

March 14, 2024

The Honorable Alan Davidson
Administrator
National Telecommunications and Information Administration (NTIA)
1401 Constitution Ave, NW
Washington, D.C. 20230

RE: Request for Comment (RFC) related to Dual Use Foundation Artificial Intelligence Models
Widely Available Model Weights (NTIA–2023–0009)

Dear Administrator Davidson:

The undersigned organizations, representing all sectors of the economy, including the users and developers of Artificial Intelligence (“AI”), respectfully request that the National Telecommunications and Information Administration (“NTIA”) grant at least a 60-day extension of the comment period for submitting information regarding NTIA’s “Dual Use Foundation Artificial Intelligence Models Widely Available Model Weights¹”

The RFC solicits feedback on a wide-ranging set of critical areas, including questions about properly defining “open” or “widely available” foundation models. Furthermore, because of the broad scope of the proposed questions asked within the request, additional time will be necessary for stakeholders to provide meaningful and thoughtful input due to the breadth of the request. For this reason, it is imperative that NTIA give an extension.

We appreciate the opportunity to work with NTIA to provide detailed feedback on these complex issues. However, doing so with the level of specificity that these questions require will necessitate extending the comment period to allow for more thoughtful and substantive feedback.

Given the complex policy and technical issues associated with the RFC, we respectfully request a 60-day extension to allow stakeholders to provide thorough and insightful comments to inform policies aimed at maximizing AI utilization while ensuring AI’s trustworthiness.

We stand ready to discuss these concerns in greater detail.

Sincerely,

Software & Information Industry Association (SIIA)
Computer & Communications Industry Association (CCIA)
Enterprise Cloud Coalition
U.S. Chamber of Commerce

¹ [Dual Use Foundation Artificial Intelligence Models with Widely Available Model Weights | National Telecommunications and Information Administration \(ntia.gov\)](https://www.ntia.gov/dual-use-foundation-artificial-intelligence-models-widely-available-model-weights)