



March 14, 2025

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

Re: Zillow Group's comments on the *Request for Information on the Development of an Artificial Intelligence (AI) Action Plan (2025-02305 (90 FR 9088))*

Dear Office of Science and Technology Policy and the National Science Foundation:

On behalf of Zillow Group, Inc., thank you for the opportunity to comment on the *Request for Information on the Development of an Artificial Intelligence (AI) Action Plan (2025-02305 (90 FR 9088))*. Zillow appreciates the Office of Science and Technology Policy and the National Science Foundation's prioritization of policy actions needed to sustain and enhance America's AI dominance and advance private sector AI innovation. Zillow welcomes the chance to offer our policy recommendations and describe our work in responsible AI that benefits American consumers, advances economic competitiveness, and supports America's continued leadership in AI.

Introduction

Zillow was founded in 2006 to bring transparency to the real estate market, and we've been working to transform the real estate experience ever since. Empowering and advocating for consumers is core to who we are and why we exist. We foster transparency by publishing industry-leading economic research, use those insights to build AI-driven solutions to help consumers navigate an increasingly challenging housing market, and advocate for effective housing policies that make it easier, more affordable, and secure for renters, buyers, and sellers. Additionally, Zillow provides products and services to help real estate professionals streamline their businesses and deliver elevated customer experiences. Zillow [research](#) shows that housing significantly contributes to the US economy, and we are committed to responsibly deploying AI to make the housing market operate more efficiently and transparently.

AI at Zillow

Artificial intelligence has been central to Zillow since our founding with the launch of the Zestimate, which was based on an AI model, marking the first time consumers could find an instant, free estimate of their home's value using details about the home, property tax assessment information, and sales histories. As our use of technology evolves, our consumer-focused approach to innovation remains at the core of our mission to make home a reality for more and more people.



Today, Zillow is more than just a place to shop—it's a place to transact: you're applying for a rental, paying your rent, virtually touring homes, connecting with an agent, and securing financing from our affiliated mortgage company Zillow Home Loans or through our lender network. Given that Zillow has over 200 million unique users every month, it's vital that they are equipped with safe, trustworthy AI-powered tools that are developed and deployed responsibly to make searching for, renting, buying, or financing a home more transparent and affordable - and less daunting.

As a tech company, we are excited about the opportunities to continue to leverage AI internally and externally. Today, AI is an integral part of our products and solutions—along with human supervision through an employee, agent, or loan officer—and is critical to getting a consumer all the way through a transaction. Our AI-powered work includes Human-In-The-Loop (HITL) as an essential part of developing and deploying AI models, providing high-quality training labels, and helping to deliver high-quality model output.

AI for All Consumers

We continually leverage AI to drive innovation and enhance the shopping experience, making it more seamless, user-friendly, and affordable for home shoppers. One great example of AI at work is our 3D home tours and interactive floor plans. These shopping experiences open up homes to people who cannot be there in person to tour them. They also help save consumers time: a Zillow survey reports more than half of prospective buyers regret wasting time visiting properties they would have skipped if they had access to the floor plan beforehand.

We have also deployed AI to help consumers search for homes on Zillow using natural language, as if they were talking to a friend, neighbor, or family member. With natural language search, a shopper doesn't have to sift through and select every filter to search, making it easier for shoppers to filter home options. It's a more intuitive and personalized search experience that saves time and provides more relevant results.

Personalization is another way AI adds ease to the way consumers use our site. Zillow uses AI to recommend homes to users based on their past search activity and other preferences. These models enhance housing choice by leveraging AI to broaden search options and show all consumers a wider range of homes from a wide range of neighborhoods. This ensures varied and relevant results, helping consumers discover options they may have missed or that were previously unknown.

As we continue to scale AI initiatives that simplify the buying and selling process through automation, personalization, and self-service, our tools and products will streamline home shopping in tandem with our human partners and operators.

AI and Consumer Safety

We place great emphasis on improving transparency in the housing industry, especially when it comes to the use of AI. Many off-the-shelf AI tools, including large language model (LLM)



technology, may disregard existing federal laws and, when deployed, can disadvantage Americans.

As an example of our commitment to consumer safety, Zillow developed an open-source [Fair Housing Classifier for LLMs](#) to promote responsible behavior in real estate conversations powered by LLM technology. With this open sourcing, anyone whose work touches real estate and technology can take what we've built and use it to test real estate conversations within their own LLMs. We have encouraged the tech, housing, and other communities to contribute and collaborate, which could lead to further innovation and expanded applications. This will help empower these sectors to improve real estate and innovate faster.

Creating transparency and increasing access to the housing market is a top priority for Zillow, and we will continue to responsibly utilize AI to help ensure every buyer, seller, and renter has as much information available to them as possible.

AI for Real Estate Professionals

One of the most significant opportunities we have with AI is to make it easier for those in the real estate industry to do their job and provide greater value to customers. Great real estate professionals are critical to helping customers get home; we don't see that changing. We envision AI evolving from "AI that helps you" through "AI that assists you" to "AI that works for you" - and real estate professionals are one of the biggest potential beneficiaries of this evolution.

Our efforts are largely focused on using AI to help real estate agents become even more productive and successful, with tools to help scale their operations, automate mundane tasks, and access data that matters so they can focus on delivering what only they can: the human component. For example, our recently introduced AI Call Summarization tool generates summaries and next steps of agents' conversations with customers, allowing agents to spend less time on administrative work and more time building relationships with buyers.

Similarly, AI can help loan officers automate follow-up notes and tasks, easily transfer data between tools, and calculate finances—saving them time to process more loans and better serve customers. By streamlining administrative work, AI can enable loan officers to focus on meeting borrowers' needs while also minimizing compliance risk by prioritizing data-driven insights over protected characteristics.

Policy Recommendations for the AI Action Plan

As a leader in real estate technology, Zillow is committed to working with the administration to develop balanced AI policies that protect public interests while ensuring the US maintains its global leadership and fosters AI innovation. Zillow uses existing legal frameworks, including the Fair Housing Act and Equal Credit Opportunity Act, to address discrimination concerns and applies these standards to both human behavior and AI tools. Our fair housing and lending compliance programs are built around those existing laws—and are informed by our almost 20



years of serving consumers and creating innovative AI-driven products on their behalf.

Creating Uniform Standards

Zillow believes that uniform and comprehensive standards for AI are essential for maintaining US leadership in AI, fostering innovation, and protecting consumers. One example is the National Institute of Standards and Technology's (NIST) AI Risk Management Framework (RMF), which provides a strong foundation for developing and deploying AI technologies responsibly, safely, and effectively. By voluntarily adhering to these standards, companies like Zillow can continue to innovate while maintaining high ethical standards and consumer trust. We encourage the Administration to incorporate standards like the NIST RMF as a model for any future policy development, regulations, and standards.

Fostering Innovation

We encourage the Administration to examine risks from AI across sectors and, to the extent that regulatory gaps are identified in housing and lending, we welcome the chance to explore how its proposals can protect consumers without stifling innovation or decreasing consumer benefits. Overall, we support proportionate, flexible, and risk-based regulatory frameworks that avoid limiting the potential benefits of AI technologies and allow companies to innovate on behalf of their consumers.

We believe that AI will continue to bring positive outcomes to the housing market, from expediting application approval processes to helping consumers better understand their finances to expanding access to credit. This technology holds great potential to cut costs and target services, to reduce wait times, and to improve housing affordability and supply. To unlock AI's full potential, we need a consistent regulatory framework across the US that fosters consumer understanding and trust while providing clear compliance guidelines for businesses like Zillow, allowing us to deliver the benefits of AI to consumers nationwide. A unified, national approach is essential for driving innovation and creating a more accessible and affordable housing market for all Americans.

Establishing Privacy Laws

Zillow prioritizes safeguarding consumer data by implementing robust data privacy measures that protect personal information while enabling seamless experiences across our platform. We support efforts to provide consumers with transparency regarding how their personal data is collected, managed, and used. This includes ensuring compliance with relevant privacy laws and regulations to protect the privacy and personal data of individuals whose information Zillow processes.

Zillow's approach to data privacy includes:

1. *Transparency*: Zillow is committed to empowering consumers by providing clear information about data collection and usage practices. This transparency helps consumers understand and decide how their data is used to shape their experience on the platform.



2. *Compliance*: Zillow ensures compliance with state and federal privacy regulations, including those that require privacy impact assessments (PIAs) for new or modified products, services, or vendor engagements that involve personal information.
3. *Consumer Rights*: Zillow respects consumer rights and aligns our approach with state privacy law requirements, such as the California Consumer Privacy Act (CCPA) and the California Privacy Rights Act (CPRA). This includes honoring requests for data deletion and providing mechanisms for consumers to control their data.
4. *Security*: Zillow maintains strict standards for data security to prevent unauthorized access, use, or disclosure of personal information. This includes regular monitoring, testing, and incident response management to address any potential data exposure incidents.

Zillow supports the establishment of a national consumer privacy law with strong federal preemption to protect consumers and provide businesses with clear guidelines. The increased use of AI technology in processing and using consumer personal data presents new challenges in providing transparency to consumers regarding how their data will be used and disclosed to third parties, as well as the level of control available to consumers over such usage. A uniform and common-sense framework setting forth guidelines for applying privacy regulations in the context of AI is needed to ensure the protection of consumers' privacy while also providing businesses with clear rules that enable rapid innovation and growth.

Modernizing Housing Finance

Responsibly integrating AI into mortgage compliance and risk management offers significant opportunities for cost reduction, process streamlining, and enhanced transparency. Zillow is actively modernizing these systems and is committed to both innovation and regulatory compliance. We believe in the transformative power of technology to improve the mortgage experience and better serve consumers.

To fully realize these benefits, regulatory reform is essential. The Real Estate Settlement Procedures Act (RESPA), now over 50 years old, is long overdue for holistic reexamination to reflect the modern digital marketplace and the robust consumer protections enacted since its inception, e.g., Loan Originator Compensation, Ability to Repay/Qualified Mortgage, TILA-RESPA Integrated Disclosure, etc. This includes removing barriers to affiliated entities, allowing them to offer consumers better pricing, services, and discounts.

We encourage the administration to pursue policies that will modernize regulations, especially the use of AI to optimize disclosures, ensuring consumers receive clear, concise, and relevant information at critical decision points. We also encourage the Administration to initiate efforts to modernize and clarify language used for purposes of engaging with consumers, in-line with communication, marketing, and engagement tools available to consumers in the marketplace today. By modernizing our regulations, we can unlock the full potential of AI to create a more efficient and affordable mortgage market.



Conclusion

Thank you for the opportunity to share Zillow's commitment to responsible AI in real estate and the federal policy recommendations we believe will benefit American consumers, advance economic competitiveness, and support America's continued leadership in AI. Moving forward, by favoring flexible, risk-based approaches and developing uniform standards, the US can unlock significant improvements in housing finance, affordability, and supply.

We look forward to partnering with the Administration to advance consistent AI policies that allow Zillow to continue building products to make today's challenging housing market easier, more affordable, and secure for all American renters, buyers, and sellers.

Sincerely,

David Pope
Federal Government Relations
Zillow Group, Inc.

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