

September 1, 2021

National AI Research Resource Task Force
Attn: Ms. Wendy Wigen, NCO, NITRD Program
2415 Eisenhower Avenue
Alexandria, Virginia 22314

RFI Response: National AI Research Resource (NAIRR)

Dear Members of the National AI Research Resource Task Force,

Engine is a non-profit technology policy, research, and advocacy organization that bridges the gap between policymakers and startups. Engine works with government and a community of thousands of high-technology, growth-oriented startups across the nation to support the development of technology entrepreneurship through economic research, policy analysis, and advocacy on local and national issues. We appreciate the opportunity to comment on the development of NAIRR. AI research and development can be prohibitively expensive and out of reach for many startups operating on bootstrap budgets.¹ The establishment of NAIRR has the opportunity to foster competition and innovation by creating opportunities for startups to work in the AI space without incurring all of the R&D costs associated with AI development.

Question 1, Item A on goals for establishment and sustainment of NAIRR and metrics for success

The creation of NAIRR is a tremendous opportunity to encourage innovation and boost competition in AI. AI R&D is an incredibly data-heavy and resource-intensive undertaking, which makes it inaccessible for many startups. According to an Engine report from earlier this year, the average seed-stage startup is working with about \$55,000 in monthly capital.² Outside of places like Silicon Valley, this figure drops below \$50,000 per month.³ Because of the expense associated with AI R&D and their tight budgets, some startups in the AI space rely on grants and other small chunks of funding to carry them through to their next formal funding round.⁴

To ensure that NAIRR can boost innovation and competition, the Task Force must count startups as beneficiaries and make NAIRR available to them. This goal of startup access is aligned with the vision of the program as articulated by the authors of the law. When the House passed the National

¹ See, e.g., Ivy Nguyen, “Could data costs kill your AI startup?,” VentureBeat, Nov. 10, 2018, <https://venturebeat.com/2018/11/10/could-data-costs-kill-your-ai-startup/>, (conceptually walking through the data value chain).

² “the State of the Startup Ecosystem,” Engine, Apr. 2021, <https://static1.squarespace.com/static/571681753c44d835a440c8b5/t/60819983b7f8be1a2a99972d/1619106194054/The+State+of+the+Startup+Ecosystem.pdf>.

³ Ibid.

⁴ Edward Graham, “#StartupsEverywhere: Owings Mills, MD.,” Engine, Oct. 2, 2020, <https://www.engine.is/news/startupseverywhere-owings-mills-md-sofia-labs>.

AI Research Resource Task Force Act as part of the National Defense Authorization Act for Fiscal Year 2021⁵ and again when the House passed the conferenced version of the NDAA⁶, Rep. Anna Eshoo (D-Calif.) included private companies when describing beneficiaries of NAIRR: “The national AI research cloud expands access so that American universities and companies can participate in AI R&D.”

Question 1, Item C on a model for governance and oversight

If startups are going to be a beneficiary of NAIRR, it’s critical that members of the startup ecosystem should have a seat at the table as the Task Force considers questions about strategic direction and programmatic decisions. This will also make the program more dynamic and responsive to practical issues as it continues, ensuring it’s continued utility for startups and the promotion of innovation. The Task Force should consider seeking out the perspectives of ecosystem support organizations (ESOs)—such as incubators, accelerators, and startup-related non-profits—to get an overarching view of the startup perspective.

Question 1, Item E on barriers to the dissemination and use of high-quality government data sets

Many government datasets at present are inaccessible to many stakeholders that could derive value from them. The Task Force should seek to avoid this issue as it establishes a roadmap for NAIRR. Practical access should be facilitated for stakeholders seeking to use NAIRR, including by startups for commercial uses. This should include proactive outreach to startups and members of the startup ecosystem (ESOs) and the provision of workshops regarding the use of NAIRR.

Question 5 on the role of public-private partnerships in NAIRR

As laid out above, startups should have access to NAIRR for commercial use. There is a long history of private entities, including businesses, making use of government data for things like market research, investment planning, and other business functions. Indeed, the OPEN Government Data Act specifically enumerates the facilitation of data use for non-government entities including businesses.⁷ NAIRR should be no different.

Public-Private partnerships can also play an important role in the reach, effectiveness, and success of NAIRR. The government should conduct proactive outreach to stakeholders, including startups, that could benefit from NAIRR. This outreach should leverage members of the startup ecosystem like ESOs that startups turn to for information and resources. Many government agencies, from the Small Business Administration, to the Patent and Trademark Office, to the Census Bureau, conduct outreach, hold webinars, and host workshops aimed at increasing the use of their programs.

⁵ 166 Cong. Rec. H3501 (Jul. 20, 2020) (statement of Rep. Eshoo)

⁶ 166 Cong. Rec. H6932 (Dec. 8, 2020) (statement of Rep. Eshoo)

⁷ “Public Law 115–435: OPEN Government Data Act.” (132 Stat. 5536; Jan. 14, 2019)

Question 6 on democratizing access to AI R&D

As explained in response to Question 1, Item E and in response to Question 5, above, startups can only be benefitted by government resources and programming if they know about it. In order for NAIRR to be effective in fostering innovation and promoting competition in the AI space, the government must facilitate access for startups, including through proactive outreach. This could include promoting NAIRR at startup-facing events like conferences and hackathons as well as introducing ecosystem support organizations across the country to NAIRR so they can educate the startups in their respective networks. Consulting with ecosystem support organizations as the Task Force prepares a roadmap would likely generate additional engagement opportunities.

Thank you for your work on developing the roadmap for NAIRR and the opportunity to submit input.

Sincerely,

Engine

Engine
700 Pennsylvania Ave. SE
Washington, DC 20003