to govern AI. Rather, it will be our speed at building AI systems that can generate demonstrable advantages and deploy them effectively in real world settings. The federal government can play a key role in this effort by driving risk mitigation efforts and safety frameworks that are voluntary or required, depending on risk levels and other domain and contextual factors, as well as pivoting away from needlessly onerous regulatory approaches that discourage dynamism. This should be the framework that governs America's AI competition with the Chinese Communist Party.

We have kept our edits to the executive summary level, offering what we feel are the best starting points to refocus the federal government's priorities in funding AI R&D. Palantir stands ready to assist further in this effort.

To drive innovation and encourage widespread AI adoption, we feel the enumerated strategies in the original plan can be adapted and changed to the following:

### **Strategy 1: Accelerate Advances in Applied AI to Drive U.S. Economic Growth**

To position the United States as the global leader in AI, the federal government should include core investments in AI implementation infrastructure and frameworks in addition to investments in fundamental AI R&D. Investing in AI implementation will further broaden AI R&D goals by driving innovation that directly solves real world problems, as well as indirectly through revealing limitations in current AI capabilities - pointing researchers where further basic R&D investments need to be made.

To achieve this, the federal government can prioritize tax credits and favorable regulatory structures in applied AI research and infrastructure that enable rapid adoption across manufacturing, energy, healthcare, education, and defense. This includes user-friendly AI tools, scalable deployment platforms, and cost-effective hardware to make AI accessible to businesses of all sizes. Efforts should focus on streamlining AI integration into existing workflows, reducing adoption barriers, and ensuring innovations drive job creation and economic competitiveness with minimal regulatory burdens.

Efforts the federal government could effectuate to pursue this strategy include tax credits for AI Integration in manufacturing, AI Deployment grants targeting the healthcare sector, and expanding support for Department of Defense programs, like Project Maven, that deploy AI in ways that increase efficiency and precision targeting across the military.

### **Strategy 2: Ensure Secure and Reliable AI Systems for Nationwide Deployment**

Advance applied R&D to design AI systems that are secure, reliable, and ready for widespread use in critical sectors like defense, infrastructure, and healthcare. This includes deploying tools to test and validate AI performance, protect against cybersecurity threats, and ensure resilience in real-world applications. Research should support rapid deployment of secure AI solutions, particularly to counter foreign threats and maintain U.S. dominance in strategic technology applications.

Crucially, the new strategy should go beyond its predecessor's necessary but-insufficient-focus on benchmarking and standards (previously Strategy 6) to an emphasis on deployable frameworks for robust testing, validation, evaluation, monitoring, and maintenance of AI systems. Many such techniques already exist and are proven to work effectively to mitigate the concrete risks and challenges that tend to limit AI adoption, but remain underutilized by organizations that have not made adequate investments in the AI deployment infrastructure needed to carry out these supporting functions.

### **Strategy 3: Develop Shared Resources to Enable AI Access and Adoption**

Create and provide access to shared datasets, cloud-based AI platforms, and testing environments to lower barriers for businesses, startups, and communities adopting AI. These resources should support practical AI applications, enabling small and medium-sized enterprises to compete globally. By prioritizing American users and fostering a diverse ecosystem, these efforts will accelerate AI adoption, drive innovation, and enhance U.S. economic competitiveness. The proposed National Artificial Intelligence Research Resource is one excellent example of a tool that could help deliver against this objective.

Another compelling example is the National Clinical Cohort Collaborative (N3C), managed by the National Center for Advancing Translational Sciences (NCATS) at the National Institutes of Health. N3C is the nation's largest secure database of de-identified electronic health records, empowering researchers at academic medical centers nationwide to conduct large-scale, collaborative research on high-priority diseases such as Alzheimer's, dementia, cancer, and renal disease. Critically, N3C is offered to all institutions within the Clinical and Translational Science Awards (CTSA) program, ensuring that even smaller or less-resourced academic medical centers can access this state-of-the-art, AI-enabled research tool. N3C provides a real-world example of how a federally supported, shared data platform can broaden access to advanced AI tools, reduce redundant infrastructure costs, and accelerate biomedical research and innovation.

Finally, we recommend standing up agency-specific AI testbeds, where the federal government's vast data holdings can be leveraged to provide commercial AI companies and researchers with secure access to relevant datasets and associated agency needs for developing and testing AI applications.

#### **Strategy 4: Establish Industry-Led Standards to Facilitate AI Deployment**

While the federal government should avoid burdensome regulatory frameworks that dampen America's innovative spirit and discourage dynamism, it can play a critical role by convening major stakeholders to form practical sets of voluntary standards, then leveraging its authority to ensure these voluntary frameworks are broadly adopted.

This can be achieved by supporting the development of practical, industry-driven standards, benchmarks, and testing strategies to streamline AI adoption across sectors. These standards and strategies should focus on interoperability, reliability, and user-friendliness, enabling businesses to integrate AI quickly and efficiently. Efforts should avoid bureaucratic frameworks that seek to over-engineer approaches and requirements, emphasizing voluntary guidelines that promote trust, scalability, and global market leadership for U.S.-developed AI technologies. Research should also explore how AI can help address critical societal challenges, such as improving healthcare access or education, to drive adoption in communities and strengthen U.S. leadership.

#### **Strategy 5: Build an AI-Ready Workforce to Spur Widespread Adoption**

The disruption the AI revolution will bring to workforce sectors can be mitigated, but only if local, state, and federal governments begin investing in the American people now. At minimum, investments in educational and training programs that prepare American workers at all levels of society for this fundamental shift are necessary to avoid the emergence of large skill gaps and employment shortfalls. If done well, such programs can also help to alleviate public fears and unwarranted backlash by emphasizing characteristics of AI transformation that further elevate worker productivity, abilities, and pride in the fruits of their labor.

To do this, the federal government can work with schools and state governments to develop AI literacy courses and vocational training for AI integration. Efforts should prioritize the funding of regional training hubs - particularly those regions most likely to be focal points for reindustrialization and data center construction.

#### **Strategy 6: Promote Human-AI Collaboration for Broad Workforce Integration**

Just as we should focus on investing in the future America's workforce, attention should also be paid to upskilling America's workforce right now. To do this, the federal government should advance applied research and development to create AI systems and training programs that enhance productivity and may be readily adopted in workplaces nationwide.

This includes creating grants focused on projects that build intuitive human-AI interfaces, developing assessment strategies that help to model and evaluate desired enhancements and improved outcomes in real-world settings, and incentivizing the creation of retraining programs for workers potentially impacted by automation. Efforts should prioritize industry-led solutions to build trust in AI and mitigate misuse, ensuring human-AI collaboration boosts economic output and supports American workers without excessively focusing on pro forma compliance requirements.

### **Strategy 7: Expand Public-Private Partnerships to Scale AI Adoption**

Promote public-private partnerships to accelerate the deployment of AI technologies, focusing on practical applications that benefit American businesses and communities. Collaborate with industry, startups, and regional innovators to create AI adoption hubs, supported by tax incentives and streamlined funding. These partnerships should prioritize rapid market entry, economic growth, and U.S. technological dominance, leveraging private-sector expertise to drive nationwide AI integration.

Such partnerships can begin in the nation's tech corridors in Silicon Valley, New York, Denver, and Austin - but need not be limited to major metropolitan regions. Major agricultural organizations across the nation's Midwest, for instance, would be excellent partners for such programs with an agricultural focus.

### **Strategy 8: Establish U.S. Leadership in Global AI Adoption Push**

Establish U.S. leadership in global AI adoption by promoting American AI technologies, supporting infrastructure, and proven testing and evaluation approaches in international markets. Strategic collaborations should focus on deploying AI to address global challenges like cybersecurity, trade, and manufacturing, while prioritizing U.S. economic and security interests. Efforts should counter foreign dominance, attract international investment to U.S. AI ecosystems, and ensure global adoption of AI in ways that reflect American values, strengthen U.S. competitiveness, and secure U.S. interests.

The administration's efforts thus far to develop meaningful partnerships between the United States and its partners and allies offer a compelling model for how the United States should continue to leverage its advantages in AI to create a global system that challenges the Chinese Communist Party's strategic goals. Japan, South Korea, the Philippines, India, and Australia would all be excellent partners for continued efforts in the Indo-Pacific, ensuring U.S. interests are secure in this vital region of the world. Where practical, similar efforts should also be considered with like-minded partners in our own hemisphere.