

# 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

**Document:** NSF-2025-OGC-0001-DRAFT-0322  
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## Submitter Information

**Organization:** Software & Information Industry Association (SIIA)

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## General Comment

The Software & Information Industry Association (SIIA) submits the attached comments in response to the request for information on development of a 2025 National AI R&D Strategic Plan.

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## Attachments

SIIA Submission AI RandD RFI



## **Submission of the Software & Information Industry Association (SIIA)**

### **Request for Information on the Development of a 2025 National Artificial Intelligence Research and Development Strategic Plan**

**Docket ID No. NSF-2025-OGC-0001**

**May 29, 2025**

The Software & Information Industry Association (SIIA) appreciates the opportunity to respond to the Request for Information on the Development of a 2025 National Artificial Intelligence (AI) Research and Development (R&D) Strategic Plan (the 2025 Strategic Plan) issued by the Office of Science and Technology Policy (OSTP) and the Networking and Information Technology Research and Development (NITRD) National Coordination Office.<sup>1</sup> SIIA's nearly 400 members, including creators of software and platforms used by millions worldwide, are at the forefront of AI innovation. Our member companies range from global leaders in AI models and applications, companies specializing in data analytics and information services, academic and scientific publishers, education technology companies, and the global financial information and market data community.

We commend OSTP and NITRD for their continued leadership in shaping a cohesive national AI R&D strategy. Federally supported R&D is a fundamental component of continued U.S. leadership in AI and realizing what OSTP Director Michael Kratsios has described as a "Golden Age of Innovation."<sup>2</sup>

We endorse Director Kratsios' focus towards expanding public-private partnerships and exploring "novel funding mechanisms" that will "multiply the impact of targeted federal dollars." Continued leadership in AI requires proactive federal policy to harness the remarkable potential of AI-driven technologies and advance U.S. economic interests while responding to new geopolitical challenges and national security risks. We believe R&D efforts supported by the federal government or undertaken in partnership with the private sector can unlock and supercharge American innovation to advance American national security and economic interests.

The National AI R&D Strategic Plan, as updated in 2019 and 2023, has established a strong foundation by articulating a clear set of strategic priorities that align public-sector research investments with the nation's long-term technological and societal

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<sup>1</sup> National Science Foundation, [RFI on the Development of a 2025 National AI R&D Strategic Plan](https://www.govinfo.gov/content/pkg/FR-2025-04-29/pdf/2025-07332.pdf), 90 Fed. Reg. 81, 17835 (Apr. 29, 2025). <https://www.govinfo.gov/content/pkg/FR-2025-04-29/pdf/2025-07332.pdf>

<sup>2</sup> The White House, [Remarks by Director Kratsios at the National Academy of Sciences](#) (May 19, 2025).

goals. SIIA supports the overarching principles outlined in these previous plans, particularly the emphasis on filling those gaps in foundational research that industry is unlikely to address; advancing measurement science; advancing AI security and reliability; and fostering public-private collaboration. As OSTP builds out the 2025 Strategic Plan, we encourage deliberate efforts to expand federal R&D focus in areas that are unlikely to be fully addressed by industry alone.

Our recommendations for the 2025 Strategic Plan are as follows:

Expand Public-Private Partnerships. Public-private partnerships should be at the forefront of the Strategic Plan. The contours for expanded collaboration are set out in the 2019 and 2023 updates, and include discrete projects, fundamental research, expanding research infrastructure, enhancing workforce, federal prize competitions, and data and model sharing.<sup>3</sup> OSTP and NITRD should move towards operationalizing many of these concepts to tap into the unparalleled capacity of U.S. industry and research institutions to drive innovation forward. As part of this, the Strategic Plan should recommend ways to reduce barriers for small and mid-size companies to partner with federal agencies and research institutions.

Coordinate Public-Private Engagement on R&D. We encourage OSTP and NITRD to designate a central body in the federal government to coordinate public-private engagement on elements of the Strategic Plan. Strengthening cross-agency alignment would help reduce overlap, promote greater interoperability, and create clearer pathways for collaboration. This will also enhance the development and uptake of shared standards and benchmarks, enabling a more cohesive AI ecosystem. By coordinating efforts to engage the broader AI community, the federal government can unlock the full potential of these initiatives—ensuring they work in unison.

Foster R&D through Open Innovation and Research. The federal government must take steps to ensure that the U.S. maintains its advantage over the next decade and beyond. We recommend the Strategic Plan direct steps to promote open innovation and foster research collaboration, including curating and making available government datasets;<sup>4</sup> harnessing the potential of the National Laboratories along the lines of our recommendations for operationalizing the bipartisan FASST

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<sup>3</sup> National Science & Technology Council (NSTC), [National AI R&D Strategic Plan: 2023 Update](#) (May 2023), at Strategy 8; NSTC, [National AI R&D Strategic Plan: 2019 Update](#) (June 2019), at Strategy 8.

<sup>4</sup> NSTC, [National AI R&D Strategic Plan: 2023 Update](#) (May 2023), at Strategy 5; NSTC, [National AI R&D Strategic Plan: 2019 Update](#) (June 2019), at Strategy 5.



initiative;<sup>5</sup> and supporting the adoption, where appropriate, of open-source AI models.<sup>6</sup> In addition, we recommend the U.S. government launch a program to facilitate access to compute for early-stage companies and government and institutional researchers. While SIIA has in the past endorsed the National AI Research Resource,<sup>7</sup> we recognize that there are multiple ways to address this challenge. We encourage creative solutions that draw on commercial cloud innovations (such as multi-cloud and hybrid-cloud environments) and emerging compute allocation and exchange models.

Invest in Measurement Science. The adoption of standards, testbeds, and benchmarks for assessing AI models is essential to build trust, reliability, and security that will accelerate adoption of U.S. AI technologies by consumers, governments, and businesses worldwide. To achieve this and realize the Gold Standard vision for science set forth by Director Kratsios and President Trump,<sup>8</sup> the Strategic Plan should prioritize the continued development of AI measurement science at NIST. Our members believe that NIST, as a science-driven and non-regulatory agency, serves an important role in the AI ecosystem and has collaborated constructively with industry as the AI field has grown. Metrology and standards development were core to both the 2019 and 2023 updates to the Strategic Plan, and we urge OSTP and NITRD to maintain those broad recommendations and expand them to address recent advancements.<sup>9</sup> Investing in NIST, with a goal of making NIST's work in AI the "gold standard" it is in cybersecurity—to quote Secretary Lutnick—will yield dividends in terms of shaping the direction of global innovation and encouraging adoption of U.S. technology.<sup>10</sup>

Advance Frontier Model Security Testing and International Coordination. Further to the above, it is imperative that the United States lead in establishing recognized

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<sup>5</sup> S.4664, [Department of Energy AI Act](#) (118<sup>th</sup> Cong.); SIIA, [Comments on Department of Energy Request for Information on Frontiers in AI for Science, Security, and Technology \(FAAST\) Initiative](#), (Nov. 11 2024).

<sup>6</sup> National Telecommunications & Information Administration, [Dual-Use Foundation Models with Widely Available Model Weights](#) (Jul. 2024); SIIA, [Response to NTIA's Request for Comment Regarding Dual Use Foundation Artificial Intelligence Models and Widely Available Model Weights](#) (Mar. 27, 2024).

<sup>7</sup> National Artificial Intelligence Research Resource (NAIRR) Task Force, [Strengthening and Democratizing the U.S. Artificial Intelligence Ecosystem](#) (Jan. 2023); SIIA, [RFI Response: NAIRR Interim Report](#), (Jul. 7, 2022).

<sup>8</sup> The White House, [Executive Order: Restoring Gold Standard Science](#) (May 23, 2025); the White House, [Remarks by Director Kratsios at the National Academy of Sciences](#) (May 19, 2025).

<sup>9</sup> NSTC, [National AI R&D Strategic Plan: 2023 Update](#) (May 2023), at Strategy 6; NSTC, [National AI R&D Strategic Plan: 2019 Update](#) (June 2019), at Strategy 6.

<sup>10</sup> SIIA, [AI Action Plan Submission](#) (Mar. 14, 2025).



standards and testing protocols that can serve as the basis for international alignment. Without such leadership, there is a growing concern from industry that foreign governments may impose their own security requirements on U.S.-developed AI systems, regardless of whether those systems meet U.S.-endorsed standards. In the absence of mutual recognition of a “home testing” principle, this could restrict U.S. firms’ access to global markets or favor foreign models—undermining innovation, competitiveness, and the broader AI ecosystem.<sup>11</sup>

SIIA has supported proposals from the 118th Congress—including S. 4178, the Future of AI Innovation Act, and H.R. 9497, the AI Advancement and Reliability Act—to establish a centralized federal entity focused on AI security, especially for frontier models. The Chair and Ranking Member of the House Select Committee on China recently stated in a letter to Secretary Lutnick that the AI Safety Institute has a critical role for national security and combatting threats from China, given the institute’s “unique technical expertise, strong partnerships with industry, and experience in testing and evaluations.” We recommend that the 2025 Strategic Plan call for establishing a body with clear authority to coordinate testing, partner with industry, and engage internationally. This is essential not only to advance rigorous, science-based R&D in AI safety and security, but also to prevent the development of a fragmented domestic regulatory landscape that would hinder innovation, increase compliance costs and barriers to entry, and open the door to dozens of varied state-level requirements that lack consistency from state to state.

Advance Privacy-Preserving Data Sharing and Analytics. The class of technologies and methods commonly referred to as privacy enhancing technologies (PETs) possess enormous potential to enable productive data use and AI development while ensuring security, maintaining privacy, and complying with a range of often conflicting rules and regulations in the United States and across borders. We encourage OSTP and NITRD to draw on the 2023 *National Strategy to Advance Privacy-Preserving Data Sharing and Analytics* to advance adoption of PETs by government and the private sector through use-case based research; development of standards; and education.<sup>12</sup>

Prioritize Energy R&D. The Department of Energy (DOE) and the 17 national laboratories have a critical role in advancing AI-driven scientific discovery and applications given the value of DOE’s datasets and advanced computational resources that DOE has developed. We have previously recommended that DOE’s FASST initiative should include efforts to deploy AI technologies to optimize energy efficiency; developing and optimizing new energy sources, such as nuclear and fusion; advancing electrification and grid transformation; and improving grid resilience. By fostering long-term strategic planning and interagency collaboration

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<sup>11</sup> SIIA, [AI Action Plan Submission](#) (Mar. 14, 2025).

<sup>12</sup> NITRD, [National Strategy to Advance Privacy Preserving Data Sharing and Analytics](#) (Mar. 2023).



that are essential to maintaining U.S. leadership in AI innovation as well as national security, we believe initiatives such as FASST will be important for bolstering U.S. global leadership in AI. We believe further R&D initiatives around AI and energy will require close collaboration between government and industry.

Advance R&D to Support AI in Education. AI has the potential to help personalize learning at scale, assist teachers in identifying and remediating where students need help, and open new pathways for AI engineering and other skills development. By investing in the R&D necessary to improve the efficacy of AI in education and workforce training, the U.S. can both cultivate the next generation of AI leaders and users, leverage AI to increase learning access and success, and ensure that our workforce can adapt to AI-driven changes and drive productivity and growth. In addition to recommendations made in a separate submission SIIA has joined,<sup>13</sup> we recommend as follows:

- Prioritize Education Data Science. We encourage OSTP and NITRD to emphasize the need for further R&D to unlock the transformative power of AI to achieve educational objectives and ready the workforce of tomorrow. Data collection, data analysis, and evidence-based research are fundamental to the efficacy and reliability of AI technologies in this space. The Strategic Plan should emphasize educational data science and the essential work that has been undertaken by the Institute for Education Sciences.
- Convene Experts to Coordinate R&D. The federal government has a unique ability to convene research experts and encourage and facilitate adoption at the state and local level across agencies, education institutions, and education and training programs and providers. OSTP can promote cross-sector AI investment by prioritizing basic foundational research and highlighting exemplars, findings, and evidence-based learning of the use of AI. Federally funded foundational R&D is well-suited to deliver data resources on a national scale by helping the sector to address questions and concerns to help enhance learning outcomes for students and the workforce.

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We appreciate the Administration's commitment to American AI leadership and stand ready to assist OSTP and NITRD in crafting policies to advance AI R&D and accelerate AI adoption in the United States and globally. Please direct inquiries to Paul Lekas, Senior Vice President for Global Public Policy and Bethany Abbate, Manager for AI Policy.

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<sup>13</sup> See Response of the EDSAFE AI Alliance to the 2025 Strategic Plan RFI (May 29, 2025).

