

March 14, 2025

By Email to

Faisal D'Souza
Networking and Information
Technology Research and Development
National Coordination Office
National Science Foundation
2415 Eisenhower Avenue
Alexandria, VA 22314, USA

Re: Request for Information on the Development of an Artificial Intelligence (AI) Action Plan

Dear Mr. D'Souza:

Planet Labs PBC (Planet) submits the following comments in response to the Administration's Request for Information on the Development of an Artificial Intelligence (AI) Action Plan.¹ Planet manufactures and operates the largest fleet of commercial Earth imaging satellites in the world. To help our customers obtain value and insights from the terabytes of data that our satellites produce daily, Planet and its customers and partners leverage machine learning and AI tools to analyze our imagery. Satellite imagery promises better information about what's happening on Earth, enabling individuals, companies, and governments to make better, more informed decisions. AI tools, applied to our imagery on the ground and deployed on our satellites in space, will yield faster, more accurate insights and enable more people to reap the benefits of viewing Earth from space. These benefits depend on the adoption of pro-innovation AI policies that appropriately address different levels of AI risk and allow low-risk AI (for example as applied to the analysis of satellite imagery data) to flourish with minimal government intervention. Planet offers the following recommendations, discussed in further detail below:

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¹ Nat'l Science Foundation, Request for Information on the Development of an Artificial Intelligence (AI) Action Plan, 90 Fed. Reg. 9088 (Feb. 6, 2025).



- Adopt a faster, more flexible procurement process for U.S. Government AI use cases in low risk areas such as analysis of satellite imagery.
- Encourage development and adoption of industry standards and best practices rather than adopt prescriptive regulations.
- Where laws and regulations are needed, define the scope of AI narrowly to exclude machine learning.
- Focus any regulation on the high-risk use cases and enable robust innovation to flourish in the low-risk area of satellite imagery analytics.
- Maintain a light-touch approach on regulating the export of products that utilize AI.
- Focus on transparency in where companies are using AI and how the models are trained, prompted, or applied.

I. Who is Planet?

Planet is a leading provider of global, daily satellite imagery and geospatial solutions. Planet is driven by a mission to image the world every day, and make change visible, accessible, and actionable. Founded in 2010 by three NASA scientists, Planet designs, builds, and operates the largest Earth observation fleet of imaging satellites. Planet provides mission-critical data, advanced insights, and software solutions to over 1,000 customers, comprising the world's leading agriculture, forestry, intelligence, education and finance companies and government agencies, enabling users to simply and effectively derive unique value from satellite imagery. Planet is a public benefit corporation listed on the New York Stock Exchange as PL and headquartered in San Francisco, California. To learn more visit www.planet.com.

II. How does Planet use AI with its satellite imagery?

Planet's archive holds 10+ billion sq km of satellite imagery, with proprietary datasets back to 2009 and public datasets back to 1972. And we're adding more every day. With AI, our customers can make sense of the complexity of such vast amounts of data and extract meaningful insights, helping analysts identify unknown unknowns in imagery – the critical pieces of information that analysts may not even know to look for. For example, Planet and its customers and partners are leveraging AI in the following ways:



 We're already delivering Al-driven solutions today - from finding newly-built roads and identifying collapsed or constructed buildings to monitoring deforestation throughout the Amazon and predicting crop yield potential and agronomy risks.



Building Detection (magenta) on Planet Basemaps, New Cairo, Egypt

• In the maritime domain awareness space, we have customers now using our data to help monitor large ocean areas for illegal fishing vessels, military activity, or illicit ship-to-ship transfers.





Ship Detection, Singapore Strait, October 8, 2023

- Our next-generation Pelican satellite is equipped with onboard edge compute to help rapidly transform our data into insights for customers. With Al processing happening in space right on our satellite, we unlock the potential to automatically identify objects of interest in our data from space and deliver insights to our customers faster than ever before.²
- Planet's large, unique archive of over 50 petabytes of Earth observation data offers an untapped resource to train future models, including predictive and world models. This has transformative potential to derive meaningful insights and enable better decision-making.
- Planet is leveraging Vision Language Models (VLMs) such as Anthropic's Claude to enable visual question answering about Planet imagery, enhance site monitoring, and summarize key results.³

https://www.businesswire.com/news/home/20240610385569/en/Planet-Labs-PBC-Announces-Real-Time-Insights-Technology-Using-NVIDIA-Jetson-Platform.

² Press Release, *Planet Labs PBC Announces Real-Time Insights Technology Using NVIDIA Jetson Platform* (June 10, 2024),

³ Press Release, *Planet and Anthropic Partner to Use Claude's Advanced Al Capabilities to Turn Geospatial Satellite Imagery into Actionable Insights* (Mar. 6, 2025),

https://www.businesswire.com/news/home/20250306606139/en/Planet-and-Anthrop



- Planet has programmatic data access and analysis tools via application-programming interfaces (APIs) that can enable and support agentic AI workflows for insights extraction. The Planet platform can enable users to perform automated tool use and orchestrate complex analysis workflows.
- III. U.S. AI policy should enable the growth and development of AI technology that helps derive value from satellite imagery data while addressing high-risk areas and preventing export of our most sensitive U.S. technology to high risk jurisdictions.

To maintain U.S. Al leadership, the U.S. Government should adopt Al policies that support innovation and growth in this rapidly developing space while addressing high-risk areas and preventing export of cutting edge Al chips to high risk jurisdictions. Critically, efforts to address Al risks should be tailored to the specific risks at issue and a light touch applied to low-risk Al applications. Planet outlines below its suggestions for inclusion in the Al Action Plan.

Adopt a faster, more flexible procurement process for U.S. Government AI use cases in low risk areas such as analysis of satellite imagery.

- The powerful combination of satellite data and AI is being adopted by governments and commercial customers worldwide. This combination promises significant advantages in the defense and national security space, among other sectors, and the U.S. Government must do more to keep pace.
- Openness to new commercial AI tools can help both defense and intelligence and civilian agencies make better use of the troves of satellite imagery data available to them and extract the critical insights that lead to better decisionmaking.
- U.S. Government procurement processes and legacy systems do not lend themselves today to rapid adoption of new technologies like AI.
- Procurement processes take too long and budget cycles are not sufficiently flexible to adapt to fast-paced changes in AI technology.

<u>ic-Partner-to-Use-Claudes-Advanced-Al-Capabilities-to-Turn-Geospatial-Satellite-Imagery-into-Actionable-Insights.</u>



- The U.S. Government should consider the following procurement changes to increase Al adoption:
 - More agile, faster procurement processes that build in pools of funding that can be used flexibly for new technology;
 - Focus procurements on buying outcomes (for example, Al-generated insights) rather than inputs (such as satellite imagery data); and
 - For rapidly developing technologies such as AI, focus procurement efforts on the commercial capabilities on offer in the marketplace rather than drafting lengthy government requirements that may not align with commercial offerings and will slow the process. U.S.
 Government procurements must keep pace with industry innovation or the United States risks falling behind its peers.

Encourage development and adoption of industry standards and best practices rather than adopt prescriptive regulations.

 As in other fast-evolving areas such as cybersecurity, specific and prescriptive regulations for AI may not be able to keep pace with technological evolution and may become quickly outdated. Industry standards and best practices in AI will be better equipped to keep pace with technology without overly restricting innovation and will be more responsive to the needs and risks of AI deployment in particular sectors.

Where laws and regulations are needed, define the scope of AI narrowly to exclude machine learning.

- Machine learning tools are not new and should not be the focus of new Al-focused regulatory initiatives that have been spun up to address the unique risks of new, generative Al solutions.
- Policymakers should define AI narrowly for the purpose of crafting any new laws or regulations so that restrictions focus on new, high-risk generative AI activities and do not unintentionally sweep in machine learning capabilities that have long been on the market.



Focus any regulation on the high-risk use cases and enable robust innovation to flourish in the low-risk area of satellite imagery analytics.

- Not all Al tools and use cases present the same level of risk and the Administration's policy approach should recognize this reality.
- The use of AI for satellite imagery processing and analysis typically should be considered low risk. Unlike drone imagery, for example, commercial satellite imagery such as Planet's is of insufficient resolution to identify individuals or their personal identifying information (such as license plates, for example).
- In these circumstances, use of AI to analyze commercial satellite imagery is low risk and heavy-handed government regulations could stymie innovation in this nascent area.
- To the extent that some applications of AI to satellite imagery may raise additional risks (for example, to inform automated decision making in the national security or critical infrastructure space), any regulation should be narrowly tailored to address the particular anticipated harms and should not apply broadly to whole categories of AI software.

Maintain a light-touch approach on regulating the export of products that utilize AI.

- Export controls are an important tool to safeguard U.S. technology and prevent it from falling into the wrong hands.
- But implementation of these controls imposes great compliance costs on industry and, in the AI space, risks holding U.S. AI development and innovation back when international competitors are not subject to the same restrictions.
- Export controls should continue to focus on the newest, most cutting edge hardware that powers AI and should avoid regulating the export of software, models, and other products that utilize AI.
- If the Administration nevertheless moves forward with export restrictions on software, models, or other products that utilize AI, those restrictions should be clearly and narrowly defined to focus on new, high-risk generative AI activities and should not sweep in standard machine learning capabilities or low-risk geospatial data analytics tools.



Focus on transparency in where companies are using AI and how the models are trained, prompted, or applied.

- Although not everything an AI system does will be explainable, Planet supports setting expectations for AI developers to provide transparency regarding where and how they are using AI, the origin and quality of datasets used for training, and how privacy and security are handled. This will go a long way toward fostering trust in AI systems.
- Regulations or standards in this area should not, however, require disclosure of a level of detail that would open the AI system to risk of intellectual property theft or security threats.

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Planet appreciates the Administration's efforts toward developing an Al Action Plan that promotes American leadership in Al. We look forward to continuing to partner with other companies and governments in advocating and implementing responsible and pro-innovation Al policies.⁴

Respectfully Submitted,

/s/ Danielle J. Piñeres

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⁴ This document is approved for public dissemination. The document contains no business-proprietary or confidential information. Document contents may be reused by the government in developing the Al Action Plan and associated documents without attribution.