

March 13, 2025

AI Action Plan  
Attn: Faisal D'Souza, NCO  
2415 Eisenhower Avenue  
Alexandria, VA 22314  
Submitted via email to [ostp-ai-rfi@nitrd.gov](mailto:ostp-ai-rfi@nitrd.gov)

**Re: AI Action Plan**

Dear Mr. D'Souza:

The Allen Institute for Artificial Intelligence (Ai2) appreciates the opportunity to provide comments in response to the Request for Information (RFI) on the Development of an Artificial Intelligence (AI) Action Plan (90 FR 9088). Ai2 is a nonprofit AI institute founded in 2014 by the late Paul Allen. As the organization's CEO, I am proud to lead a team of America's brightest AI researchers and engineers in developing foundational AI research and innovation to deliver real-world impact through large-scale open models, data, algorithms, and more. Our most recent achievements include:

- Tülu 3 405B, the first application of fully open post-training recipes to the largest open-weight models, **surpassing the performance of DeepSeek V3**.
- OLMo 2, a leading language model comparable to the best open-weight models like Meta's Llama 3.1 and **equaling the performance of Alibaba's Qwen 2.5**, yet singular in sharing all underlying data and code to spur innovation and the next generation of AI systems.
- OLMoE, a state-of-the-art mixture-of-experts model now available as an iPhone app for private, local usage and a fully open codebase for on-device deployment.
- Molmo, a state-of-the-art vision language model surpassing Meta's Llama 3.2 Vision and **Alibaba's Qwen 2 VL performance on image understanding**.

These achievements are built on the free and open sharing of data, models, and technical approaches, and show what is possible through innovation in an open ecosystem.

At Ai2, we believe that stronger national AI capabilities depend on a wide range of competing open models. America has a head start on AI, but we cannot outpace and out-innovate the world without an open ecosystem of AI research and development spanning industry, academia, and philanthropy. There is a clear need for increased investment in America's world-class research institutions and policymaking to enable their efforts to solidify the nation's position as the leader in AI.

## Recommendations

We offer the following recommendations in response to the RFI:

1. **Invest in a truly open ecosystem of innovation** on American soil by funding multiple types of institutions, fostering cross-domain collaboration and sharing of essential AI development artifacts (e.g. models, data, code, and more), and building the strongest AI in the U.S. for the benefit of Americans.
2. **Eliminate unnecessarily burdensome requirements** by steering regulatory bodies away from interventions that unintentionally hamper progress on developing AI to enable Americans to thrive.

## Innovation through an open ecosystem

The recent boom in AI progress and its economic benefits builds almost entirely on *open* developments coming out of public companies, universities, startups, and non-profits. The U.S. has dominated this space due to longstanding investment in an ecosystem that prioritizes fundamental progress on general technologies and sharing them well before any profitability.

Only in the last few years has AI become an intense focus of some of the world's largest companies. Competitive pressures have shifted investment away from fundamental AI research to that of products. These pressures have also reduced sharing of information to prevent competitors from catching up. *The success of AI is built on open innovations, and we need to reprioritize openness if we want the next generation of AI breakthroughs to continue to happen on American soil.*

Fostering fundamental developments is a long-term project, but we're seeing substantial adoption of early open standards in AI. Just a few weeks ago, the Chinese company DeepSeek AI released an AI model that caught the Western world by surprise. There are countless innovations in open models from China that American companies are now using. With the correct investments in infrastructure and talent that prioritize *open* innovation, the U.S. can win this vector of influence and be the platform of future progress.

As AI becomes more powerful and political, there can be new forms of national security risk to using models that are influenced by foreign governments. The American model of the internet, prioritizing openness and freedom, will make it nearly impossible to stop Americans from using open AI models from other nations. The cost of training leading AI models is falling rapidly, as seen with DeepSeek V3, so many will be able to train strong models. We should invest in coalitions within the U.S. that can openly make leading models that the entire world relies upon – building a platform for values and innovation for the years to come.

Strategic and robust investment in open models and interfaces allows America's brightest innovators to improve, customize, and strengthen them, while promoting our national security. An American open-source AI ecosystem is one that simultaneously builds strong capabilities and defenses by working together across many stakeholders to collaboratively advance the state of the art of AI. Private, for-profit interests cannot be relied upon for a crucial technology to America's security. By investing in the open ecosystem, we keep the best AI talent in the U.S., where Americans benefit from the economic multiplier of the ecosystem's effects.

### **Eliminate unnecessarily burdensome requirements**

We encourage the administration to keep a careful focus on regulations that could unintentionally hamper the progress of open innovation in AI. AI is a rapidly evolving technology and the best use cases for AI are only just now starting to come into focus. Over-regulating AI now means we may never see those fully optimized AI use cases emerge in America. The best way to address potential concerns about an emerging technology is not regulation, but innovation and competition. Top-down regulation could slow progress because it locks in static assumptions about how AI should develop. In AI, these assumptions are quickly overtaken by the dynamism of reality. As a result, heavy-handed government intervention may only ensure that AI upsides are never realized. Premature regulation may stifle the most beneficial use cases, or worse, force domestic AI on to permanently inefficient developmental paths. In keeping with the American tradition, open innovation and market-driven solutions are the most effective way to find the right balance between protection and creation. Researchers, industry, and the American public need time to shape AI's evolution together. Overly restrictive regulations will put American AI at a strategic disadvantage to other countries like China that take a more permissive approach. The future of continued U.S. leadership in AI depends on *innovation at scale* – and America's openness is the critical edge it has over global competitors in Europe and Asia.

At Ai2, we prioritize building *truly* open AI systems. These state-of-the-art systems expose every part of the code, data, and model weights available along with rich documentation. We believe that the only way to foster the long-term growth of the ecosystem is to make every single piece of the AI process available to new entrants who will innovate in ways no single company or organization or country acting alone can achieve.

AI is developing and improving at an astounding pace. We believe our recommendations allow for the flourishing of AI innovation within the administration's stated priorities. I appreciate the opportunity to share Ai2's thoughts and extend an offer to explore further.

Regards,

**Ali Farhadi, CEO**

**The Allen Institute for Artificial Intelligence**

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