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March 15, 2025

AI Action Plan
Attn: Faisal D'Souza, NCO
2415 Eisenhower Avenue, Alexandria, VA 22314

Re: Comments on the Development of an Artificial Intelligence (AI) Action Plan

Introduction

Alteryx welcomes the opportunity to provide input to the Office of Science and Technology Policy on the development of an Artificial Intelligence (AI) Action Plan. Alteryx supports the development of policies, guidance, and standards that advance responsible AI adoption and support the innovation of companies, like ours, that place powerful, customized AI tools into the hands of enterprises and individuals to solve real-world problems and increase productivity.

Alteryx is a leading global provider of data science and analytics automation software with headquarters in Irvine, California. The Alteryx AI Platform for Enterprise Analytics delivers easy, end-to-end automation of data engineering, analytics, reporting, machine learning, and data science processes, enabling enterprises everywhere to democratize data analytics across their organizations for a broad range of use cases.

Alteryx develops and deploys sophisticated low-code/no-code analytics software, including both desktop and cloud-based offerings, that make advanced analytics and artificial intelligence/machine learning (AI/ML) generated insights available to workers in diverse fields of business and government. Alteryx is also committed to the safe and responsible governance of AI, with all of our AI work governed by our Responsible AI Principles (https://www.alteryx.com/trust/ai-principles). Thus, as an integrator, user, and deployer of responsible AI systems, Alteryx has a significant interest in an AI Action Plan to identify priority policy actions needed to sustain and enhance America's AI dominance, and to ensure that unnecessarily burdensome requirements do not hamper private-sector AI innovation.

As you work to develop the AI Action Plan, we encourage you to address priority policy actions. First, unlocking AI innovation across economic sectors and diverse use cases depends on building necessary AI infrastructure, beginning with the data layer. We encourage near-term policy action to invest in getting the data layer right, including by magnifying efforts within the government to address data challenges and by facilitating such investments in the private sector as well. Second, given the increasing complexity of the AI ecosystem and the rapid evolution of the technology, it is critical that policies accurately characterize roles of key stakeholders. Current understandings of roles and responsibilities must be updated to reflect a more nuanced view of the AI value chain, or else many companies – like ours – will suffer from mistargeted policies.

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Getting the Data Layer Right

To fully leverage the potential of AI to improve the efficiency and effectiveness of government functions, organizations require sufficient infrastructure to support the integration and operation of AI tools. One critical component of that infrastructure is the data layer: the structured and high-quality data necessary to ensure that AI systems can access accurate information, which directly impacts their performance and reliability. Further, utilization of a quality data layer ensures that organizations have the ability to responsibly manage, access, and share that data across stovepipes. Simply put, artificial intelligence is only as good as the data it consumes.

Currently, many organizations – including in government – are rushing to adopt AI without addressing underlying data challenges that will hamper their ability to get the most out of the AI tools they introduce. Such challenges include *data quality* (data is of poor quality and often unstructured); *data access* (organizational barriers and well-intended policies prevent necessary access and sharing); and *data literacy* (organizations often lack an understanding of the potential uses and value of the data they have, or how to best use that data to build and support AI solutions).

The AI Action Plan must address the data layer to truly accelerate AI adoption and spur American innovation. Specifically, the AI Action Plan should prioritize three initiatives to get the data layer right:

(1) ***Invest in data infrastructure.*** The government must invest, first, in digitizing its data, given that enormous volumes of highly valuable data remain in paper form. Moreover, it must invest in technologies that enable the structuring, cleaning, and preparation of that data into usable forms. Agency Chief Data Officers (CDOs) must be empowered and resourced to identify and overcome data quality challenges across US government agencies. Moreover, the government can help encourage private sector organizations to address data quality challenges by placing greater emphasis on the data layer in all relevant AI guidance, standards, and best practices it publishes.

(2) ***Democratize data access.*** More must be done across the government to advance data transparency and accessibility. Data-driven decision-making can happen at the speed of relevance only when data is democratized – when all workers are empowered to become data workers. The AI Action Plan should include an urgent push to establish appropriate policies and guardrails to enable responsible sharing of data inside the government, beginning with CDO-led agency reviews of policies and organizational structures posing obstacles to necessary data access.

(3) ***Promote data literacy.*** As AI is mainstreamed in the government and across industry, the vast majority of workers will become data workers; these workers must be equipped with modern and continuous training—including learning through applied exercises and experimentation—to wrangle and automate data to

solve mission problems. The AI Action Plan should include a major AI literacy push for government workers, based on a foundation of data literacy. Moreover, AI literacy will be critical, not just for government workers, but also for workers across industry. The AI Action Plan should also develop an ambitious AI and data literacy initiative to provide awareness, education, and upskilling to a major portion of the American workforce over the next five years – including through sponsoring grants, public-private collaborations, and similar efforts.

These three priority actions will help the government build a durable foundation, both internally and across industry, for the adoption, innovation, and transformative application of artificial intelligence.

Defining Roles and Responsibilities in an Evolving AI Ecosystem

A second critical priority is to update policy frameworks to more accurately characterize key roles and responsibilities across the AI ecosystem. The AI ecosystem is best understood as a value chain, with multiple organizations potentially contributing to the development and refinement of an AI system that ultimately interacts with an end user. Alteryx occupies a role in the center of this value chain, by training, modifying, and integrating foundation models developed by other organizations into applications that may be used directly by end users, or that may be further refined by other enterprise customers.

To accurately reflect this value chain and to avoid confusion and mistargeted policy or regulatory interventions, current AI policy must be redefined to include a broader set of roles within the AI development chain (*e.g.,* model developers, integrators, application developers, deployers) and delineate their specific obligations to end-users. Greater specificity of roles and responsibilities will help align structural incentives across the board.

Within the AI value chain, developers of foundation models clearly take actions that fundamentally shape any AI system based on that model, and shape the capabilities and risks associated with the model. However, AI application developers or actors who otherwise integrate foundation models into broader systems often take measures – including training the model with new data sets, adjusting model weights, prompt engineering, incorporating privacy and security controls, and creating user interfaces – that also impact the capabilities and risks associated with the model. Before an AI system is deployed to interact with an end user, there may be two, three, or more organizations that modify the original model. US AI policy should explicitly recognize this complexity and establish best practices that take it into account.

The AI Action Plan should prioritize a comprehensive review of AI policies to update roles and responsibilities to include, at minimum, developers, integrators, and deployers. Additional roles may also deserve consideration. The impact of this review will be to avoid confusion or ambiguity within US AI policies that can lead to inappropriate

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mistargeting of policy or regulatory actions, undermining the ability of companies to innovate and collaborate in this arena. Moreover, updating AI policies to more accurately characterize the roles of key stakeholders will set an important paradigm that other policymakers – particularly among US states – can look to, thus avoiding misguided regulations that bog down innovation with compliance obligations that simply cannot be met. Prioritizing this action is essential if the United States is to reach its full potential in AI innovation.

Conclusion

AI technologies offer tremendous potential benefits for our economy, security, government, and society. The US government has a tremendous opportunity to lead the development of policies that help government workers and private industry fully unlock its potential. Alteryx looks forward to working with you to define policies that will empower American innovation and enable users – from governments to businesses to private individuals – to access transformative solutions to real-world challenges. We stand ready for further discussions on the AI Action Plan and the priority policy actions we recommend.

Sincerely,

Tommy Ross
Head of Global Public Policy | ALTERYX