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Mr. Faisal D'Souza
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Re: AI Action Plan

Below is the Multicultural Media, Telecom and Internet Council's response to the Office of Science and Technology Policy (OSTP) and Networking and Information Technology Research and Development (NITRD) National Coordination Office's Request for Information regarding the development of an Artificial Intelligence (AI) Action Plan as directed by Presidential Executive Order 14179.

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Sincerely,

Kenley Joseph

Kenley Joseph
Tech and Telecom Policy Counsel

Attachment: MMTC Response to AI Action Plan Request for Information

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I. Introduction and Summary

On behalf of the Multicultural Media, Telecom and Internet Council (MMTC), we appreciate the opportunity to provide input to the Office of Science and Technology Policy (OSTP) and Networking and Information Technology Research and Development (NITRD) National Coordination Office regarding the development of an Artificial Intelligence (AI) Action Plan as directed by Presidential Executive Order 14179.[1]

Since 1986, MMTC has served as a leading public interest technology organization fighting for equal access and representation in technology, media, and telecommunications through opportunity creation, awareness building, and advocacy. As the leading voice for communities of color and other marginalized groups in the nation's most important industries, we bring nearly four decades of experience working at the intersection of technology, civil rights, and economic empowerment.

MMTC believes that American leadership in AI requires harnessing our nation's full innovative potential. Our recommendations focus on concrete policy actions that will strengthen America's

[1] Request for Information on the Development of an Artificial Intelligence (AI) Action Plan, 90 Fed. Reg. 9088 (Feb. 6, 2025).

competitive edge in AI through multi-perspective development practices that expand markets, mitigate risks, and reduce unnecessary regulatory burdens. By ensuring AI works for all Americans, we can accelerate innovation while avoiding costly pitfalls and market failures that result from narrowly developed systems.

Our recommendations for the AI Action Plan include:

- Establishing structured public-private partnerships through AI Innovation Zones in multicultural communities and shared testing environments through NIST
- Creating industry-led data trusts with community oversight to expand diverse training data while respecting privacy and sovereignty
- Building talent pipelines through AI Centers of Excellence at HBCUs and MSIs, expanded apprenticeship programs, and K-12 AI literacy initiatives
- Developing balanced regulatory frameworks including industry-led standards with multicultural stakeholder participation, safe harbor provisions, and independent assessment methodologies
- Implementing metrics for measuring AI system performance across diverse populations to drive market-based improvements without imposing unnecessary regulatory burdens

These practical, market-driven approaches will strengthen America's competitive edge in AI while ensuring these technologies benefit all communities.

II. Economic and Innovation Benefits of Including Multicultural Communities

Artificial Intelligence (AI) is advancing at a blistering pace, transforming industries, and redefining how we live and work. As we shape America’s AI Action Plan, the economic and innovation benefits of multi-perspective development represent a compelling business case for ensuring multicultural communities are central to our national strategy. Including multicultural communities present opportunities for (a) expand market opportunities and innovation, (b) enhanced talent development and competitiveness, and (c) risk mitigation and regulatory efficiency.

a. Expanded Market Opportunities and Innovation

The business case for intentionally incorporating multicultural communities in AI development goes far beyond altruism – it directly impacts the bottom line. When AI systems are developed with diverse perspectives, they unlock markets that might otherwise remain underserved or overlooked entirely. As Sam Altman noted, “AI is a rare example of an extremely hyped thing

that almost everyone still underestimates the impact of."[2] But to fully realize this impact, our AI systems must work for everyone.

History has repeatedly shown that diverse teams identify problems and solutions that homogeneous groups miss.[3] This isn't abstract theory – it's market reality. When facial recognition systems initially failed to properly identify darker-skinned faces, it wasn't just a technical failure but a massive market limitation. Companies that addressed these issues unlocked additional customer segments worth billions.

Multicultural perspectives drive innovation by challenging assumptions and bringing fresh viewpoints that lead to more robust products. Looking at examples from the development of ChatGPT and other generative AI models, systems trained on more diverse datasets demonstrate measurably superior performance across varied user demographics. This creates not just better individual products but entirely new market categories.

b. Talent Development and Competitiveness

America faces a critical AI talent shortage that threatens our global leadership position. As AI employment continues to grow exponentially, with research suggesting that roughly 60% of today's workers are in occupations that didn't exist in 1940,[4] we cannot afford to tap only a fraction of our potential talent pool.

Building educational and professional pipelines in multicultural communities creates a sustainable competitive advantage that directly addresses America's AI talent shortage. When we invest in talent development across all communities, we uncover exceptional minds that would otherwise remain untapped. Companies building AI systems cannot afford to overlook diverse talent pools if they hope to maintain market leadership. The existing networks of historically Black colleges and universities (HBCUs), community colleges, and grassroots technology training programs in multicultural communities provide ready-made infrastructure that can be leveraged to rapidly scale AI education. Companies that establish early partnerships with these institutions gain preferential access to diverse talent pools, while multicultural communities gain pathways to high-growth careers. This symbiotic relationship strengthens both

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[2] Sam Altman (@sama), X (Aug. 15, 2022, 3:39 PM), https://x.com/sama/status/1559274395113177088.

[3] Larry Hardesty, Study finds gender and skin-type bias in commercial artificial-intelligence systems, MIT NEWS (Feb. 11, 2018), https://news.mit.edu/2018/study-finds-gender-skin-type-bias-artificial-intelligence-systems-0212; Fawzy A, Wu TD, Wang K, et al. Racial and ethnic discrepancy in pulse oximetry and delayed identification of treatment eligibility among patients with COVID-19. JAMA Intern Med. 2022;182(7):730-738. doi: 10.1001/jamainternmed.2022.1906; A. Koenecke, A. Nam, E. Lake, J. Nudell, M. Quartey, Z. Mengesha, C. Toups, J.R. Rickford, D. Jurafsky, & S. Goel, Racial disparities in automated speech recognition, Proc. Natl. Acad. Sci. U.S.A. 117 (14) 7684-7689, https://doi.org/10.1073/pnas.1915768117 (2020).

[4] Peter Dizikes, Most work is new work, long-term study of U.S. census data shows, MIT NEWS (Apr. 1, 2024), https://news.mit.edu/2024/most-work-is-new-work-us-census-data-shows-0401#:~:text=%E2%80%9CWe%20estimate%20that%20about%20six,was%20doing%20at%20that%20point.

industry innovation and community economic development, creating a self-reinforcing cycle that enhances American competitiveness in the global AI race.

International competition for AI leadership is intensifying daily. Nations that leverage their full demographic diversity will outpace those that don't. By investing in AI education across all communities, we ensure America maintains its leadership position not just for the next product cycle, but for generations to come.

c. Risk Mitigation and Regulatory Efficiency

Universal involvement in AI development is not just good ethics – it's good business. AI systems developed without diverse input inevitably meet costly failures in the marketplace. These failures aren't merely theoretical – they represent real financial and reputational damage that companies must subsequently address at much greater expense.

Documented algorithmic failures in real-world situations underscore the business costs of homogonous development practices. When Nijeer Parks was wrongfully arrested after facial recognition software misidentified him as a suspect in a hotel shoplifting case – spending 10 days in jail before charges were dropped – it wasn't just a civil rights failure.[5] It represented massive inefficiency and wasted resources in our justice system, with taxpayers bearing the cost of improper detention, court proceedings, and potential settlement payments. These failures multiply across sectors: algorithms directing healthcare resources away from Black patients create economic inefficiencies through increased emergency care costs and lost productivity[6]; mortgage[7] and rental application systems[8] that disadvantage minority applicants shrink potential markets and reduce economic activity. Each algorithmic failure carries compounding costs – legal liability, brand damage, regulatory scrutiny, and market limitations – that far exceed the investment required for incorporating diverse communities in AI development practices upfront.

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[5] John General & Jon Sarlin, *He was innocent. But a facial recognition 'match' got this Black man arrested*, CNN BUSINESS (Apr. 29, 2021, 12:23 PM EDT), https://www.cnn.com/2021/04/29/tech/nijeer-parks-facial-recognition-police-arrest/index.html.

[6] *Racial Bias in Health Care Artificial Intelligence*, NIHCM FOUNDATION (Sept. 30, 2021), https://nihcm.org/publications/artificial-intelligences-racial-bias-in-health-care.

[7] Emmanuel Martinez & Lauren Kirchner, The secret bias hidden in mortgage-approval algorithms, AP NEWS (Published 6:03 PM EDT, August 25, 2021), https://apnews.com/article/lifestyle-technology-business-race-and-ethnicity-racial-injustice-b920d945a6a13db1e1aee44d91475205.

[8] Lauren Kirchner, Can Algorithms Violate Fair Housing Laws?, THE MARKUP (Sept. 24, 2020, 08:00 ET), https://themarkup.org/locked-out/2020/09/24/fair-housing-laws-algorithms-tenant-screenings.

III. Harms of Excluding and Multicultural Communities

Failure to incorporate multicultural perspectives in America's AI development roadmap isn't just a missed opportunity – it creates significant structural vulnerabilities that threaten our economic competitiveness and national security. As we craft our AI Action Plan, understanding these potential harms helps clarify why multi-perspective development is not optional but essential.

a. Economic Costs and Market Failures

When AI systems fail to account for multicultural users and contexts, they leave significant value on the table while creating costly corrections later in the development cycle. The economic impact of narrow AI development approaches is routinely underestimated by organizations rushing to market without considering diverse use cases. This shortsightedness becomes even more consequential when we quantify the direct and indirect costs of exclusion – from expensive retrofitting and market limitations to brand damage and litigation expenses that could have been avoided through multi-perspective design practices from the start.

AI technologies developed with limited demographic inputs inevitably encounter market failures when deployed across diverse populations. The healthcare algorithms that mistakenly direct fewer resources to Black patients with identical medical needs don't just reflect bias – they represent market inefficiency. These systems require expensive retrofitting, often after causing measurable economic harm through misallocation of resources.

The global marketplace is increasingly diverse. American AI companies that develop products optimized for limited demographic segments will find themselves outmaneuvered by international competitors who build more multi-perspective systems from the ground up.

b. National Security and Strategic Disadvantages

America's technological leadership isn't just an economic consideration – it's fundamental to our national security. AI systems built without multicultural perspectives create exploitable vulnerabilities that adversaries can leverage against us.

Narrow demographic representation in AI training and testing creates blind spots that can be weaponized. When facial recognition systems perform inconsistently across different skin tones, or when natural language processing fails with certain dialects or speech patterns, these aren't merely technical limitations – they're potential security gaps. As Dr. Martin Luther King Jr. reminded us, "Injustice anywhere is a threat to justice everywhere." In the AI context, bias anywhere creates vulnerability everywhere.

The global competition for AI supremacy is intensifying. Countries investing in multi-perspective AI development gain strategic advantages by creating more robust, generalizable

systems. When we exclude multicultural communities from our AI development ecosystem, we cede potential advantages to international competitors who recognize the strategic value of diversity in building more capable systems.

IV. Actionable Recommendations

To secure America's AI leadership while ensuring these technologies benefit all communities, we recommend concrete actions that leverage our nation's full innovative potential. These recommendations focus on practical, market-driven approaches that reduce unnecessary regulatory burdens while maximizing economic opportunity and technological advantage. Our roadmap consists of three strategic pillars: (a) establishing Public-Private Partnerships for multi-perspective AI that create economic incentives for diverse development; (b) expanding Education and Workforce Development initiatives that build talent pipelines in multicultural communities; and (c) implementing balanced Regulatory Frameworks and Standards that provide clarity without constraining innovation.

a. Public-Private Partnerships for Multi-perspective AI

America's competitive edge in AI requires collaborative approaches that unite government resources with private sector innovation. We recommend establishing structured partnerships specifically designed to accelerate multi-perspective AI development.

The creation of AI Innovation Zones in multicultural communities would provide tax incentives for companies establishing research and development facilities in underserved areas. Like Opportunity Zones[9], these designations would encourage investment while building technology corridors that create sustainable economic growth. The investments we make in people today will allow the US to lead the AI race going into the next generation. These innovation zones plant the seeds for America's future AI leadership.

We recommend establishing shared testing environments through the National Institute of Standards and Technology (NIST) where companies can evaluate AI systems across diverse populations before deployment. This resource would reduce duplicate efforts across the industry while establishing clear benchmarks for system performance. These environments should include standardized tools for bias detection and mitigation that companies of all sizes can access.

Industry-led data trusts with community oversight would expand the availability of diverse training data while maintaining privacy and sovereignty. By creating frameworks for responsible data sharing, we can accelerate the development of more robust AI systems while respecting community ownership of cultural information. Properly implemented, these trusts would

[9] Pub. L. No. 115-97, § 13823, 131 Stat. 2054, 2183 (2017).

function as a form of community wealth-building that recognizes the value of diverse data contributions.

b. Education and Workforce Development

Building America's AI workforce requires strategic investments in education and training across all communities. As Dr. Martin Luther King Jr. said, "The function of education is to teach one to think intensively and to think critically." Nowhere is this more important than in AI development.

We recommend establishing AI Centers of Excellence at HBCUs and Minority-Serving Institutions (MSIs) through strategic public-private partnerships. These centers would combine academic research with practical industry applications, creating pipelines from education to employment while advancing the state of AI science. This approach recognizes the untapped talent in these institutions and provides the resources to develop it.

Apprenticeship programs that connect diverse talent directly to AI development roles should be expanded through industry collaborations with community colleges and technical schools. These "earn while you learn" models provide immediate economic benefits to participants while addressing critical workforce needs. These apprenticeships build both individual skills and collaborative capabilities.

K-12 AI literacy initiatives should be expanded in underserved school districts, with special emphasis on early exposure to computational thinking and AI concepts. These programs should include teacher training components that build local capacity for ongoing education. Early exposure creates pathways to AI careers while developing critical thinking skills valuable across disciplines.

c. Regulatory Framework and Standards

Effective governance requires balanced approaches that promote innovation while addressing legitimate concerns. We recommend developing frameworks that provide clarity without imposing unnecessary constraints.

Industry-led standards development with multicultural stakeholder participation would create practical guidelines for multi-perspective AI. These voluntary standards should include metrics for measuring system performance across diverse populations, with certification processes that provide market recognition for compliant products. Unlike rigid regulations, these standards can evolve rapidly alongside technological developments.

Safe harbor provisions for companies following multi-perspective development practices would provide regulatory certainty while encouraging best practices. These provisions would recognize good-faith efforts to implement multi-perspective design while maintaining appropriate accountability for outcomes. This balanced approach promotes innovation while establishing clear expectations.

Independent assessment methodologies developed through multi-stakeholder processes would provide transparent evaluation of AI systems' performance across diverse populations. These assessments would help consumers make informed choices while providing developers with valuable feedback for improvement. By establishing clear metrics for multi-perspective performance, these methodologies would drive market-based improvements without prescriptive regulations.

As the MMTC has consistently advocated, these approaches recognize that prioritizing inclusivity in AI development is not just a moral imperative but a strategic advantage. Implementing these recommendations would help America secure its AI leadership position while ensuring these powerful technologies benefit all communities.

The path forward requires sustained commitment from both government and industry. By adopting these actionable recommendations, the AI Action Plan can establish America's enduring leadership in artificial intelligence while fulfilling our nation's promise of opportunity for all.

V. Conclusion

America stands at a pivotal moment in the AI revolution. The choices we make now will determine not only our global competitiveness but also how equitably the benefits of these powerful technologies are distributed across our diverse society.

The recommendations we've outlined provide a practical roadmap for advancing American AI leadership while ensuring all communities participate in and benefit from this technological transformation. By establishing targeted public-private partnerships, building multi-perspective talent pipelines, and implementing balanced governance frameworks, we can create AI systems that leverage our nation's full innovative potential.

The business case is clear: multi-perspective AI development isn't just the right thing to do – it's the smart thing to do. Companies that develop AI with diverse input create more robust, marketable products while avoiding costly retrofits and regulatory complications. Nations that leverage their full demographic diversity in AI development gain decisive advantages in global competition.

As MMTC has demonstrated through decades of advocacy in technology policy, America thrives when we embrace our diversity as a strategic asset. By incorporating these recommendations into the AI Action Plan, we can position the United States for enduring leadership in artificial intelligence while fulfilling our fundamental promise of opportunity for all Americans.