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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: Planet Labs PBC

General Comment

See attached file(s)

Attachments

Planet US AI RD Strategic Plan Comments FINAL 5 29 25

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Submitted via Regulations.gov

Faisal D'Souza
Networking and Information
Technology Research and Development
National Coordination Office
National Science Foundation
2415 Eisenhower Avenue
Alexandria, VA 22314, USA

Re: Request for Information on the Development of a 2025 National Artificial Intelligence (AI) Research and Development (R&D) Strategic Plan, Docket ID No. NSF–2025–OGC–0001

Dear Mr. D'Souza:

Planet Planet Labs PBC (Planet) appreciates the opportunity to provide further comments on how the National Artificial Intelligence (AI) Research and Development (R&D) Strategic Plan should be rewritten to enable the United States to be the global leader in AI R&D.[1] As a leading provider of global, daily satellite imagery and geospatial solutions, Planet leverages AI and machine learning to help customers derive value and insights from the terabytes of data our satellites produce daily. Our mission is to image the world every day and make change visible, accessible, and actionable.

The previous National AI R&D Strategic Plan, first published in October 2016 and last updated in 2023, laid out a framework for federal investments in AI

[1] Planet previously commented on the Administration's Request for Information on the Development of an Artificial Intelligence (AI) Action Plan and incorporates those comments by reference here. *See* Letter from Danielle J. Piñeres, Deputy General Counsel & Vice President of Regulatory Affairs & Policy, Planet Labs PBC, to Faisal D'Souza, Networking and Information Technology Research and Development National Coordination Office, National Science Foundation (filed Mar. 14, 2025), https://files.nitrd.gov/90-fr-9088/Planet-Labs-AI-RFI-2025.pdf.

research.[2] While the plan identified key strategic priorities such as long-term investments, human-AI collaboration, and addressing ethical implications, several areas could be strengthened to better support the rapid pace of AI innovation and its application to crucial domains like satellite imagery analytics.

We offer the following recommendations to update the AI R&D Strategic Plan, building upon its strengths and addressing areas for improvement to foster a more dynamic and effective AI R&D ecosystem that benefits both government and commercial entities.

1. Revitalize Applied R&D and Integrate Into All Major U.S. Government Programs

The previous plan highlighted the importance of long-term investments in AI research. However, government procurement processes often hinder the rapid adoption of new technologies like AI by the U.S. Government, and the few rapid-innovation opportunities available are often re-directed to meet emerging mission needs. To address this, we recommend that the U.S. Government:

- Establish dedicated funding lines for basic and applied AI research. A common pitfall is that R&D initiatives are treated as discretionary, except when specifically aligned to large programs like major system acquisitions. The result is that R&D initiatives are often subsumed by more immediate operational needs. Although the U.S. Government must be responsive to emerging challenges and opportunities, stability of these R&D programs is crucial for nurturing long-term, high-risk, high-reward AI research.

- Integrate mandatory "applied research" funding pools within acquisition activities to enable rapid tailoring of mission-ready AI technology and concepts to evaluate and integrate these capabilities in order to meet mission needs, as well as evolve technology and capabilities over the life of a program.

[2] *See National Artificial Intelligence Research and Development Strategic Plan 2023 Update* (May 2023), https://www.nitrd.gov/pubs/National-Artificial-Intelligence-Research-and-Development-Strategic-Plan-2023-Update.pdf.

- Revitalize applied R&D programs like Military Exploitation of Reconnaissance and Intelligence Technology (MERIT) and Tactical Defense Space Reconnaissance (TacDSR), which allowed military services to nominate, sponsor, and down-select mission-ready concepts that meet stated mission needs.

2. Re-evaluate Regulatory Barriers to AI Development and Operationalization

The prior AI R&D plan recognized the need to understand and address ethical, legal, and societal implications of AI. However, its emphasis on broad research into these implications could be refined to set the tone for regulatory efforts that are proportionate to risk and do not stifle innovation, particularly in low-risk applications. In particular, the new AI R&D plan should:

- Institute a a light-touch approach on regulating the export of products that utilize AI, focusing controls on the newest, most cutting-edge hardware rather than broadly restricting software, models, or other AI-enabled products. Overly burdensome export controls can hinder U.S. AI development when international competitors are not subject to the same restrictions.

- Specifically, we recommend that any AI developed to process or generate insights not be controlled or restricted at levels higher than how the underlying technology is controlled or restricted. For example, algorithms that generate insights from non-export controlled data should not result in an algorithm or data output that is export controlled.

3. Strategically Invest In and Leverage Government-Aligned AI Model Development

The previous plan underscored the importance of shared public datasets and environments for AI training and testing, and recognized that the government possesses mission-sensitive data unique to its needs. However, a more proactive strategy is needed to develop AI models specifically tailored for government use and security needs. Planet suggests that the U.S. Government:

- Actively pursue opportunities to train, fine-tune, and deploy government-aligned AI models. This includes exploring partnerships with leading AI developers and data set providers (like Planet) to create custom variants of their models deployed to secure government cloud environments. This contrasts with the current tendency in government procurements to place hundreds of millions of dollars in bets on one or two large tech companies that may be building solutions for "old world order" challenges rather than envisioning future needs.

- Establish programs that provide academic and industrial researchers secure and curated testbed environments to conduct research with mission-relevant or sensitive government data. This allows for the development and validation of AI models and experimental methods with real-world, high-value data not otherwise accessible to the broader research community.

4. Enhance Transparency and Improve Governance While Protecting Intellectual Property

The prior AI R&D plan mentioned the need for explainable and transparent AI systems. However, the scope of transparency and governance efforts should be carefully balanced with the scale and pace of AI innovations, the resourcing available to perform oversight and governance, and the success rate of previous attempts within the government to establish AI governance within the intelligence community and Department of Defense. Specifically, the U.S. Government should:

- Ensure that transparency regulations and standards do not require publicly disclosing a level of detail that would expose AI systems to the risk of intellectual property theft or security threats. This balanced approach allows for responsible disclosure without undermining the proprietary nature of cutting-edge AI innovations.

- Ensure that transparency regulations, standards, and/or governance processes are practical and low-cost to implement and a reasonable return on investment for both the government and industry.

- Establish funded programs within governance authorities to facilitate governance and AI validation activities, and set clear measures for success within those programs.

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Planet appreciates the Administration's efforts toward developing a National AI R&D Strategic Plan that promotes American leadership in AI R&D. We look forward to continuing to partner with other companies and governments in advocating and implementing responsible and pro-innovation AI policies.[3]

Respectfully Submitted,

/s/ Danielle J. Piñeres

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[3] 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.