

PUBLIC SUBMISSION

Received: May 29, 2025 Tracking No. mb9-sekz-tweu Comments Due: May 28, 2025 Submission Type: API
--

Docket: NSF-2025-OGC-0001
NITRD_FRDOC_0001

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

Document: NSF-2025-OGC-0001-DRAFT-0245
Comment on FR Doc # 2025-07332

Submitter Information

Organization: Wiley

General Comment

Please see Wiley's attached submission.

Attachments

Wiley Response to U.S. AI RD Strategic Plan



May 29, 2025

Subject: National Artificial Intelligence Research and Development Strategic Plan

We appreciate this important mechanism to provide our feedback in response to the National Science Foundation's (NSF) Request for Information regarding the Development of an Artificial Intelligence Research and Development Strategic Plan. This process represents a critical step in creating a balanced framework that harnesses the benefits of AI while ensuring trusted, reliable, and accurate output in tandem with robust copyright protections for the creative and research ecosystems.

Founded in 1807, Wiley is one of the world's largest publishers and a global leader in research and learning. As stewards of knowledge and information for over two centuries, we see artificial intelligence as a transformative force capable of driving innovation, unlocking new opportunities, and accelerating progress across industries. When developed and applied responsibly, AI has the potential to enhance efficiency, empower creators, and deliver significant value to businesses and society. By fostering collaboration between stakeholders, we can ensure AI becomes a catalyst for American growth and discovery.

It is our firm belief that in order to be truly effective, any Strategic Plan that seeks to promote research and development should:

- Require transparency and accountability from AI developers to ensure their legal compliance, support accuracy, and reduce the potential for erroneous output; and
- Respect existing intellectual property protections and require the use of proper licensing for copyrighted materials in the training of AI language models.

A framework that upholds intellectual property rights, transparency, and fair compensation reinforces the foundational principles that drive innovation and creativity in the United States. By promoting responsible AI practices that align with these values, policymakers and industry leaders can enable technological progress while advancing accuracy –without sacrificing intellectual property protection. Establishing mutually beneficial licensing arrangements, fostering collaboration to stay ahead of AI advancements, and proactively managing risks while seizing opportunities will be essential to sustaining a thriving and competitive AI ecosystem in America. We look forward to working with the United States on these rapidly emergent issues.

Please find our complete response provided on the following page. We remain available for any further clarification or discussion as needed.

Sincerely,

Deirdre Silver
Executive Vice President, General Counsel
Wiley

Federal Priorities for AI R&D

The federal government should direct R&D resources toward under-addressed but essential areas that advance responsible, legally compliant AI development:

- **Transparent and auditable training practices:** Publicly funded research should develop tools and standards for disclosing training datasets, tracking data provenance, and embedding metadata, including digital identifiers such as DOIs and ISBNs, across AI development pipelines.
- **Legally compliant content usage in AI models:** Research should support infrastructure that enables licensed, permissioned use of protected content. This includes registries, contractual frameworks, and technical systems that help AI developers demonstrate they are not training on unauthorized or infringing materials.
- **Clear differentiation between TDM and AI training:** Unlike TDM, which typically extracts insights without replicating content, AI model training can generate outputs that mirror or reproduce protected works. Federal support is needed to further delineate these uses in technical and legal terms and ensure copyright protections remain robust.
- **Safeguarding research integrity and knowledge quality:** AI-generated outputs in scholarly and educational contexts must be trustworthy. Government investment should support tools that embed attribution, enforce provenance, and align AI use with academic and editorial standards.

Prohibited Approaches: Fair Use and Opt-Out Models

The federal government should reject the notion that fair use, text data mining (TDM) exceptions, or opt-out systems are appropriate for training large language models. These approaches shift the burden of enforcement onto rightsholders and risk legitimizing the use of protected works without consent. Instead, federal investment should prioritize:

- **Supporting licensing-based frameworks:** Lawful, mutually beneficial use of content must be based on consent and compensation, not legal uncertainty or ambiguity.
- **Encouraging the development of transparent, scalable licensing marketplaces:** Collaborative efforts between industry, government, and content creators can support the lawful training of AI while respecting intellectual property.
- **Advancing auditing and enforcement tools:** Federal R&D support is needed to create mechanisms that detect and deter unauthorized data use, especially in cases where models ingest vast amounts of third-party content.

Public-Private Collaborations

The federal government should create durable public-private frameworks that align commercial innovation with the public interest:

- **Trusted licensing collaboratives:** Establish consortia among research institutions, publishers, and AI developers to pilot content-sharing platforms that reward creators and ensure lawful AI training.
- **AI transparency toolkits:** Invest in infrastructure that enables dataset disclosure, automated attribution, and content traceability at all stages of AI development and deployment.
- **Research-backed IP compliance infrastructure:** Fund academic and nonprofit research to prototype standards for provenance tracking, watermarking, citation, and content integrity enforcement in AI systems.

Conclusion

As with any new technology, we must be both visionary and vigilant. Wiley stands ready to support the United States in shaping a strategic AI R&D framework that upholds the rule of law, protects public trust, and advances responsible technology development through licensing-based partnerships. We urge NSF to advance the systems, standards, and incentives that ensure AI innovation and the creative economy grow together, not at each other's expense. We look forward to working with the United States on these rapidly emergent issues.