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

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Comment on FR Doc # 2025-07332

Submitter Information

Organization: PhRMA

General Comment

See attached file(s)

Attachments

PhRMA Response to AI Strategic Plan_FINAL

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May 29, 2025

VIA Electronic Filing – *regulations.gov*

National Artificial Intelligence Research and Development Strategic Plan
Attn: Faisal D'Souza
National Coordination Office
2415 Eisenhower Avenue
Alexandria, VA 22314

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

Dear Mr. D'Souza:

The Pharmaceutical Research and Manufacturers of America (PhRMA) represents the country's leading innovative biopharmaceutical research companies, which are laser focused on developing innovative medicines that transform lives and create a healthier world. Together, we are fighting for solutions to ensure patients can access and afford medicines that prevent, treat and cure disease. Over the last decade, PhRMA member companies have invested more than $800 billion in the search for new treatments and cures, and they support nearly five million jobs in the United States.

PhRMA appreciates the opportunity to provide comments in response to the Networking and Information Technology Research and Development (NITRD) National Coordination Office's (NCO) *Request for Information on the Development of a 2025 National Artificial Intelligence (AI) Research and Development (R&D) Strategic Plan.*[1] PhRMA and its member companies stand ready to serve as a resource as this Administration considers policies to leverage AI, and we support the Administration's goals to stay competitive by developing a national research and development strategy on AI. Adoption and use of AI tools can help increase efficiency and promote innovation. However, as the government implements AI tools, it must take necessary steps to safeguard and protect confidential commercial information and trade secret information. PhRMA further recommends that the government, including relevant agencies, provide transparency and an opportunity for stakeholder input around their own adoption and use of AI.

The biopharmaceutical industry is using AI as a tool to help transform drug discovery, development, and manufacturing including by leveraging AI to assist with the discovery of new drug candidates and to enhance manufacturing operations.[2] For this reason, the biopharmaceutical industry is expected to invest more than $3 billion on AI by 2025 globally, a

[1] Request for Information on the Development of a 2025 National Artificial Intelligence (AI) Research and Development (R&D) Strategic Plan, 90 Fed. Reg. 17835 (Apr. 29, 2025), *available at* https://www.govinfo.gov/content/pkg/FR-2025-04-29/pdf/2025-07332.pdf.
[2] PhRMA, *Artificial Intelligence and Biopharmaceutical Innovation* (accessed May 21, 2025) at 5, *available at* https://cdn.aglty.io/phrma/global/blog/import/pdfs/One-pager%20-%20Artificial%20Intelligence%20and%20Biopharmaceutical%20Innovation%20-%20March%202025.pdf.

marked increase from $463 million invested in 2019.[3] This significant investment emphasizes the industry's commitment to utilizing AI as a tool to transform processes throughout the biopharmaceutical supply chain and the promising impact AI will continue to have in getting therapies and cures to Americans faster. It is therefore crucial that policies relating to AI and data protection and related regulatory frameworks evolve in a way that supports innovation. For example, as explained in our submission to the Request for Information on the Development of an AI Action Plan, intellectual property protection is critical to incentivizing the use of AI in R&D.[4]

As the Administration seeks to continually strengthen the nation's AI R&D ecosystem, PhRMA recommends the adoption of the following guidelines around the use of AI, in addition to the response PhRMA previously submitted to the RFI on the Development of an AI Action Plan[5]:

- **Fit-for-Purpose Use of Data:** The Administration should ensure that its agencies utilize data that are fit-for-purpose and rigorously interrogate those data that are input into their AI tools, including for training, as well as their resulting outputs.

- **Legal and Regulatory Frameworks:** The Administration should ensure that legal and regulatory frameworks promote innovation and sustain long-term AI R&D investment. It is crucial for the Administration, to the extent feasible, to develop harmonized AI policies and standards through consensus to avoid conflicting requirements for stakeholders that operate across multiple regulatory domains, while ensuring appropriate protections are in place. Such consistency would mitigate against regulatory uncertainty, delays, unnecessary barriers, and additional costs that could hinder investment in innovation over time.

- **Robust and Transparent Disclosures on Government Use of AI:** While PhRMA is generally aligned with the Administration's commitment to utilizing AI to improve the productivity and performance of government functions, it is imperative that the Administration commit to clearly and conspicuously disclosing to stakeholders how the government will use AI, including how data will be collected, used, and protected. Furthermore, in recognizing AI as a tool, the biopharmaceutical industry believes that human oversight of AI tools and involvement is paramount.

- **Building Trust through Stakeholder Engagement:** PhRMA supports an open and transparent process for stakeholders to provide input on the government's use of AI and encourages the government to create opportunities for consistent and continuous stakeholder

[3] Global Data, *Pharma industry's spending on artificial intelligence could reach over $3 billion by 2025, says GlobalData* (July 7, 2022), *available at* https://www.globaldata.com/media/pharma/pharma-industrys-spending-artificial-intelligence-reach-3-billion-2025-says-globaldata/.
[4] *See* PhRMA Comments, Request for Information on the Development of an Artificial Intelligence Action Plan (Mar. 15, 2025), *available at* https://cdn.aglty.io/phrma/global/resources/import/pdfs/OSTP_AIActionPlanRFI_PhRMAComments_031525.pdf.
[5] *See id*. In addition to the comments submitted herein, we incorporate our prior response by reference, as we understand that the Administration will consider "input in response to this RFI, as well as responses previously submitted to the RFI on the Development of an AI Action Plan (90 FR 9088)" and that these comments "will inform OSTP and NITRD NCO in developing the 2025 National Artificial Intelligence Research and Development Strategic Plan." 90 Fed. Reg. 17835, 17836 (Apr. 29, 2025).

engagement and feedback. Due to the rapidly evolving nature of this technology, guardrails should also be developed in partnership with the private sector to ensure policies are robust, flexible, and reflect the expertise and experience of all relevant stakeholders.

PhRMA appreciates your consideration of these comments. Please contact Jocelyn Ulrich if there is any further information PhRMA can provide or if you have any questions about these comments.

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Sincerely,

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Jocelyn Ulrich
Vice President,
Policy and Research

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