

October 27, 2025

Michael Kratsios, Director  
Office of Science and Technology Policy  
1650 Pennsylvania Avenue NW  
Washington, DC 20502

**Re: Request for Information—Regulatory Reform on Artificial Intelligence**  
**Docket ID: OSTP–TECH–2025–0017**

Mr. Kratsios:

STM, the International Association of Scientific, Technical, and Medical Publishers, appreciates the opportunity to provide input to OSTP’s Request for Information (RFI) on regulatory reform pertaining to artificial intelligence ([OSTP-TECH-2025-0017](#)).

Our 160 members—comprising learned societies, university presses, and commercial publishers—collectively publish more than two-thirds of the world’s peer-reviewed scientific literature. STM members work at the intersection of innovation and information integrity, serving as both creators and custodians of the high-quality content that underpins reliable artificial intelligence systems. Our role makes STM uniquely positioned to contribute insights on how federal regulatory approaches can foster trustworthy and innovative AI ecosystems.

Importantly, STM’s members are not only providers of high-quality scientific content used to train AI systems but are also active users and developers of generative AI technologies, deploying these tools to accelerate research and innovation for the benefit of American society. This dual role underscores our deep commitment to ethical, transparent, and effective AI adoption across the research and publishing landscape. STM has articulated these values in [our AI portal](#), as well as in reports on the appropriate use of AI in research: [AI Ethics in Scholarly Communication](#), released April 2021; [Generative AI in Scholarly Communications: Ethical and Practical Guidelines for the Use of Generative AI in the Publication Process](#), released in December 2023; and [Recommendations for a Classification of AI Use in Academic Manuscript Preparation](#), released this year.

We applaud OSTP for recognizing in the *AI Action Plan* the need for concerted government action and support to ensure continued AI innovation and public adoption of these technologies. Central to these is ensuring that AI is trustworthy and reliable. While some regulation may be unnecessary in some specific areas, we share OSTP’s view that “the realization of the benefits [of AI] require policy frameworks.” Removing the policy frameworks that support quality, trust, and innovation would—counter to the Administration’s goals—create real roadblocks to American AI innovation, remove incentives for human creation, innovation, and discovery, and reduce both the quality and utility of AI. STM agrees that regulatory reform should focus not on deregulation for its own sake, but on reinforcing the foundations that enable safe, trustworthy, and innovation-driven AI—most notably, intellectual property protection and transparency in the provenance of data and algorithms.

The goal articulated in “[America’s AI Action Plan](#)” to achieve global dominance in AI requires a long-term view: the AI race is a marathon, not a sprint. It may be tempting to relax safeguards so AI models and systems can ingest more content without any regulation to achieve short-term gains, but long-run value creation in AI depends on preserving incentives for human creativity and maintaining the supply of high-quality, vetted inputs that models need to remain accurate and reliable over time. STM’s reports state this clearly, and the same message is sent by the government’s own reports and planning. For example, the [NIST AI Risk Management Framework \(AI RMF\)](#) emphasizes that data quality and provenance are core to trustworthy AI, underscoring that the integrity and traceability of training data are not optional features but prerequisites for durable performance and public confidence. Emerging evidence on “model collapse” shows that recursive training on synthetic content degrades model capabilities—especially on rare and critical edge cases—illustrating how eroding the pool of high-quality human-authored material can impair future AI systems and downstream applications. Weakening regulatory guardrails regarding IP protection and transparency would therefore jeopardize the very content engine that sustains AI’s long-term utility, with adverse consequences for U.S. competitiveness, innovation capacity, and jobs.

### **Intellectual Property Protection: The Foundation of Responsible and Reliable AI**

Robust intellectual property protection constitutes the foundation upon which responsible AI innovation must be built. Far from constituting regulatory barriers, federal copyright and licensing frameworks provide the legal certainty and economic incentives necessary to maintain the high quality, accuracy, and provenance of the content used to train AI systems. These protections ensure the continued availability of reliable human-generated content as inputs to AI, thereby preserving the integrity of downstream AI-generated outputs. The President’s Executive Order on [Removing Barriers to American Leadership in AI](#) rightly emphasizes the need to promote human flourishing, which cannot continue if synthetic materials overwhelm and undermine the use of human-created content in AI.

The scholarly publishing ecosystem heavily invests in quality control processes—including research integrity checks, peer review, rigorous metadata standards, and correction mechanisms—that enhance reliability and reproducibility. These systems rely on and are buttressed by IP protections that reward creators, support reinvestment in content curation, and support the implementation of linking and tagging that enable discovery and downstream use. These investments are only possible when IP laws guarantee creators and investors a fair return and a clear legal basis for licensing content to AI developers.

The licensing market for data and content used in machine learning is already thriving under existing copyright and contract law frameworks. These allow willing parties to negotiate terms that ensure legal use, accurate outputs, proper attribution, and compensation for creators. Far from slowing innovation, licensing enhances accountability by establishing a transparent record of what material is used to train AI systems. A national policy that affirms IP protection as essential to AI development will accelerate—not impede—growth and competitiveness.

STM urges OSTP to explicitly reaffirm that intellectual property protections are not impediments to innovation but indispensable instruments advancing U.S. leadership in AI. Federal initiatives encouraging

or mandating model training with properly licensed content will provide critical clarity and preserve investment incentives channeling innovation toward high-quality, legally compliant AI systems. Coordination with agencies charged with IP stewardship—including the United States Patent and Trademark Office and the Department of Commerce—will be essential to developing clear, harmonized guidance distinguishing permissible research use from commercial exploitation of protected works.

### **Transparency and Provenance: Enabling Accountability and Confidence**

Transparency forms the indispensable counterpart to IP protection in securing public trust in AI. The provenance of data—its origins, licensing conditions, and usage contexts—must be clearly documented to ensure accountability throughout AI’s lifecycle and to enable users to trust AI-driven decisions and outputs. As with IP protections, transparency and accountability frameworks are indispensable to accelerating the use and quality of AI tools, and frameworks supporting the same must be reinforced.

Without comprehensive provenance disclosures, AI systems risk perpetuating misinformation or infringing on rights, undermining both public confidence and legal compliance. Federal policies that emphasize provenance standards consistent with established publishing practices will bolster AI reliability and help prevent misuse. This is particularly important as AI applications expand into health, education, and policy domains where the consequences of errors or opacity can be severe.

STM and its members have already seen and are working to address the importance of such frameworks in the research enterprise. The scientific publishing community offers effective models for provenance and transparency, having institutionalized practices such as persistent identifiers, version control, and correction tracking that enable transparent citation and traceability of research outputs.

STM supports the development of harmonized federal provenance standards that require comprehensive metadata, clear source attribution, and consistent mechanisms for updating or correcting training data and model outputs. Such standards could build on foundational work like the National Institute of Standards and Technology’s Risk Management Framework, adapted to the complexities of AI data ecosystems. Moreover, incorporating provenance and transparency requirements into federal funding and contract provisions will promote broader adoption of robust accountability practices.

### **Frameworks for Scientific Innovation and American Leadership**

The policy frameworks that underpin intellectual property protection and transparency are not abstract regulatory concepts; they are vital engines powering scientific innovation and economic growth in the United States. Scientific discovery—rooted in reliable, high-quality research—is foundational to advances in health, technology, energy, and numerous sectors critical to national competitiveness and public welfare. The US research ecosystem, supported by a dynamic scholarly publishing enterprise, fuels innovations that contribute trillions of dollars annually to the American economy, sustain hundreds of thousands of jobs, and generate global impacts beneficial to society at large.

By ensuring that creators and innovators retain clear rights and appropriate incentives, IP protections maintain the creativity engine that has enabled American leadership for decades. These protections

foster reinvestment in rigorous peer review, editorial stewardship, and technological infrastructure that produce the high-quality content necessary to train, validate, and improve AI tools. At the same time, transparency and provenance frameworks enable the reproducibility and accountability essential for scientific progress and public confidence in research and AI tools alike.

Without these interlocking policy protections, the flow of reliable knowledge would weaken, slowing innovation and diminishing the competitiveness of US researchers and industries. Furthermore, the market for licensed, high-quality data that sustains AI development today could erode as synthetic, unvetted materials proliferate, increasing misinformation risks and reducing the trustworthiness and value of AI outcomes. Sound policy frameworks thus preserve not only creative incentives but the very quality and utility of AI as a revolutionary technology.

STM's members—by maintaining and enhancing the scholarly communication ecosystem—play an integral role in this virtuous cycle of creation, dissemination, and innovation. In partnership with federal agencies, policymakers must ensure that regulatory reforms protect these essential frameworks, recognizing their centrality to sustaining U.S. economic growth, innovation leadership, and the public's access to trustworthy knowledge.

### **Modernizing Regulatory Frameworks to Support Innovation and Integrity**

While recognizing the necessity of IP and transparency safeguards, STM acknowledges the scope for reform to eliminate ambiguities and redundancies in the federal regulatory landscape. Some agency rules remain overly vague or inconsistent about AI's permissible role in research workflows, creating uncertainty and potentially deterring beneficial adoption. Clarification via updated guidance that explicitly endorses responsible AI-assisted peer review, data curation, and fraud detection could accelerate progress without compromising rigor.

OSTP's regulatory reform agenda should prioritize enhanced interagency coordination to align standards on provenance, licensing, and acceptable AI practices. This harmonization effort would alleviate administrative burdens, foster interoperability, and provide clear guidance for creators, AI developers, and researchers alike. STM's own Integrity Hub initiative, where AI tools proactively identify potential scientific research errors, offers a replicable example of how the private sector is responsibly deploying AI within existing legal frameworks to promote research integrity.

Regulatory modernization should also address overlapping or conflicting agency rules—such as those relating to privacy, export controls, and competitive practices—that unintentionally limit responsible data sharing or model development while maintaining critical protections. A balanced approach that safeguards rights while promoting innovation will best serve the Administration's goals and the public interest.

### **Call for Partnership**

STM supports OSTP's vision of regulatory frameworks that enable innovation while preserving the transparency, accountability, and IP protections fundamental to trustworthy AI. We urge OSTP to build upon existing, proven mechanisms that have long governed scientific knowledge to ensure that AI's

wide-ranging potential is realized in ways consistent with American values and leadership ambitions. We also support the aligned positions expressed in submissions from the Copyright Alliance and the Association of American Publishers.

STM remains committed to contributing our expertise and convening capabilities to establish policies that reinforce innovation and public trust alike. We look forward to supporting OSTP in advancing regulatory reforms consistent with the need for robust copyright, licensing, and transparency in AI development for the benefit of America.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read 'Caroline Sutton', with a long, sweeping horizontal stroke extending to the right.

Dr. Caroline Sutton  
Chief Executive Officer  
STM