

May 28, 2025

Faisal D'Souza
Networking and Information Technology Research and Development (NITRD) National
Coordination Office (NCO)
2415 Eisenhower Avenue
Alexandria, VA 22314

Dear Mr. D'Souza,

These comments are submitted on behalf of Business Roundtable, an association of more than 200 chief executive officers (CEOs) of America's leading companies, representing nearly every sector of the U.S. economy. Business Roundtable CEOs lead U.S.-based companies that support one in four American jobs and almost a quarter of U.S. GDP. Business Roundtable members, whose companies are among the world's largest developers and deployers of AI, are committed to ensuring the United States remains a leader in AI technology. We appreciate the opportunity to respond to the National Science Foundation (NSF) and Networking and Information Technology Research and Development (NITRD) National Coordination Office's (NCO) Request for Information (RFI) on the Development of a 2025 National Artificial Intelligence (AI) Research and Development (R&D) Strategic Plan.

Federally-funded research is a vital part of the technology innovation cycle, enabling continued innovation and commercialization by the private sector. Business Roundtable appreciates the opportunity to provide comments, and our members are eager to work to advance U.S. leadership on AI and strengthen global competitiveness. When developing the 2025 National AI R&D Strategic Plan, Business Roundtable recommends the Administration prioritize:

- Strengthening Partnerships with Industry,
- Enhancing Innovation Infrastructure, and
- Driving the Development of Harmonized, Risk-Based and Innovation-Enabling Standards.

Strengthening Partnerships with Industry

The Administration should continue partnering with industry, which has driven U.S. leadership on AI innovation. Strategic public-private partnerships benefit from the unique value and knowledge that government, businesses, and civil society partners provide, ultimately providing a stronger AI ecosystem to advance the joint interests of U.S. economic and national security. Business Roundtable encourages the Administration to support and maintain public-private initiatives, including existing partnerships such as the National Artificial Intelligence Research

Resource (NAIRR), which provides AI researchers access to computational data and other necessary resources, and the U.S. AI Safety Institute, which develops testing, evaluations, and guidelines that will help accelerate trustworthy AI innovation. These partnerships can help ensure that the American AI industry remains the global standard-bearer for cutting-edge AI development. Strong public-private partnerships will advance critical research at both lower technology readiness levels (TRLs) and higher TRLs, both of which are necessary to maintain U.S. leadership in AI.

Business Roundtable encourages the Administration to work with the private sector on R&D related to securing the AI lifecycle (supply chain, model provenance, model validation, automated red-teaming, pre- and post-deployment). Businesses on the front lines of AI development and deployment are best positioned to spot quickly evolving challenges for U.S. companies, including those that manage critical infrastructure. For example, adoption of quantum computing poses novel cybersecurity risks to U.S. businesses and critical infrastructure over the next several years. Research into AI-enabled cybersecurity technologies will enhance readiness to defend against such attacks.

Enhancing Innovation Infrastructure

Expanded access to AI infrastructure and tools will broaden innovation capacity within the American economy and create economic benefits. Business Roundtable encourages the Administration to expand participation in AI R&D by enhancing shared infrastructure, including access to compute power, through expanding the NAIRR's efforts to accelerate AI innovation and produce meaningful returns on investment. In addition, the Administration can strengthen the physical infrastructure underlying AI leadership through streamlined permitting processes for infrastructure supporting AI development and deployment.

Driving the Development of Harmonized, Risk-Based, and Innovation-Enabling Standards

As AI innovation continues to transform the world, standards will ensure that organizations are prepared to evaluate and adopt the technology and will strengthen public trust. The first Trump Administration prioritized the development of AI standards, including in the 2019 Executive Order on Maintaining American Leadership in Artificial Intelligence (E.O. 13859). We encourage a continuation of this work to create clear and effective standards as AI development and deployment evolves, which are essential to promote innovation. Partnership with industry will be vital to ensure that standards are reflective of all stakeholders and based on a practical understanding of implementation, enabling American AI innovation. Collaboration on international AI standards is important to support global market access for American businesses. Business Roundtable recommends that AI development and deployment standards be voluntary, harmonized, flexible and industry-driven.

Conclusion

Business Roundtable appreciates your consideration of our comments and looks forward to working with the Administration to continue U.S. leadership and innovation in AI. For any questions, please contact Amy Shuart, Vice President of Technology & Innovation, Business Roundtable, at ashuart@brt.org or (202) 496-3290.

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