

December 26, 2025

Stacy Murphy
Deputy Chief Operations Officer and Security Officer
White House Office of Science and Technology Policy (OSTP)
1650 Pennsylvania Avenue, NW
Washington, DC 20502

Re: Business Roundtable Response to Request for Information (RFI) on Accelerating the American Scientific Enterprise

Dear Ms. Murphy,

These comments are submitted on behalf of Business Roundtable, an association of more than 200 chief executive officers (CEOs) of America's leading companies, representing nearly every sector of the U.S. economy. Business Roundtable CEOs lead U.S.-based companies that support one in four American jobs and almost a quarter of U.S. GDP. We appreciate the opportunity to respond to the Office of Science and Technology Policy's (OSTP) Request for Information (RFI) on Accelerating the American Scientific Enterprise.

Business Roundtable members are among the world's leading drivers of scientific and technological advancement, including the development and deployment of AI, and are committed to ensuring the United States remains at the forefront of global scientific innovation and deployment.

The United States has long been the world's undisputed innovation leader, rapidly developing next generation technologies that generate immeasurable value for the global economy and consumers. Several factors have contributed to the strong U.S. innovation ecosystem, including:

- Reliable funding through access to private sector capital markets;
- Sustained federal support, especially for accelerating foundational advances in science and technology;
- Rule of law, including strong intellectual property protections;
- Robust talent pipelines, including from universities and through high-skilled immigration;
- Access to markets as innovations are commercialized, both domestically and internationally; and
- A culture that supports risk-taking and entrepreneurship.

Business Roundtable looks forward to working with the Administration to expand and accelerate America's scientific enterprise and the innovation infrastructure necessary to drive the next generation of transformative technologies, including through the Genesis Mission and implementation of the AI Action Plan. Below, we provide responses to several of OSTP's questions in the RFI.

Question 1: What policy changes to Federal funding mechanisms, procurement processes, or partnership authorities would enable stronger public-private collaboration and allow America to tap into its vast private sector to better drive use-inspired basic and early-stage applied research?

Business Roundtable welcomes the launch of the Genesis Mission, which is an important step to integrate rapidly evolving technology development from the U.S. private sector with world class government facilities. AI is critical to U.S. competitiveness, and this effort underscores the importance of public-private partnerships (PPPs) and broad access to AI infrastructure to accelerate a new wave of scientific discovery. America's ability to lead in AI, as part of the American scientific enterprise, will shape its competitive standing for decades.

Business Roundtable views strong and well-structured PPPs as essential to the United States' ability to meet major national challenges, including accelerating and sustaining the American scientific enterprise. The federal government should enable easier collaboration between industry and the public sector through clear agreements regarding joint research, which will enhance operational collaboration and reduce barriers to the creation of new PPPs. The federal government should also consider new models to facilitate impactful collaboration, including by establishing partnership programs that encourage milestone-based incentives; applying science-driven rigor to the evaluation of technology capabilities; and offering incentives for companies to partner with universities on riskier projects for which businesses have differentiating data. The federal government could also choose strategic areas of research and facilitate matching of companies and research groups, encouraging strategically valuable, novel research.

Expanding access to AI innovation infrastructure is key to strong public-private collaboration that drives transformative research outcomes across scientific disciplines. The federal government should ensure that U.S. researchers have reliable access to cutting-edge innovation infrastructure, including secure high-capacity computing resources, domain-specific models for basic research, curated high-quality data, advanced scientific equipment and instruments, and modern research facilities. Business Roundtable supports the National Artificial Intelligence Research Resource (NAIRR), an important initiative connecting U.S. researchers and educators to the computational, data and training resources needed to advance AI research and research that employs AI. We look forward to seeing the evolution of the successful NAIRR pilot into a standing resource for the nation.

Reliable funding through access to private sector capital markets along with sustained federal support is especially important for foundational science and technology. The federal government should ensure that both basic research and early-stage applied research are properly funded. Specifically, the federal government must make strategic, sustained investments in foundational science and technology, including through research grants and fellowships. The federal government should fund a wide range of early-stage research, including research focused on the creation and curation of scientific data, rather than focusing funding on research that has already shown promising results.

Question 2: How can the Federal government better support the translation of scientific discoveries from academia, national laboratories, and other research institutions into practical applications? Specifically, what changes to technology transfer policies, translational programs, or commercial incentives would accelerate the path from laboratory to market?

Translation of scientific discoveries into practical applications is critical to ensure all Americans reap the benefit of federally funded research. The federal government should engage private sector stakeholders in the development of federal research agendas to ensure that research is aligned with market needs, innovation trends and current technology landscapes.

Business Roundtable recommends incentivizing translational programs and public-private consortia that focus on real-world deployment and scaling of innovations. For example, the federal government should expand industry–university collaborative research centers, including and building on NSF’s Engineering Research Centers and Industry-University Cooperative Research Centers to link early-stage science with commercialization pathways. The expanded access to federal labs referenced in the response to Question 1 would also enable federal labs to be used as testbeds where companies can pilot emerging technologies with access to federal expertise and infrastructure.

Patents are an essential tool for incentivizing investment in research, enabling commercialization and supporting knowledge diffusion. Business Roundtable has long supported the Bayh-Dole Act and the public-private partnerships it enables. The intellectual property regime established under the Act propels new inventions, the adoption of new technologies and even the creation of new industries. To promote a strong patent system, Business Roundtable encourages the federal government to avoid harmful policies that impose additional burdens on patent holders, such as an approach charging fees based on a patent’s value. Imposing fees tied to the appraised value of patent portfolios would create a new and unpredictable cost burden on American innovators, essentially an innovation tax, while offering no clear policy benefit. In practice, such a system would be extremely difficult to administer, as determining the value of individual patents or entire portfolios is inherently subjective and highly variable across industries, markets and stages of commercialization. When considering changes to the model, the federal government should consider the benefits from such an approach across industry, academia and government.

Question 3: What policies would encourage the formation and scaling of regional innovation ecosystems that connect local businesses, universities, educational institutions, and the local workforce—particularly in areas where the Federal government has existing research assets like national laboratories or federally-funded research centers?

Business Roundtable supports the development and scaling of regional innovation ecosystems through enabling innovation infrastructure and strong talent pipelines. Business Roundtable members are an important partner in building such ecosystems and look forward to working with the Administration to ensure that public and private sector investments in our national scientific enterprise bring economic benefits across the country.

To efficiently build and renew infrastructure important for innovation, the federal government should:

- Coordinate with state and local governments to streamline permitting processes for infrastructure projects;
- Increase access to energy through expanded generation and transmission capacity;
- Improve access to broadband and remote devices; and
- Build regional capacity around compute and other technical resources.

The federal government should work with state and local partners and the private sector to develop a repeatable, scalable and secure model for revitalizing local innovation ecosystems to ensure that the successful buildout of innovation-enabling infrastructure in one region can be replicated nationwide.

Building scalable local talent pipelines to provide access to innovation-driven jobs is another important enabler of success for regional innovation ecosystems. Government-led initiatives like the NSF Regional Innovation Engines program provide successful models for federal investments that cultivate partnerships across stakeholders, spur talent development and upskilling, and create innovation-driven jobs in critical technology areas. Programs fostering regional innovation ecosystems should be supported and more broadly scaled across the country to maximize impact.

Business Roundtable members are creating local partnerships to develop strong talent pipelines to fill roles critical to American innovation. For example:

- In Connecticut, Stanley Black & Decker and Accenture are part of a statewide initiative to rapidly close the high-tech skills gap in spaces like data analytics, cybersecurity and software development. The initiative is developing talent to fill roles across sectors through partnerships with the Connecticut State Colleges & Universities System (which

includes community colleges and state colleges), private colleges and state government.¹

- In Wisconsin, Cisco and Rockwell Automation partnered with the University of Wisconsin-Milwaukee to launch the Connected Systems Institute, a center of excellence in next-generation manufacturing powered by digital tools.
- The Microsoft TechSpark initiative partners with universities and nonprofits in communities around the country to provide digital and AI skills to students and jobseekers and to empower startups and organizations to build AI-driven solutions, connecting upskilled workers with new job opportunities. This initiative, with national reach and localized impact, presents an effective model for building talent pipelines and expanding participation in regional innovation ecosystems.

We applaud the Administration's focus on these important partnership-driven programs across government and industry and its commitment to building regional innovation ecosystems.

Question 9: What specific Federal statutes, regulations, or policies create unnecessary barriers to scientific research or the deployment of research outcomes? Please describe the barrier, its impact on scientific progress, and potential remedies that would preserve legitimate policy objectives while enabling innovation.

Business Roundtable appreciates the Administration's efforts to reduce unnecessary regulatory barriers to scientific research. As noted in our October 2025 response to the RFI on Regulatory Reform on Artificial Intelligence,² outdated, fragmented or unclear regulatory expectations can slow down development and deter responsible development and deployment of new technologies. For example, the proliferation of state regulations in AI and data privacy is creating a costly patchwork of compliance burden that risks hampering companies' ability to innovate.

In areas where regulation is necessary to provide the certainty and clarity necessary to deploy and/or commercialize research outcomes, Business Roundtable supports a federal standard rather than a patchwork of overlapping and conflicting state regulations. Business Roundtable strongly supports federal preemption of fragmented and proliferating state AI laws and the establishment of a national AI framework. Business Roundtable looks forward to working with the Administration and Congress on legislation establishing a federal AI standard. A single, cohesive framework that provides appropriate guardrails would strengthen American

¹ See Business Roundtable's *The WPI Playbook: How Business-Education Partnerships Prepare Tomorrow's Talent* (June 17, 2025), <https://www.businessroundtable.org/the-wpi-playbook-how-business-education-partnerships-prepare-tomorrows-talent>

² See *Business Roundtable Response to Request for Information on Regulatory Reform on Artificial Intelligence* (October 2025), <https://www.businessroundtable.org/business-roundtable-response-to-request-for-information-on-regulatory-reform-on-artificial-intelligence>

leadership in AI development and deployment. Likewise, Business Roundtable supports enactment of a comprehensive, preemptive federal consumer data privacy law that both strengthens protections for consumers and enables continued innovation and growth in the digital economy.

Business Roundtable encourages the Administration to establish formal processes for creating regulatory sandboxes to support businesses in scientific research, as well as for securely developing and deploying emerging technologies. These sandboxes would allow companies to apply for targeted modifications or waivers to existing regulations, enabling innovation without waiting for full-scale regulatory reform. This approach would also reduce legal uncertainty and mitigate liability concerns that otherwise come with deregulation by offering clear, affirmative regulatory approval.

Business Roundtable also supports permitting reform to speed the modernization and expansion of innovation infrastructure. Permitting delays are a major barrier: federal environmental impact statements take over two years on average, slowing construction of data centers and other innovation infrastructure. Codifying NEPA categorical exclusions for new and existing facilities, allowing a mutual recognition permitting approval process for federal, state and local applications, establishing shot clocks, and requiring permitting authorities to establish a single point of contact would all facilitate the development of regional innovation infrastructure.

Question 12: What policy mechanisms would ensure that the benefits of federally-funded research—including access to resulting technologies, economic opportunities, and improved quality of life—reach all Americans?

Federally funded research has long delivered breakthrough technologies that strengthen U.S. competitiveness and improve quality of life for all Americans. For example:

- Foundational investments by the Department of Defense and the National Institute of Standards and Technology (NIST) enabled the creation of GPS;
- National Institutes of Health research underpinned the development of cancer immunotherapies, as well as in the scientific advances that enabled GLP-1 therapies now used to address diabetes and obesity; and
- NIST and U.S. Army-supported research helped advance display technologies that power modern consumer devices.

AI is a force multiplier for several scientific breakthroughs in research, including transforming how scientists digest and communicate knowledge; generate, extract, and annotate scientific datasets; perform experiments; model complex systems; and identify novel solutions. For example, AI is accelerating drug discoveries by enabling large-scale simulations for trial and error and unlocking new pathways for innovation. By studying the reasoning pattern of AI models, pharmaceutical companies can develop a more systematic approach to discovering

new medicines. AI in patient monitoring enables rapid analysis of large, complex data streams, generating unique research insights and enabling personalized therapy through closed-loop algorithms – ultimately leading to high-quality clinical care. AI holds the potential to accelerate innovation across domains by scaling up existing innovation processes and unlocking new methods of discovery.

To ensure future federally funded research continues to translate into transformative technologies while protecting the rights of all American innovators, policymakers should review intellectual property (IP) frameworks to ensure balanced incentives across industry, academia and government. Clarifying IP frameworks, including for use of data with AI technologies, will strengthen incentives for investment, support commercialization of emerging technologies and maintain U.S. leadership.

In addition, overly lengthy and burdensome release reviews can limit the ability of researchers at federally funded research and development centers (FFRDCs) to quickly publish findings, minimizing scientific impact in fast-moving fields such as AI and machine learning research. Efforts to responsibly accelerate research security reviews at FFRDCs can maximize the value of these federal research organizations. The federal government should prioritize continuity for long-term projects to ensure that federal funding is not discontinued during the research process, forfeiting public access to research results.

Question 13: How can the Federal government strengthen research security to protect sensitive technologies and dual-use research while minimizing compliance burdens on researchers?

Business Roundtable strongly supports efforts by the Administration to strengthen research security across the American scientific enterprise. Enhanced research security is essential to ensuring that adversaries cannot gain access to sensitive information or technologies that could be used to harm Americans or undermine national security and to preventing the theft of intellectual property that threatens U.S. economic security. At the same time, research security frameworks should preserve and promote strategic international cooperation, enabling collaboration with trusted partners, while maintaining strong safeguards.

Business Roundtable supports increased, foundational cybersecurity and AI security protections for agencies that conduct research, especially to protect sensitive business information or intellectual property. Federal agencies – particularly those conducting research related to sensitive and dual-use technologies – must be able to protect their information technology (IT) systems and AI ecosystems from malicious threat actors, especially to protect sensitive business information or intellectual property. The federal government should:

- Enable phishing-resistant authentication;
- Implement identity proofing solutions for all personnel accessing research environments;

- Recruit and retain the cybersecurity workforce needed to develop, operate and maintain secure systems;
- Increase the use of secure, cloud-based computing architectures; and
- Develop standards and best practices that strengthen cybersecurity across the supply chain.

Moreover, since PPPs play a critical role in advancing scientific research, the federal government should promote the cybersecurity posture of private-sector research partners throughout the supply chain to enhance shared resilience and minimize security risks. This includes promoting voluntary adoption of best practices and risk management frameworks, such as those produced by NIST.

Different types of research projects face distinct security risks. To ensure research security policies address specific concerns without imposing broad compliance burdens across the entire American scientific enterprise, the federal government should embrace a risk-based research security model that focuses on clearly scoped categories of high-risk, sensitive or dual-use technologies. In some cases, federal research security policies may also need to be tailored for individual sectors. Robust privacy and security frameworks already exist in many high-risk contexts and individual sectors, and the federal government should build on successful data sharing policies and expand them across relevant research use cases. For example:

- The healthcare sector requires particularly strong safeguards to maintain the privacy and confidentiality of Protected Health Information, consistent with established and robust federal and state requirements. To support this, the federal government should promote secure, privacy-preserving data systems for research and leverage existing policies that facilitate data sharing among all appropriate healthcare stakeholders, in accordance with existing laws and regulations, to strengthen responsible data access for research purposes.
- Biotechnology research intersects with Chemical, Biological, Radiological, and Nuclear (CBRN) risk when advanced tools or data could be misused to engineer pathogens or toxins, requiring stringent safeguards and oversight. As such, effective CBRN risk management demands integrated strategies—combining biosafety, biosecurity and AI governance—to prevent capability uplift for adversarial actors seeking chemical or biological weapons.

Conclusion

U.S. global leadership in innovation depends on a strong, well-coordinated partnership between government, industry and the research community. Business Roundtable stands ready to work with the Administration and OSTP to advance the Genesis Mission and other initiatives to strengthen the nation's scientific enterprise and ensure that federal policies reinforce the translation of discovery into real-world impact. By modernizing research infrastructure, unlocking public-private collaboration, protecting intellectual property, and

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adapting a smart, risk-based regulatory approach, the United States can accelerate breakthrough innovation and expand economic opportunity for all Americans.

Business Roundtable appreciates your consideration of our comments and looks forward to working with the Administration to accelerate the American scientific enterprise. For any questions, please contact Amy Shuart, Vice President of Technology & Innovation, Business Roundtable, at ashuart@brt.org or (202) 496-3290.