



Date: March 14, 2025
To: NITRD NCO, Office of Science and Technology Policy (OSTP)
Re: RFI on National AI Action Plan

Dear Administration Officials,

On behalf of the Public AI Network¹ community, we appreciate the opportunity to provide input on how to ensure American leadership in AI.

We believe that maintaining America's competitive edge, strengthening our economic security, and solidifying our global technology leadership can be achieved through strategic investments in Public AI infrastructure that empowers all Americans to participate in the AI revolution. Our 2024 whitepaper, *Public AI: Infrastructure for the Common Good*, outlines a definition for Public AI and a vision for a prosperous, abundant, AI future.²

Public AI infrastructure complements and bolsters private sector innovation by broadening participation and creating new markets and opportunities that benefit the entire ecosystem. Just as America's physical transportation infrastructure has enabled businesses of all sizes to thrive, Public AI infrastructure would expand participation and competition in the AI industry while ensuring the benefits of AI technology reach communities across the nation.

This administration should prioritize developing physical and digital public infrastructure in the form of **strategic computing resources, high-quality datasets for democracy, public foundation models, and standards and shared tools.**

Public AI: Infrastructure for the American Dream

Throughout our history, America has thrived by expanding opportunity to all citizens. From the land-grant college system that democratized higher education, to the interstate highway system that connected our communities—robust public infrastructure has always been the foundation of American prosperity and strength.

Today, we stand at a similar threshold with artificial intelligence. AI will reshape our economy in profound ways, yet currently, the barriers to entry are so high that only a handful of large companies in a few coastal cities can fully participate. This concentration threatens both our

¹ <https://publicai.network/>

² Public AI Network, "Public AI: Infrastructure for the Common Good," 10 August 2024, <https://publicai.network/whitepaper> DOI: 10.5281/zenodo.13914560

economic competitiveness and our ability to ensure AI reflects American values, priorities, and needs.

The global AI race is already underway, with China investing billions in state-sponsored AI research and development. While China is developing vertically-integrated AI capabilities controlled by the state, America's strength lies in our distributed innovation ecosystem. However, we risk squandering this advantage if only a handful of large companies can meaningfully participate in AI development.

We need to unlock the potential for innovation by breaking down market barriers, we need to expand access to the benefits of AI to all of our communities, and we need to build a robust AI industrial sector. Investing in truly Public AI infrastructure ensures that American entrepreneurs in communities nationwide can compete and lead, and that the American people in every community across our nation will share in the abundance and prosperity of AI advancements.

Reducing Barriers, Not Picking Winners

The role of government isn't to pick winners in the marketplace. Rather, it is to build the infrastructure that reduces barriers to entry so that every American has a fair shot at success. Just as the interstate highway system wasn't built by or for specific companies but instead enabled countless businesses to flourish, Public AI infrastructure will create the conditions for widespread innovation and AI adoption.

To that end, we recommend that this administration focus on building the physical and digital public infrastructure America needs to open up the AI economy by addressing the critical bottlenecks that give advantages to large, incumbent technology companies. Innovation will be best served by investing in Public AI infrastructure that prioritizes public access, public accountability, and permanent public goods.

We propose five priority targets for Public AI infrastructure investment:

1. **Strategic Computing Resources:** Creating publicly-accessible AI computing clusters would dramatically reduce startup costs and enable entrepreneurs across America to build competitive AI applications, similar to how the National AI Research Resource (NAIRR) pilot is already working to expand access for researchers.
2. **High-Quality Datasets for Democracy:** Establishing high-quality, publicly-available datasets would democratize AI development while also enabling AI systems to reflect

America's democratic values like freedom of expression and participatory government.

3. **Public Foundation Models:** Leverage the expertise and resources of our national labs, public universities, and federal agencies to build—instead of buy—new foundation models to expand the marketplace and address market failures.
4. **Support for State and Local Public AI Infrastructure:** Infrastructure can exist at many scales, and supporting state and local governments to develop approaches for developing Public AI in their own communities presents a potent opportunity for decentralized experimentation and innovation.
5. **Standards and Shared Tools:** Developing clear standards for AI development and establishing interoperability between systems, similar to how TCP/IP standards enabled the internet to flourish, would prevent fragmentation and enable innovation at all levels.

These investments would directly address the most significant barriers facing small businesses and entrepreneurs across America. Currently, the high costs of computing, data collection, and specialized talent keep AI development concentrated in a few corporate giants, stifling competition, innovation, and autonomy. Public infrastructure will level this playing field and unlock unprecedented potential for America to compete on the global AI stage.

Build on Existing Efforts

Thankfully, we are not starting from zero; there are several existing federal initiatives that align with this vision that this administration can build upon:

- The National AI Research Resource (NAIRR) pilot, expands access to computing resources, datasets, and tools for AI research and development.³ Passing the bipartisan CREATE AI Act⁴ that formally establishes and funds the NAIRR should be a high-priority.
- The proposed Frontiers in AI for Science, Security, and Technology (FASST) initiative at the Department of Energy,⁵ leverages our national laboratories' exceptional capabilities and resources to advance American AI competitiveness and security. Supporting and

³ <https://nairrpilot.org/>

⁴ <https://www.congress.gov/bill/118th-congress/house-bill/5077/cosponsors>

⁵ <https://www.energy.gov/fasst>

robustly funding this initiative should be a cornerstone of American AI innovation strategy.

- The National Institute of Standards and Technology (NIST) is a global leader in the development of standards and best practices for AI. Developing clear and easy to implement standards that advance accountability, interoperability, and informed consumer choice will drive competition, innovation, and widespread AI adoption.

These programs demonstrate how thoughtful public investments can expand access to AI development without distorting the marketplace. They represent excellent starting points for a more comprehensive Public AI infrastructure strategy that could dramatically expand opportunity across America.

Recommendations for Future Infrastructure Initiatives

As your administration develops its approach to AI infrastructure and evaluates new policy proposals, we respectfully offer these recommendations for how to evaluate and implement new infrastructure initiatives:

1. **Prioritize reducing barriers to entry across the entire AI stack**—from computing resources to datasets to deployment tools—with a focus on enabling small businesses and entrepreneurs in communities nationwide. This would allow 'garage innovators' across America to build tomorrow's AI applications without relocating to coastal tech hubs, startups to innovate and challenge Big Tech incumbents, and consumers to benefit from a dynamic and competitive market for AI systems and tools.
2. **Develop infrastructure with public accountability** so that AI systems built on public resources align with American values and serve the public interest. Accountable governance ensures that technology development reflects the full spectrum of American perspectives and prioritizes our pressing national challenges and priorities.
3. **Design for permanence and sustainability** to provide a reliable foundation upon which American businesses can confidently build. Long-term commitment to this infrastructure allows entrepreneurs to make strategic investments with confidence that the platform will remain accessible and consistent.
4. **Encourage distributed access and shared benefits over centralized control**, ensuring that communities across the country have the power to shape how AI is developed and

deployed in ways that reflect their needs. Success should be measured by how broadly the benefits of AI reach—fueling economic opportunity for Main Street businesses, public institutions, and local entrepreneurs in every region, not just a handful of big city technology hubs.

5. **Protect public value and taxpayer dollars.** We caution against approaches that would give away federal land or subsidize privately owned projects with taxpayer dollars without ensuring broad public benefit. The government's job isn't to pick winners in the market; it's to build the infrastructure to make sure everyone has a shot at winning.

The Public AI Network community of technologists, policy experts, economists, and civil society stakeholders would welcome any further opportunity to engage with OSTP and the administration on evaluating and assessing new proposals and plans.

Conclusion

Public AI infrastructure is a historic opportunity to strengthen American innovation. By expanding access to AI, we can drive prosperity, reinforce U.S. leadership, and ensure AI reflects our nation's diverse values. Just as past generations built the infrastructure that fueled American progress, we must now do the same for AI—ensuring that the next generation of great ideas can move as quickly as possible from garages to the global stage.

We stand ready to work with your administration to advance this vision and build an AI future that works for all Americans.

Respectfully,

The undersigned Public AI Network community members

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