



June 30, 2022

The Office of Science and Technology Policy &
The National Science Foundation
Attn: Jeri Hessman, NCO
2415 Eisenhower Avenue
Alexandria, VA 22314

Re: RFI Response: National AI Research Resource Interim Report

To Whom It May Concern:

The U.S. Chamber of Commerce's Technology Engagement Center ("C_TEC") appreciates the opportunity to submit comments to the Office of Science and Technology Policy (OSTP) and the National Science Foundation (NSF) Request for Information (RFI) on the "National AI Research Resource Interim Report."¹ C_TEC supports OSTP's and NSF's work to develop a National Artificial Intelligence Research Resource (NAIRR), which "will provide artificial intelligence (AI) researchers and students with access to computational resources, high-quality data, training tools, and user support."²

We wish to provide the below feedback, which further outlines our support on matters we addressed in our previous comments on OSTP and NSF's request for information on the "implementation plan for a National Artificial Intelligence Research resource."³

Federated, hybrid cloud-enabled computing resource:

Our previous comments to the "task force" highlighted the need for the National AI Research Resource to "prioritize developing a hybrid cloud platform that can provide a seamless user experience across multiple clouds."⁴ We strongly believe that only an accessible and easy-to-use hybrid- and multi-cloud computing resource, built on an open architecture that unites both public and private clouds with on-premise resources, can provide the necessary flexibility to provide the scientific community with the resources that are necessary to research at scale.

¹ <https://www.federalregister.gov/documents/2022/05/25/2022-11223/request-for-information-rfi-on-implementing-initial-findings-and-recommendations-of-the-national>

² <https://www.federalregister.gov/documents/2022/05/25/2022-11223/request-for-information-rfi-on-implementing-initial-findings-and-recommendations-of-the-national>

³ https://americaninnovators.com/advocacy/c_tec-comments-on-the-national-artificial-intelligence-research-resource/

⁴ https://americaninnovators.com/advocacy/c_tec-comments-on-the-national-artificial-intelligence-research-resource/

Data and models:

We strongly believe that "Open and Accessible Government Data"⁵ will significantly assist and spur further innovation and breakthroughs within the scientific community, which is why we would like to continue to emphasize the need for the research resource to include high-quality and trusted data sets that the scientific community can utilize. Furthermore, we would like to highlight the importance of the resource to develop pre-trained AI models that researchers can operate in a wide range of disciplines within the AI science technology landscape.

Software and tools:

C_TEC would like to highlight that the procurement of AI software and data management tools should be done in an open, transparent process. Furthermore, we would highlight the need for resources to be interoperable to allow scientists to utilize the research resource efficiently. That being said, we would continue to have concerns regarding the total homogenization of the resources as diversity ensures that researchers access the resources across multiple clouds and interfaces. Diversity is critical in allowing for quick utilization of the resources by researchers.

Education:

We would like to continue to advocate for the need to develop educational materials for researchers who may face challenges in learning how to use the resources. We believe researchers could be assisted by developing training material and workshops to assist them in utilizing the resource and could help accelerate their research. This is why we will continue to advocate for an open line of communication between government, industry, academia, and all stakeholders to learn best practices and necessary training to reduce the skills gap that may be required.

Conclusion

We appreciate NSF's and OSTP's ongoing work to develop NAIRR and efforts to listen to all stakeholders. We highly encourage continuing this critical dialogue with stakeholders to ensure that research resources can be utilized in a way that helps the United States be at the forefront of future scientific discovery. We thank you for considering these comments and would be happy to discuss any of these issues further.

Sincerely,



Director

Chamber Technology Engagement Center

⁵ <https://www.uschamber.com/technology/us-chamber-releases-artificial-intelligence-principles>

U.S. Chamber of Commerce