



## **Response to Request for Information on the Development of an Artificial Intelligence (AI) Action Plan as directed by Presidential Executive Order 14179**

Prepared and submitted by the Northern Virginia Technology Council (NVTC)  
March 14, 2025

*This document is approved for public dissemination. The document contains no business-proprietary or confidential information. Document contents may be reused by the government in developing the AI Action Plan and associated documents without attribution.*

### **About the Northern Virginia Technology Council (NVTC)**

The Northern Virginia Technology Council (NVTC) is an influential, vibrant, and collaborative technology and trade association with 500 member organizations. These members include Fortune 500 enterprises, high-growth start-ups, academic institutions, and nonprofits. NVTC members have a significant presence in the Mid-Atlantic region and a global reach through their products, services, and employees.



One of the nation’s largest and oldest tech councils, NVTC excels at convening and connecting its members, providing valuable tech-related content, and advocating for pro-business and technology policies. NVTC’s mission is to accelerate technology innovation and promote world-class workforce development to create a thriving technology ecosystem in the National Capital Region.

### **Bottom Line Up Front – The United States Will Dominate AI through Global Leadership in Data, Talent, Digital Infrastructure, and Standards/Regulations**

In his inaugural address, President Trump reminded us of the manifest destiny of the United States.

*Above all, my message to Americans today is that it is time for us to once again act with courage, vigor, and the vitality of history’s greatest civilization...*

*...The United States will once again consider itself a growing nation – one that increases our wealth, expands our territory, builds our cities, raises our expectations, and carries our flag into new and beautiful horizons.*

This response from the Northern Virginia Technology Council (NVTC) provides input to the U.S. Federal Government to apply this approach to developing and executing an Artificial Intelligence (AI) Action Plan (“Plan”).

As directed in Executive Order 14179, *“It is the policy of the United States to sustain and enhance America’s global AI dominance in order to promote human flourishing, economic competitiveness, and national security.”* NVTC’s response provides input into the development of the AI Action Plan to achieve this policy.

We believe that the transformational and disruptive nature of AI as part of an interconnected, global economy creates an environment where **the United States can sustain and enhance its AI dominance through global leadership of AI markets and technology**. In this paper we present four critical focus areas for AI dominance – data, talent, digital infrastructure, and standards and regulations. The strategic alignment of these critical focus areas to national priorities, driven by AI policies that demand



effective public-private partnerships, will ensure the United States retains enduring leadership in global AI dominance.

We believe that the U.S. Federal Government should apply AI technologies and systems to drive efficiency, streamline operations, and improve service levels to citizens while also ensuring a strong cybersecurity and national security posture.

Federal agencies operate in complex environments with data dispersed across multiple divisions, bureaus, and operating units. The lack of data interoperability hinders effective AI integration and innovation. We ask that a public/private partnership be established to create a structured digital environment for AI testing, risk management, and collaboration.

We have all heard the phrase, “A rising tide lifts all boats” to describe government economic policies that focus on promoting broad economic benefits. For policy recommendations in the AI Action Plan, NVTc believes that **“A rising tide lifts all boats, and United States leadership controls the tide.”**

### **Data – Accelerate Data Provision and Interoperability in AI**

Data are the primary elements with which AI systems learn, run algorithms, generate desired outputs, and improve performance over time. Policies that promote the usage of established risk management frameworks and recommend standards for model development and enhancement through the use of model cards will ultimately drive high-quality, carefully structured, and managed datasets crucial for training AI models, while ensuring privacy and security. The performance, reliability, trustworthiness, and fairness of AI systems depends on the quality and quantity of data on which models are trained, with poor-quality data leading to biased and inaccurate results.

The AI ecosystem rests upon provision of datasets for various aspects of economic, social, and political life. Currently, American science and engineering boasts some of the best datasets in the world. Expansive and demographically inclusive datasets allow innovative businesses and users to develop algorithms that can enhance productivity, from start-ups (e.g., a health app for a rare disease) to large commercial enterprises (e.g., a financial institution making efficient loans), and governments (providing services directly and efficiently to different demographics).

NVTC makes the following policy recommendations:

- **Expand inclusive datasets.** The government must remove restrictions that keep data in silos, except where firms collect proprietary datasets for commercial purposes. Well-developed datasets allow for reducing the size of the government while multiplying cost efficiencies across different sectors of the economy.
- **Balance privacy and provision.** The General Data Protection Regulation (GDPR) mechanism in the European Union, that provides a risk-averse and cautionary framework for data, is often critiqued for restricting data flows. The United States offers a more permissive environment, with safeguards through legal mechanisms and careful applications of technology (e.g., through anonymization and tokenization). The United States can continue to offer safe and trustworthy models of data privacy and provision to the world by defining clear policies for data owners that safeguard privacy and enhance security and trust in data systems.
- **Ensure interoperability of multimodal data.** AI systems incorporate various forms of data, including text, quantitative, audio, and computer vision data. Policies that allow for interoperable data across various modalities cater to product development and service provision. Intellectual property laws should balance protection with accessibility to foster fair competition.
- **Establish Data Standards Working Group** with federal agencies and commercial AI model builders to set minimum standards for the quality and quantity of data on which models are trained. Poor-quality data leads to biased and inaccurate results.

### **Talent – Bookend Strategy to Promote AI Literacy and Drive Innovation**

Regarding talent and workforce development, the United States should implement a bookend strategy that promotes AI Literacy to establish foundational knowledge of AI and Innovation through education, research, and development.

To promote overall AI literacy, organizations must define risk taxonomies that are transparent and understood by all stakeholders, with appropriate mitigation plans to help prioritize and address threats. Risk categories will vary based on AI use cases with commonalities in bias, cybersecurity, privacy, and safety. The NIST AI Risk Management

Framework emphasizes creating use-case-specific profiles to evaluate risks at various stages of the AI lifecycle. AI literacy programs should address all age groups and backgrounds with a particular emphasis on “AI Head Start” for early learning and development.

To drive innovation, the United States should leverage its critical advantage in talent pipelining and skills development. Investing substantially in STEM education at all levels is critical for building the United States’ future AI-ready workforce. Initiatives like nationwide student AI competitions, "innovation accelerator" fellowships modeled after successful startup incubators, and practical industry-academic apprenticeships are designed to train and deliver a new generation of AI talent. By cultivating and supporting skilled AI professionals, the United States can ensure continuous innovation and economic resilience.

Given the rapid development of AI, the United States must include emerging AI technologies as part of the Plan. We can expect the next generation of AI to include autonomous systems known as “agentic AI.” Industry analyst, Gartner, forecasts that 33% of companies will deploy agentic AI by 2028. These agents are particularly relevant in cybersecurity. Unlike generative AI, agentic AI operates autonomously, with minimal oversight, executing and making decisions without human prompts or guidance. It can be used to defend and attack networks.

NVTC makes the following policy recommendations:

- Similar to the Cybersecurity and Infrastructure Security Agency (CISA) that was created by President Trump in 2018, establish an **AI Leadership Task Force** to promote AI literacy and adoption.
- Leverage **higher education institutions and national laboratories** to drive AI innovation and applied research.
- Working with industry partners, establish **AI Leadership Projects** and promote AI as a tool to streamline government and improve services.
- Implement a **National AI Apprenticeship Program** connecting students and career-changers with technology companies for hands-on AI development experience.



- Direct the National Institute of Standards and Technology (NIST) to publish an **AI Taxonomy** with key concepts and classification of AI terms. This taxonomy should be broadly communicated.
- Develop an **AI Credentials Framework** that standardizes industry-recognized certifications to increase hiring efficiency and worker mobility across the AI ecosystem.
- Include **next generation AI systems**, particularly agentic AI, in the analysis and planning for commercial applications, civilian government, and defense.

### **Digital Infrastructure – Create an “AI Sandbox” through Public/Private Partnership**

The United States leads the world in key components of digital infrastructure, including data centers, cloud, energy, compute servers and storage. This infrastructure is critical to the United States maintaining its dominance in AI. However traditional digital infrastructure is insufficient to support the requirements and growth of AI. The primary constraint is energy. We need to generate more energy and distribute it more efficiently.

High-performance computing and digital infrastructure are critical to accelerating rapid AI development. Rather than building from scratch or relying solely on the commercial sector, the U.S. government can effectively expand its current national laboratories and federally supported technology centers to enhance computational capabilities, data-sharing security, and experimental platforms, thereby augmenting commercial offerings. Continued investment in such infrastructure ensures the swift transition from innovative concepts to market-ready solutions, sustaining U.S. leadership in AI.

To achieve AI dominance, federal agencies must act quickly and drive adoption. The goal is not to remove AI guardrails, but to streamline the process, ensuring AI progresses efficiently through development, testing, integration, and deployment while maintaining safety and responsibility. AI is revolutionizing government operations by enhancing efficiency, innovation, and productivity, allowing employees to focus on high-value creative tasks while minimizing repetitive work, thus achieving efficiency by doing more with less. However, to maximize AI’s benefits while mitigating

associated risks, a structured approach that integrates best practices from both the public and private sectors is essential.

NVTC makes the following policy recommendations:

- Working with industry partners, establish a **Federal AI Sandbox**, a strategic initiative aimed at fostering responsible, secure, and ethical AI practices within federal government agencies. The Federal AI Sandbox provides a controlled environment where AI solutions can be tested, refined, and deployed securely, leveraging cross-sector collaboration for enhanced risk management and operational effectiveness.
- Require **energy regulatory bodies** to actively engage with power utilities to increase power generation and implement enhanced energy transmission and distribution to support AI.
- Develop **energy efficiency metrics for AI systems** (similar to Power Usage Effectiveness (PUE) for data centers) and use the metrics to evaluate the costs and benefits of AI systems.
- Evaluate regulations regarding **onsite power generation and storage** at data centers including fuel cells, small modular reactors (SMRs), microgrids, and energy storage systems.

### **Standards and Regulations – “Transparent and Verified”**

Similar to the Internet Era, the United States needs to lead the development of global standards and regulations for AI in order to dominate the AI market. These guardrails should promote the growth of AI for the United States and limit the use of AI by criminal organizations and nation-states. Overly restrictive AI regulations may stifle innovation and hinder U.S. competitiveness. Instead of broad, preemptive restrictions, policies should focus on outcomes, leveraging existing laws to address harmful AI use. Business-led standards can promote responsible AI. A flexible, targeted approach will maximize the benefits of AI while effectively mitigating potential risks. We advocate for applying the historical “trust but verify” model to AI to become “transparent and verified.”

To achieve AI dominance, the U.S. government needs to ensure there is a clear and consistent legal, standards, and regulatory landscape that encourages and enables the development, implementation, and progress of AI while providing realistic and necessary protections for and controls on the development and use of AI systems. This includes whether AI-created works can be copyrighted, as well as the collection, use, and transmission of a person's personally identifiable information (PII), the rules around the copying and use of data and information protected by intellectual property (IP) protections.

Leveraging AI principles published by the National Institute of Standards and Technology (NIST), the NVTC believes that AI must be **explainable** (it supplies evidence, support, or reasoning related to an outcome from or a process of an AI system), **meaningful** (the intended recipient understands the system's explanations), **accurate** (explanations that are intelligible to the intended audience), and have documented **knowledge limits** (a system is operating within the scope of its design and knowledge boundaries). The result of these principles is that AI that is being used to provide information for a specific set of tasks will be using models that have been trained on appropriate data sources.

NVTC makes the following policy recommendations:

- AI models need to be **clearly labeled** regarding the design, data sources used to train the model, and potential risks, and include usage warnings and expirations.
- The United States should convene an **AI Standards and Interoperability Board** made up of government, business, and academia to define and promote technical standards and benchmarks for AI.
- Require **published documentation** made broadly available and free for AI systems prior to their commercial usage.
- Establish guidelines and frameworks for **emerging AI technologies** including agentic AI. Iterate on these guidelines and frameworks as the technology evolves.
- A patchwork of state and local AI regulations creates confusion, increases costs, and slows innovation. Policymakers should establish a unified **Federal AI**



**Framework** that preempts conflicting local laws while allowing states to encourage AI investment and research.

- Companies need access to data to develop and refine AI models, but costly licensing and fragmented privacy laws create unnecessary barriers. A **National Data Privacy Framework** will reduce compliance costs and support data-driven innovation. Intellectual property laws should balance protection with accessibility to foster fair competition.

### **Communication is Critical**

The United States has a tremendous opportunity to maintain and expand its dominance in AI through the policies listed in the paper. However, communication is critical for the U.S. to succeed. We must communicate our commitment to AI leadership and demonstrate that commitment through national and global initiatives.

### **Continued Dialogue**

NVTC welcomes further discussion with appropriate federal organizations on the AI Action Plan. Our membership offers a compelling and unique resource.

Jennifer Taylor  
President and CEO  
Northern Virginia Technology Council (NVTC)  
jtaylor@nvtc.org