Comment to the Record on the Development of an AI Action Plan

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Introduction

We appreciate the opportunity to comment on the development of the AI Action Plan. As artificial intelligence (AI) continues to transform industries and national security dynamics, it is critical the United States adopts policies that foster innovation, protect economic competitiveness, and enhance national security.

The following outlines three priority actions for inclusion in the AI Action Plan: (1) strengthening AI infrastructure to ensure long-term U.S. leadership, (2) leveraging strategic federal procurement to support an interoperable AI ecosystem, and (3) mitigating foreign threats, particularly from China, through a proactive and holistic strategy to AI infrastructure.

1. Strengthening AI Infrastructure to Ensure Long-Term U.S. Leadership

While the fundamentals still favor the U.S. and its allies, leadership in AI is not guaranteed. China's recent breakthroughs in AI, despite limited access to cutting-edge chips, highlight their determination and willingness to adapt. Their advances are not a sign of American weakness but a reminder that we must be proactive in extending our lead.

The U.S. must invest in AI infrastructure to maintain technological leadership. While much policy attention focuses on AI models, the foundation of AI innovation is hardware and data center infrastructure. Today, over 90% of advanced AI chips used in U.S. data centers come from a single company, creating potential bottlenecks and vulnerabilities.[1] Furthermore, adversarial nations such as China are actively developing alternative AI frameworks, as seen with Huawei's efforts to replicate America's AI advantage through state-backed full-stack development.

It is imperative that AI infrastructure in the U.S. must be secure, scalable, and interoperable. Key components include:

- Expanding domestic AI chip production and data center capacity to reduce dependency on foreign supply chains and mitigate risks of AI chip shortages.

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[1] https://www.marketplace.org/2024/05/22/nvidias-at-the-top-of-the-ai-heap-but-others-are-trying-to-chip-away/

- Ensuring AI system interoperability by supporting existing open software and hardware standards and hardware-agnostic programming environments, as well as developing new open hardware and software standards as new technologies develop, all of which will allow multiple vendors to compete and innovate.
- Reducing single points of failure in critical AI systems by promoting multi-vendor solutions and contingency planning for supply chain disruptions.
- Increasing computing access for startups and researchers to ensure that AI innovation is not concentrated in a few dominant players.

The U.S. learned valuable lessons from past technological battles, including the reliance on Chinese telecom infrastructure.[2] The same proactive approach should now be applied to AI, ensuring robust, scalable, and secure infrastructure that supports national interests.

2. Leveraging Federal Procurement to Support an Interoperable AI Ecosystem

The federal government wields significant influence through procurement policies. Federal IT spending exceeds $92 billion annually, and this purchasing power should be leveraged to support open, interoperable AI development.[3] A key lesson from past technology policy, such as the deployment of secure 5G networks, is that standardization and open interfaces can drive innovation while reducing vendor lock-in. Unfortunately, there have been recent efforts to bypass open standards on interoperability through exclusive arrangements that reduce choice and risk harming future innovation.[4]

To promote a competitive AI ecosystem, the AI Action Plan should consider:

- Encourage government-sponsored AI infrastructure purchases to support existing and future open standards for hardware and software integration, ensuring that government investments foster a flourishing market for vendors.
- Establish AI testbeds within federal agencies where startups and smaller players can pilot AI applications in real-world government scenarios, leveling the playing field for emerging companies.

These procurement policies will not only accelerate innovation, but also ensure that AI development aligns with national security and economic resilience goals.

3. Mitigating Foreign Threats Through Proactive Policy Measures

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[2] https://digitalfirstproject.substack.com/p/lessons-from-telecom-inform-future

[3] https://www.gao.gov/products/gao-23-106821

[4] https://www.crn.com/news/networking/2025/cisco-nvidia-to-create-cross-portfolio-networking-solutions-for-ai-data-centers

AI is a cornerstone of future economic and military power. However, adversarial nations, particularly China, are actively seeking to undermine U.S. leadership through state-backed AI development. A recent example is the Chinese AI startup DeepSeek, which reportedly developed models competitive with OpenAI and Anthropic despite lacking access to cutting-edge American chips.[5] This underscores the need for a proactive AI strategy that safeguards national interests.

To address these challenges, the U.S. should:

- Support domestic alternatives to foreign AI hardware and software to reduce potential dependencies that could be exploited in future geopolitical conflicts.
- Expand AI security measures to prevent adversarial cyberattacks and AI model poisoning attempts that could compromise U.S. infrastructure.
- Promote competition and multivendor solutions to reduce the potential for harmful monocultures.

By recognizing AI as a strategic asset and enacting policies that preempt foreign threats, the U.S. can ensure it remains the global leader in AI development.

Conclusion

This AI Action Plan could not come at a better time and presents a pivotal opportunity to reinforce America's leadership in artificial intelligence. By focusing on AI infrastructure, leveraging federal procurement for open innovation, and proactively addressing foreign threats, the U.S. can secure its long-term competitiveness in this critical domain.

We encourage OSTP and NITRD to consider these recommendations and prioritize policies that will maintain U.S. AI dominance while fostering an environment of innovation and national security.

Thank you again for the opportunity for providing the opportunity for Digital First Project to participate in this process. We stand ready and able to share our experience and expertise in this process.

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[5] https://www.washingtonexaminer.com/restoring-america/3314758/america-must-lead-in-ai-innovation-to-counter-china/