Business Roundtable

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

Re: Business Roundtable Response to Request for Information (RFI) on the Development of an AI Action Plan

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. 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 an Artificial Intelligence Action Plan ("AI Action Plan").

Introduction

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. AI is a driver of innovation, creating new industries, improving efficiency and boosting productivity. Maintaining leadership in AI ensures that the U.S. remains competitive in the global economy while also benefiting from AI's role in scientific progress, technological breakthroughs and national security. Continued leadership in AI is essential for protecting U.S. critical infrastructure and American entities from adversaries.

Business Roundtable applauds NSF and NITRD for soliciting comments on the development of the AI Action Plan to advance our shared goals of U.S. competitiveness and leadership, and we urge continued cooperation with the private sector as the process continues. Below, we discuss policy recommendations for the building blocks of a strong AI ecosystem in the United States as well as international engagement to promote U.S. leadership in AI technology.

Enablers of a Strong AI Ecosystem in the United States

Business Roundtable encourages the Administration to review policies to optimize key drivers of AI development, deployment and broad adoption in the United States which enable the private sector investment and growth that is critical to U.S. competitiveness:

- Access to technical resources;
- Voluntary, harmonized, flexible and industry-driven standards for secure AI development and deployment;
- Regulatory frameworks that provide certainty to business and foster U.S. innovation;
- Streamlined permitting processes for data center construction and associated infrastructure;
- AI research and development (R&D); and
- Workforce development.

Access to Technical Resources

Business Roundtable recommends support for strategic public-private partnerships to expand access to technical resources, including efforts to make high-impact government datasets more widely available. Advanced AI research requires vast amounts of computing power and data. Expanding access to technical resources will lower barriers to entry and stimulate innovation across the U.S. economy. The U.S. government has historically partnered with industry to provide technical resources to help mitigate threats and spur innovation — for example, by providing free anti-malware and cybersecurity services. Applying this approach to AI will allow a variety of organizations to safely accelerate the development and implementation of AI.

An important technical resource for AI innovation is government datasets, which are typically much larger in size and scope and more representative of diverse populations than non-governmental datasets. This makes them uniquely valuable for conducting research, testing, reducing bias and producing better AI models. But while open data is encouraged and often required in government, federal agencies do not prioritize publishing high-impact unclassified datasets. Increasing access to advanced computing resources and tools empowers more organizations to engage in AI research and development by reducing barriers to entry. Expanding access to these technical resources, while considering national security concerns, will accelerate responsible AI adoption and implementation and allow researchers to further our understanding of AI's beneficial uses, risks and impacts on society.

Standards

Business Roundtable encourages the Administration to work collaboratively with industry on standards for AI development and deployment that are voluntary, harmonized, flexible and build on existing widely adopted standards developed in multistakeholder venues. AI standards developed through close collaboration between government, industry, civil society, academia and international partners are among the most effective. This is because the collaborative

process ensures that standards reflect the needs of all stakeholders, leading to more practical and adaptable guidelines for different use cases. A collaborative process also enhances alignment between technological innovation and policy, maximizing the benefits of AI for the broader economy.

Among the most successful voluntary standards for any technology are those developed by the National Institute of Standards and Technology (NIST). The NIST AI Risk Management Framework (RMF) is an example of strong existing risk management guidance developed through robust public-private partnership. While the NIST AI RMF and corresponding AI Playbook will be refined over time, including updates to account for different types and uses of AI, the framework provides a foundation for developing innovation-enabling standards. Other frameworks and guidance for AI developed by the U.S. government should be consistent with the NIST AI RMF to avoid uncertainty and fragmentation across the federal approach to AI.

Regulatory Frameworks

The Administration should assess regulatory gaps to ensure that any new regulations, if necessary, are appropriately narrowly scoped to address identified gaps without harming U.S. companies' ability to innovate. Many AI applications are covered under topic-and sector-specific federal statutes. Where regulatory guardrails are deemed necessary, whether in new or existing rules covering AI systems, policymakers should provide clear guidance to businesses, foster U.S. innovation, and adopt a risk-based approach that carefully considers and recognizes the nuances of different use cases, including those that are low-risk and routine. Reporting requirements should be carefully crafted to avoid unnecessary information collection and onerous compliance burdens that slow innovation. Moreover, AI governance and regulation should evolve as the AI products, use cases and markets themselves evolve.

Any regulation intended to address AI risk should focus on evidence-based, real-world threats rather than conjectural harm. Existing regulations and industry risk management practices can be adapted to safeguard against many of the concerns regarding the societal and economic impacts of AI. Many Business Roundtable member companies have strong risk management practices in place for their supply chains to ensure the services they are procuring are secure, reliable and trustworthy. The Administration should collaborate with industry stakeholders to develop AI policies that address remaining risks without stifling innovation. When designed properly, policies that promote effective risk management practices can mitigate harm, increasing public trust in AI and advancing adoption of the technology.

Business Roundtable encourages the Administration to work with Congress on legislative solutions that preserve a national framework for AI and avoid the growing patchwork of state AI regulation that hinders AI innovation. In the absence of federal leadership, states are moving to regulate aspects of AI technology. As of March 2025, over 700 AI-related bills have already been introduced in 47 states, which is the same number of bills introduced throughout all of

2024.[1] Companies have experienced the challenges of dealing with a fragmented and increasingly complex regulatory landscape due to the patchwork of state data privacy laws, which hinders innovation and the ability to provide consumer services. Federal AI legislation with strong preemption should provide protection for consumers and certainty for businesses developing and deploying AI.

Permitting Processes

Business Roundtable supports Administration actions to facilitate investment in data centers, including streamlining permitting processes to expedite project approvals for both new data centers and related infrastructure. Investment in AI is driving rapid demand for new data centers with increased capacity. Challenges in getting permits cause construction delays, adding cost and time to data center projects. Permitting issues and other regulatory barriers also make it challenging to build the infrastructure required to support data centers such as energy supply and transmission, as well as broadband infrastructure to allow consumers to utilize AI tools and services. The Administration should work to shorten decision timelines on environmental reviews, provide preliminary feedback on application completion and accuracy, and digitize operations to streamline processes, including application submissions, necessary document uploads, feedback for revisions and status updates.[2] The Administration should also differentiate and prioritize projects by revising project permitting requirements in areas with ongoing operations and community engagement.[3]

AI R&D

Business Roundtable recommends strategic public-private partnerships to build and sustain a world-leading American R&D ecosystem, including through strategic long-term investments in science and technology and enabling conditions for private sector R&D. This can be paired with appropriate funding for federal R&D, particularly for basic research, to maximize effectiveness.

Expanding public-private partnerships—including through the Defense Advanced Research Projects Agency (DARPA), Department of Energy (DOE) National Laboratories, and Department of Defense Laboratories—could accelerate basic and applied AI research. This approach would also allow the U.S. federal government to steer AI research toward under-explored areas, such as AI for cybersecurity, targeting key areas of economic or national security interest.

[1] Multistate.AI Legislative Tracker, accessed at: https://www.multistate.ai/artificial-intelligence-ai-legislation
[2] *See* Business Roundtable, Building a Prosperous Energy Future (June 2023). https://www.businessroundtable.org/building-a-prosperous-energy-future
[3] *Ibid*

Workforce Development

America needs a workforce with the skills and training required for the in-demand jobs of today and tomorrow, including developing AI models, using AI applications and tools, and building and supporting AI infrastructure. Many Business Roundtable member companies are taking these challenges head on by hiring individuals based on skills and not just degrees, expanding apprenticeship programs and embracing second-chance employment.[4] Policymakers should complement these private-sector initiatives with reforms to the workforce development system that support employers' ever-evolving workforce needs and worker advancement in an increasingly technology-based economy.

Strategic International Engagement to Promote U.S. Competitiveness

Business Roundtable supports strong U.S. engagement with global allies and stakeholders in international standards setting and regulatory bodies as part of a strategy to lead on AI innovation. The domestic AI ecosystem can be further strengthened by U.S. efforts to shape international AI policies, ensuring they promote security and prosperity while avoiding conflicting legal obligations. U.S. leadership helps set global AI standards that align with democratic values, including transparency, fairness and privacy. Without American influence, authoritarian regimes could shape AI development and regulatory structures in ways that undermine human rights and increase surveillance.

Business Roundtable recognizes the national security implications of AI innovation and the importance of utilizing policy tools to mitigate risks to U.S. military and intelligence advantages. The Administration should collaborate closely with the business community to ensure that all new controls on emerging and foundational technologies effectively advance U.S. national and economic security objectives.

Business Roundtable recommends that the White House National Security and Economic Councils create a standing, private-sector Export Control Advisory Board (ECAB) with security clearance to ensure that private sector members understand the national security reasons for contemplated controls and policymakers are appraised of their potential commercial and economic implications.

Business Roundtable also encourages the Department of Commerce's Bureau of Industry and Security (BIS) to adopt the following practices before imposing new controls on emerging and foundational technologies:

- after identifying the national security objective for contemplated controls, analyze their potential commercial, economic and competitiveness effects including through consultation with potentially affected industries or ECAB;

[4] Business Roundtable, Corporate Initiatives, https://www.businessroundtable.org/corporate-initiatives.

- include a notice and comment period consistent with section 1758 of the Export Control Act of 2018;
- create longer safe harbors for implementation;
- simplify to reduce compliance complexity;
- create an expedited licensing authority to permit the return of consigned material owned by entities at the time of their placement on the Entity List;
- create a more transparent process for appealing decisions denying licensing requests; and
- advocate that key allies embrace comparable controls to ensure that U.S. companies are not uniquely disadvantaged.

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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