Before the
National Science Foundation and
Office of Science and Technology Policy
Washington, D.C.

In the Matter of	)	
	)	
Request for Information on the	)	Document ID 2025-02305
Development of an Artificial Intelligence (AI)	)	
Action Plan	)	

COMMENTS OF CTIA

March 15, 2025

I. INTRODUCTION

CTIA[1] appreciates the opportunity to provide input to the White House Office of Science and Technology Policy ("OSTP") on its Request for Information regarding the Development of an Artificial Intelligence ("AI") Action Plan ("Action Plan").[2] CTIA applauds OSTP's effort to develop an Action Plan that will sustain and enhance America's AI leadership and promote America's continued prosperity.[3] CTIA likewise supports the government's efforts to ensure that heavy-handed regulatory measures do not needlessly hamper private sector AI innovation.[4]

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[1] CTIA – The Wireless Association® ("CTIA") (www.ctia.org) represents the U.S. wireless communications industry and the companies throughout the mobile ecosystem that enable Americans to lead a 21st century connected life. The association's members include wireless providers, device manufacturers, suppliers as well as apps and content companies. CTIA vigorously advocates at all levels of government for policies that foster continued wireless innovation and investment. CTIA represents a broad diversity of stakeholders, and the specific positions outlined in these comments may not reflect the views of all individual members. The association also coordinates the industry's voluntary best practices, hosts educational events that promote the wireless industry and co-produces the industry's leading wireless tradeshow. CTIA was founded in 1984 and is based in Washington, D.C.

[2] *See Request for Information on the Development of an Artificial Intelligence (AI) Action Plan*, Request for Information, 90 Fed. Reg. 9088 (rel. Feb. 6, 2025) ("OSTP RFI"); *see also Removing Barriers to American Leadership in Artificial Intelligence*, Executive Order, 90 Fed. Reg. 8741 (rel. Jan. 23, 2025).

[3] *See* OSTP RFI.

[4] *See id*.

Artificial intelligence and next generation 5G networks are cornerstone technologies for digital transformation and innovation. 5G and AI are poised to become one of the most impactful partnerships in the history of technology—one that will revolutionize industries and redefine global power dynamics as countries race to build the foundation of the 21st century digital economy. For the United States, maintaining its technological edge in both these technologies must be a strategic imperative. As other countries have recognized, leading in AI increasingly requires the capabilities and infrastructure provided by next-generation 5G technologies, and leading in 5G increasingly requires AI-powered advancements in network efficiency and security. The fates of these two technologies are intertwined.

As we advance into an era defined by widespread availability of AI applications, our nation faces a critical challenge: ensuring sufficient access to wireless spectrum for 5G to support the growing demands from AI applications. Without adequate commercial spectrum allocation available to power the thousands of bandwidth-hungry AI applications, the United States risks losing its edge in the global race for AI leadership. The first step toward AI leadership is identifying additional spectrum resources for 5G technologies.

At the same time, the United States must also reduce hurdles that could slow the pace of AI innovation. Maintaining U.S. leadership will require an AI framework centered on deregulation and the promotion of AI development. As Vice President J.D. Vance explained at a global summit in Paris, the AI future "will be won by building."[5]

Administration leadership is more important than ever in driving AI and spectrum strategies that ensure the United States prevails in global technology competition. Accordingly,

[5] *See* J.D. Vance, Vice President of the United States, Remarks by the Vice President at the Artificial Intelligence Action Summit, Paris, France, The American Presidency Project (Feb. 11, 2025), https://tinyurl.com/yc382rjb.

CTIA offers the following recommendations as the Trump Administration pursues an AI Action Plan:

- Ensure continued U.S. wireless leadership by restoring the Federal Communications Commission's auction authority and replenishing the spectrum pipeline for commercial 5G technologies;
- Establish a uniform, national Action Plan and whole-of-government-approach to AI policy that avoids a patchwork of onerous and conflicting regulations at the federal and state level, including through preemption;
- Promote a deregulatory approach and streamline existing frameworks;
- Endorse policies that preempt state AI laws; and
- As AI evolves and to the extent needed, support policies that embrace a voluntary, flexible, and risk-based approach to AI regulation, accounting for the wide range of AI technologies and use cases.

With these policy principles at the forefront, the Action Plan will allow 5G and AI to flourish and their benefits to be realized by all.

II. THE UNITED STATES SHOULD TAKE STEPS TO SECURE ITS GLOBAL AI LEADERSHIP, WHICH IS CRITICAL TO PRESERVING AMERICA'S ECONOMIC PROSPERITY.

Global U.S. leadership on AI is critical, and the AI Action Plan should prioritize this goal. The Administration has recognized that breakthroughs in fields such as AI "have the potential to reshape the global balance of power, spark entirely new industries, and revolutionize the way we live and work."[6] The Administration recognizes AI's countless revolutionary applications have the potential to drive innovation, creates jobs, and ultimately support long-term U.S. economic prosperity.[7] CTIA agrees that AI promises massive benefits, which the AI Action Plan should seek to encourage rather than stifle. Among other applications, AI is already being used to: (1)

[6] *President's Council of Advisors on Science and Technology*, The White House, (Jan. 23, 2025), https://tinyurl.com/mve5wwdz.

[7] *See* J.D. Vance, Vice President of the United States, Remarks by the Vice President at the Artificial Intelligence Action Summit, Paris, France, The American Presidency Project (Feb. 11, 2025), https://tinyurl.com/yc382rjb.

optimize network performance and efficiency,[8] (2) improve network security by analyzing and detecting fraud,[9] and (3) enhance customer service and customer experiences.[10]

Our country's ability to realize the transformative benefits of AI hinges on our wireless networks. 5G's fast speeds, high bandwidth, and responsive networks are critical for enabling new technologies that will be important for the future economy, including AI. 5G can support AI systems' ability to process and transfer vast amounts of data seamlessly in real time. And, as discussed below, AI technologies have the potential to make our wireless networks even better. Given the transformative potential of AI and its beneficial impacts on Americans and our economy, it is imperative that the United States lead globally on both 5G and AI.

III. THE WIRELESS INDUSTRY IS COMMITTED TO DEPLOYING AI FOR THE BENEFIT OF CONSUMERS.

The U.S. 5G story so far is one of impressive investment, deployment, and usage that has set the stage for leading in AI. 5G was deployed nearly twice as fast as 4G, with 5G networks today covering more than 330 million Americans. The wide availability of 5G is the result of record-breaking private sector investment—more than $190 billion since 2018, the year 5G was launched, and more than $30 billion in 2023 alone. As a result, the wireless industry is America's second largest source of direct investment. These wireless investments have supported millions of jobs, expansion of the U.S. GDP, and U.S. technological dominance on the global stage.

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[8] *See, e.g.*, Sibel Aydogmus Bahadir & Frida Mattsson, *What does my network do when I don't look at it?,* Ericsson (Sept. 22, 2022), https://tinyurl.com/md59jpvu; *Analytics and AI-based automation,* AT&T, https://tinyurl.com/bdf46efk (last visited Mar. 14, 2025).

[9] *See, e.g.,* Jeremy Nunn, *How AI And Machine Learning Help Detect And Prevent Fraud,* Forbes (Nov. 1, 2023), https://tinyurl.com/2rkhvh45.

[10] *See, e.g.*, *Meet Emma, Our Virtual Assistant,* U.S. Citizenship and Immigration Services, https://tinyurl.com/5n73sjvu (last visited Mar. 14, 2025); *AI for Customer Service,* IBM, https://tinyurl.com/5t4dw3u4 (last visited Mar. 14, 2025).

Now, the wireless industry is a critical partner in ensuring the United States leads in AI as well. Beyond the role of 5G networks in AI applications, the wireless industry leverages AI in myriad ways throughout the communications ecosystem to bring new innovative capabilities—and new protections—to consumers. CTIA members use AI technologies to, for example: (i) analyze vast quantities of network data, identify patterns, and predict outcomes to avoid network outages and optimize network operations; (ii) prevent fraud, robocalls, and robotexts; (iii) provide virtual assistance with AI-based natural language processing, customer engagement tools, intelligent routing, interactive voice response, webforms, and bots; (iv) optimize product delivery; (v) optimize network deployments and operations; and (vi) strengthen cybersecurity.

The wireless industry has countless examples of innovative uses of AI technologies that directly benefit consumers. For example, the wireless industry leverages AI to:

- **Optimize Network Management.** T-Mobile has invested in AI-radio access networks, or "AI-RAN," which "will dramatically improve customers' real-world network experiences and ever-growing demand for increased speeds, reduced latency, and increased reliability."[11] The AI-RAN system uses extensive data to optimize network adjustments and predict real-time capacity needs, enhancing overall network performance and user experience.[12]

- **Enhance Customer Offerings.** Verizon has developed a solution with NVIDIA that enables a wide range of applications to run over Verizon's 5G private network with private Mobile Edge Compute, delivering powerful, real-time AI services on premises for enterprise customers.[13]

- **Protect Against Fraudulent Robocalls and Robotexts.** Verizon uses AI technologies to identify and prevent illegal robocalls from harming consumers.[14]

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[11] Press Release, *T-Mobile Announces Technology Partnership with NVIDIA, Ericsson and Nokia to Advance the Future of Mobile Networking with AI at the* Center, T-Mobile (Sept. 18, 2024), https://tinyurl.com/3zkjnftd.

[12] *See id.*

[13] *See* Press Release, *Verizon Collaborates with NVIDIA to Power AI Workloads on 5G Private Networks with Mobile Edge Compute*, Verizon (Dec. 17, 2024), https://tinyurl.com/ynk5rwva.

[14] *See generally* Kate Kutchko, Verizon Business Group, *Using Natural Language Processing to Label Robocalls* (May 7, 2024), https://tinyurl.com/mpr9m9wb.

- **Improve Operational Efficiency.** AT&T's generative AI ("GenAI") assists human workers in making decisions and taking actions, whether it's optimizing its network and code, clamping down on fraud, or helping customer care experts better serve customers.[15]

- **Enable Telecommunications Industry Innovations.** Intel is also driving adoption of AI in 5G with its Xeon 6 system on a chip. The system delivers up to 2.4 times the capacity for RAN workloads with a 70 percent reduction in power consumption, enhancing performance and lowering the total ownership cost.[16]

The wireless industry is also doing its part to ensure American AI leadership through the advancement of global standards. CTIA's members participate in organizations across the wireless ecosystem that lead global standardization processes and develop technical specifications to ensure that communications networks and products are built securely and work together seamlessly. For example, members actively participate in the Alliance for Telecommunications Industry Solutions, which develops technical and operational standards for the information and communications technology industry.[17] Members also participate in the Communications Security, Reliability, and Interoperability Council, which provides recommendations to the Federal Communications Commission ("FCC") to promote the security, reliability, and resiliency of the nation's communications systems.[18]

Finally, the wireless industry is an active participant in efforts to guard against the potential risks of AI technologies. CTIA has worked with the National Institute of Standards and Technology ("NIST") on previous AI standards matters and contributed extensively to the

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[15] *See* Andy Markus, *Autonomous Assistants: The Next Step of the GenAI Revolution to Empower Employees and Serve Customers*, AT&T (July 17, 2024), https://tinyurl.com/cpu4njbx.

[16] *See Intel Xeon 6 Processors*, Intel, https://tinyurl.com/44mff9mv (last visited Mar. 14, 2025).

[17] *See Our Members*, ATIS, https://tinyurl.com/mr483wdz, (last visited Mar. 14, 2025).

[18] *See, Communications Security, Reliability, and Interoperability Council*, FCC, https://tinyurl.com/4v2wttw7, (last visited Mar. 14, 2025).

development of its AI Risk Management Framework ("AI RMF").[19] CTIA and its members appreciate the opportunity for continued collaboration on these important issues.

IV. THE ACTION PLAN SHOULD PROMOTE INVESTMENT IN, AND DEPLOYMENT AND ADOPTION OF, BENEFICIAL AI TECHNOLOGIES.

The Action Plan should prioritize actions that support innovation. Specifically, the AI Action Plan should incorporate the following principles: (i) ensure continued U.S. wireless leadership as necessary for AI leadership; (ii) establish a uniform, national Action Plan that is technology neutral; (iii) promote a deregulatory approach and streamline existing requirements; (iv) establish federal AI policy that preempts state action; and (v) to the extent additional action is needed, embrace a voluntary, flexible, and risk-based approach.

A. Ensure U.S. Wireless Leadership

The challenge we face today as a nation is one of exponentially growing data demands. Americans used 100 trillion megabytes of data in 2023, nearly double the amount used two years ago and the largest single-year increase ever. That demand is expected to triple by 2029—and that is before accounting for the proliferation of new AI applications.

Despite this unprecedented growth, today the United States has no additional spectrum bands in queue for commercial wireless use, particularly in key mid-band spectrum between 3.1-8.4 GHz, and the statutory authority for the FCC to issue spectrum licenses by auction has lapsed. As a result, the United States is experiencing a deficit in full-power, licensed spectrum, particularly when compared to 5G allocations in other leading nations. And here in the U.S., federal agencies hold 12 times more mid-band spectrum than wireless licensees; unlicensed and

[19] *See, e.g.*, Comments of CTIA, NIST AI Risk Management Framework Third Draft (Jan. 9, 2023); Comments of CTIA, NIST AI Risk Management Framework Second Draft and Draft NIST AI Risk Management Framework Playbook (Sept. 29, 2022); Comments of CTIA, NIST AI Risk Management Framework Initial Draft, (Aril 29, 2022); Comments of CTIA, NIST AI Risk Management Framework Concept Paper (Jan. 25, 2022); Comments of CTIA, NIST Artificial Intelligence Risk Management Framework Request for Information (Sept. 15, 2021).

shared use comprises seven times more mid-band spectrum than is available for licensed use. The licensed spectrum shortfall is expected to expand absent swift action to restore FCC auction authority and make additional licensed airwaves available for commercial use. According to the Brattle Group, the U.S. could face a spectrum deficit of 400 megahertz by 2027, and this deficit will have more than tripled to over 1,400 megahertz by 2032.[20]

AI will compound this challenge. The unprecedented growth in artificial intelligence will place extraordinary additional demand on America's wireless infrastructure. A lack of sufficient spectrum to support this growth directly jeopardizes America's ability to maintain its status as the global leader in AI innovation. It means American companies will face significant hurdles in developing and deploying advanced AI applications without adequate bandwidth—potentially forcing key research, development, and deployment efforts overseas where spectrum resources are more readily available.

The solution is identifying additional spectrum—mid-band spectrum, in particular—for 5G and AI technologies. OSTP should support policies that would restore the FCC's auction authority and ensure a pipeline of full-power, licensed mid-band spectrum for 5G and beyond.[21] As CTIA has noted, each additional 100 megahertz of mid-band spectrum licensed for 5G will add over $260 billion to GDP, create 1.5 million new jobs, and generate almost $390 billion in consumer surplus.[22] It is critical to start that effort now, as the time it takes between

[20] *See* Coleman Bazelon and Paroma Sanyal, *How Much Licensed Spectrum is Needed to Meet Future Demands for Network Capacity?*, The Brattle Group, at 3-4, 24 (Apr. 17, 2023) ("Brattle Group April 2023 Report"), https://www.ctia.org/news/how-much-licensed-spectrum-is-needed-to-meet-futuredemands-for-network-capacity.

[21] CTIA has encouraged Congress to continue to explore opportunities to make available spectrum in the lower 3 GHz, 7/8 GHz, and 4 GHz bands for 5G wireless use.

[22] Press Release, *More Licensed, Mid-band Spectrum Will Supercharge Economic Growth*, CTIA, https://tinyurl.com/3j3fpx69 (Jan. 23, 2025).

identification of suitable spectrum and deployment can impede competition on a domestic and global basis.

B. Establish a Uniform, National Action Plan

OSTP should promote a uniform, whole-of-government, and technology-neutral approach to AI. In the absence of a unified framework, AI policies may be fragmented across agencies and among federal, state, and local governments. A whole-of-government approach that recognizes existing federal tools and frameworks that can apply to AI while protecting consumers will avoid agencies claiming overlapping jurisdiction of an issue and implementing contradictory or duplicative policies that create significant confusion for consumers and businesses alike.

The AI Action Plan should also pursue a technology-neutral approach to AI policy. Laws and policies that can be applied uniformly can be more effective at addressing specific harms, regardless of the technology mechanism through which the harm may occur. Technology-neutral policies will best allow innovation to flourish unimpeded by burdensome regulation. In contrast, technology-specific policies run the risk of failing to anticipate future technology changes, particularly in a rapidly changing landscape like AI, and may sweep too broadly, create ambiguities, or inhibit innovation.

For example, under the Biden Administration, the FCC proposed new robocall rules to address AI use, which only risked duplicating the FCC's existing rules and efforts and causing confusion for consumers and callers alike.[23] CTIA supports the FCC's February 2024 *TCPA Declaratory Ruling*, which clarified that existing Telephone Consumer Protection Act ("TCPA") requirements addressing "artificial or prerecorded voice" encompass current AI technologies that

[23] *See Implications of Artificial Intelligence Technologies on Protecting Consumers from Unwanted Robocalls and Robotexts*, CG Docket No. 23-362, Notice of Proposed Rulemaking and Notice of Inquiry, FCC 24-84 (rel. Aug. 8, 2024) ("*Robocall NPRM*").

generate human voices.[24] The *TCPA Declaratory Ruling* established clear guidance on the use of AI in illegal calls, and this has already helped the FCC and industry protect consumers from bad actors. By contrast, the FCC's proposed AI-related robocall rules, which would expand the scope of the TCPA to "AI-generated calls" and subject those calls to specific pre- and on-call disclosure requirements, are overbroad and unnecessary.[25] At best, this proposal would duplicate the progress already made in the *TCPA Declaratory Ruling* to define, among other things, "AI-generated calls." At worst, it risks causing significant and chilling innovative uses of AI that would benefit callers and consumers. This example highlights how a patchwork approach to AI policy can be inefficient and introduce confusion. A fragmented approach could hinder innovation and impede U.S. AI competition and leadership globally—when promoting such goals should be a focus of federal AI policy.[26]

C. Promote a Deregulatory Approach and Streamline Existing Requirements

In developing the Action Plan, OSTP should promote a deregulatory approach. An overly regulatory approach creates unnecessary barriers to innovation without corresponding consumer benefits. Broader legal and regulatory protections apply across technologies, and stifling AI with unnecessary regulation would undermine the Administration's agenda to ensure America's global AI leadership.

The Action Plan should account for, rather than duplicate, existing federal legal and regulatory frameworks that are already able to address AI-related concerns. As a starting point, OSTP should survey existing laws and regulations that may encompass AI and identify

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[24] *Implications of Artificial Intelligence Technologies on Protecting Consumers from Unwanted Robocalls and Robotexts*, Declaratory Ruling, 39 FCC Rcd. 1783 (2024) ("*TCPA Declaratory Ruling*").

[25] *See Robocall NPRM* ¶¶ 10, 14-15.

[26] *See* Comments of CTIA, Request for Information; National Priorities for Artificial Intelligence, Docket ID: OSTP-TECH-2023-0007, at 2 (July 7, 2023), https://tinyurl.com/adwd5mce.

duplicative requirements that can be streamlined or eliminated. The existence of these laws makes burdensome AI-specific regulation unnecessary.

In many cases, industry and government have already, and will continue to, successfully collaborate on AI issues. The Action Plan should promote and leverage these types of activities. If OSTP pursues any policies as part of the Action Plan, it should look to the NIST AI RMF, which was developed at the direction of Congress with robust stakeholder involvement, including from CTIA, and thoughtfully outlines a voluntary, flexible, and risk-based approach to deploying AI in a responsible manner. In fact, NIST's risk-based, with stakeholder input, approach to AI continues today with its request for comment on the Cybersecurity and AI Workshop Concept Paper on which CTIA is also actively engaging.[27]

D. Establish Federal AI Policy That Preempts State Action

OSTP should work with Congress to establish federal AI policy that expressly preempts state AI laws. Innovation will be stymied by the growing patchwork of overlapping, and potentially conflicting, AI policy approaches at the federal level from one sector to another, as well as from state to state. A patchwork of laws and policies increases complexity and compliance costs, which discourages pro-consumer innovation and hinders the development and deployment of new AI tools and use cases.

Fragmentation has direct negative impacts on consumers: it creates uneven expectations and regulations—often based on arbitrary geographic or service offering distinctions—that cause consumer confusion. We have seen these negative impacts play out in other contexts such as privacy law. In the absence of a federal privacy regime, state governments have increasingly

[27] *See Cybersecurity and AI Workshop Concept Paper*, National Institute of Standards and Technology (Feb. 14, 2025), https://tinyurl.com/yc7erabk.

regulated on this topic,[28] leading to consumer confusion and adverse economic consequences by straining resources and unnecessarily burdening the private sector. This patchwork approach is already happening with AI policy. States are already adopting comprehensive AI laws and there is a groundswell of coming legislation.[29] In California alone, for example, Governor Gavin Newsom signed 17 bills in 30 days covering the deployment and regulation of GenAI technology.[30]

To avoid this issue and its numerous negative impacts, OSTP should work with Congress to develop federal solutions that preserve a federal framework. That framework should expressly preempt state laws to minimize the risk of overlapping or conflicting obligations. Additionally, any federal AI policies should avoid including AI-specific privacy and data security requirements. As mentioned above, there is a demonstrated need for comprehensive federal privacy legislation rather than state-by-state approaches. Congress should enact a comprehensive risk-based national privacy and data security framework based upon the type of information collected, used, or shared, not the type of entity engaged in such collection, use or sharing. Imposing AI-specific privacy requirements would only complicate the already intricate web of existing privacy obligations and impede American innovation, to the detriment of consumers and our economy.

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[28] *See, e.g.*, California Consumer Privacy Act, as amended, Cal. Civ. Code § 1798.100 *et seq*.

[29] *See, e.g.*, Colorado AI Act, as amended, C.R.S. § 6-1-1701 *et seq*.

[30] *See* Press Release, *Governor Newson Announces New Initiative to Advance Safe and Responsible AI, Protect Californians*, Governor Gavin Newsom (Sept. 29, 2024), https://tinyurl.com/y6r7tsr7. Among other California bills concerning GenAI technology: AB 1008 clarifies that personal information under the California Consumer Privacy Act can exist in various formats, including information stored by AI systems; AB 2013 requires AI developers to post information on the data used to train the AI system or service on their websites; and SB 942 requires developers of covered GenAI systems to include provenance disclosures in the original content their systems produce and make tools available to identify GenAI content produced by their systems. *Id.*

E. To the Extent Additional Action is Needed, OSTP Should Embrace a Voluntary, Flexible, and Risk-Based Approach

As noted above, many existing frameworks can already protect against AI risks. As OSTP develops a national action plan, it should take account of existing approaches to avoid unnecessary regulation. As AI evolves, and if action may be needed, OSTP should embrace a voluntary, flexible, and risk-based approach drawn from stakeholder input. OSTP should ensure any policies or standards that are adopted are flexible and not impose a one-size-fits-all approach. Flexibility is a well-established principle that has been at the heart of successful approaches for promoting emerging technologies for decades. Indeed, several existing frameworks already help organizations protect against potential AI risks and incorporate the principles of flexibility.[31] These frameworks are building in sufficient flexibility to allow technology to progress rapidly without saddling innovators with unnecessary red tape. Flexibility also makes policies on AI development and use more future-proof and adaptable to ever-changing technological developments (and emerging threats).

Flexibility is preferable to rigid, top-down government controls that will only slow innovation, and risks locking organizations into processes that quickly become ineffective and outdated. Additionally, rigid requirements may encourage some to adopt a "compliance mindset," taking steps simply to "check the box" rather than devoting resources to meaningful efforts. Organizations might be forced to waste time on paperwork, rather than innovating. AI innovation is underway and may encompass a vast universe of technologies and use cases, making flexibility crucial for ensuring continued progress.

[31] *See Risk Management*, National Institute of Standards and Technology, https://tinyurl.com/mtu2cjnb (last visited Mar. 14, 2025).

As mentioned, existing frameworks protect against AI risks. OSTP should leverage these existing, useful resources, and continue to partner with industry on addressing these issues. For example, NIST's AI RMF and Cybersecurity Framework ("CSF") are widely accepted federal frameworks for managing cybersecurity risks targeting AI systems. The Department of Energy's AI Intelligence and Technology Office has also developed an AI Risk Management Playbook. And the FCC has clarified that the TCPA applies to calls using AI-generated voices.[32]

A risk-based approach is highly suitable for emerging technologies that can be used in myriad ways, such as AI. AI technologies present varying levels of risk, and companies should be able to take this into account when tailoring their risk management strategies. An approach that imposes requirements only when necessary in high-risk situations—rather than trying to address AI as a monolithic technology or treating all applications of AI the same—will allow organizations to leverage the benefits of AI without undue barriers, while effectively addressing identified risks.

A flexible, risk-based framework properly reflects that not all actions to manage risks will apply to all AI actors, and responsibilities may shift as roles in the AI value chain evolve. Responsibility for managing risk across the AI value chain should be shared. But shared responsibility does not mean that each stakeholder will play an identical role in ensuring the safe and responsible use of AI. The Action Plan should properly delineate the responsibilities of stakeholders in the AI value chain in a way that aligns with their roles, as stakeholders may be best positioned to manage different types of risk.

For example, to the extent that deployers' and developers' roles are defined, any policies should specify that a deployer should only be considered a developer if it is changing the model

[32] *See TCPA Declaratory Ruling*.

in a transformative and extensive way. Merely tailoring or fine-tuning the model to meet the deployer's business needs or conducting testing should not transform a deployer into a developer.

OSTP should also promote industry-led standards activities, which tend to be open and transparent and can lead to greater security and resilience for AI systems. Promoting broad engagement from stakeholders, at every stage of the standards development process, will help ensure that varying viewpoints based on real-world experience feed into the standards process. Standards development driven by the private sector will help ensure robust participation and foster U.S. technological leadership for the next decade and beyond. And involving industry will also make it more likely that the standards will be broadly adopted. This approach was successfully used for development of AI standards, as NIST examples illustrate, and this approach should be replicated going forward.

V. CONCLUSION.

CTIA supports OSTP's efforts to develop an AI Action Plan. As OSTP finalizes the Action Plan, it should establish policy actions that advance innovation and American leadership in both next generation 5G and AI. To do so, OSTP should identify additional spectrum resources for 5G technologies that provide the capabilities and infrastructure needed to lead in AI and streamline existing frameworks and minimize regulatory constraints that would operate counter to these goals. These steps can drive a uniform, national Action Plan that ensures continued American leadership by promoting 5G and AI technologies. CTIA looks forward to engaging with OSTP as it further develops the Action Plan.