



Mozilla's Response to the Office of Science and Technology Policy Request for Information on the Development of an Artificial Intelligence (AI) Action Plan

About moz://a

Mozilla's mission is to ensure the internet is a global public resource, open and accessible to all. An internet that truly puts people first, where individuals can shape their own experience and are empowered, safe, and independent.

Founded as a community open source project in 1998, Mozilla consists of several organizations. Most notable is the non-profit Mozilla Foundation and its wholly owned subsidiary, the Mozilla Corporation, which leads our market-based work, including the development of the open-source Firefox web browser and Gecko, one of only three major browser engines. They work in close concert with each other and a global community of tens of thousands of volunteers under the single banner: Mozilla.

For the past five years, Mozilla has been committed to advancing trustworthy AI. Mozilla published a paper in early 2024, Accelerating Progress Toward Trustworthy AI, that outlines how Mozilla and its allies are advancing openness, competition, and accountability in AI. Mozilla is putting its resources behind these priorities as well: Mozilla is investing \$30M in research and development on trustworthy AI via Mozilla.ai, as well as \$35M in responsible tech startups — including investments in notable startups like Hugging Face — through Mozilla Ventures and the Mozilla Builders accelerator program. On the frontlines of modern AI practices, Mozilla freely provides an open-source, large-language model (LLM) AI model deployment system for local use and empowers more people to enhance the safety of models online through the ODin bug bounty program. In addition, Mozilla supports organizations engaged in artificial intelligence research, including the Open Source Initiative's work on defining Open Source AI, and through the efforts of the Columbia Convening which brought together a broad set of stakeholders to talk about Openness and AI.

As an independent and mission-driven organization, Mozilla is committed to working with regulators to develop effective policies that ensure that innovation and growth in AI serve the public interest. In the past, Mozilla has provided comments on critical topics like the Department of Energy’s RFI on the Frontiers in AI for Science, Security, and Technology (FASST), NTIA’s consultation on openness in AI models, and NIST’s Request for Comments related to Managing Misuse Risk for Dual-Use Foundation Models.

Executive Summary

For the future of AI to benefit all Americans, we must ensure that its benefits are shared widely while working to mitigate evidence-based risks.

The modern web was founded on the ideal of openness and built on an architecture that enabled broad access and participation. However, the open architecture that defined the outset of the web has been eroded, with the internet increasingly dominated by a few big platforms and proprietary systems and technologies. At the dawn of the AI age, these same dominant tech companies are positioned to hegemonize the next phase of the internet by controlling major AI systems. In order to have a dynamic internet economy and AI ecosystem that offers real accountability and choice, the principles of the modern web – focused on openness, access, and participation – must be protected. The AI era cannot be dominated by big tech companies, which could both threaten the pace of innovation and run roughshod over individual rights, like privacy. Mozilla has long been a proponent of strong federal privacy legislation, and creating clear guidelines and certainty for consumers and businesses related to privacy will be critical to enabling the growth of the AI industry.

Well-designed regulation is needed to make AI more trustworthy and to mitigate risk. AI policy should center on openness, competition, and accountability as the backbone of responsible regulation. Leadership in AI requires investments in the tools and resources necessary to build Public AI infrastructure. Well managed government-led or facilitated investment into Public AI, including investment into fundamental research and AI infrastructure like the National AI Research Resource (NAIRR), can also help to facilitate a more level playing field, and create choice for consumers and small businesses.

Promoting open approaches in AI has the potential not just to create technology that benefits individuals, but also to make AI systems safer and more transparent. Open approaches and public investment can spur increased research and development, create

products that are more affordable, safer, and less vulnerable to cyberattacks, and help to catalyze investment and job creation.

To meet America's goals of leading in AI, policymakers should avoid heavy-handed levers like export controls on open-source AI models. Instead, the new administration should build on the recommendations of NTIA and the Bipartisan House Task Force Report on AI to support the open-source AI ecosystem while continuing to collect information for future data-driven assessments. The enactment of broad export controls on open-source AI models would stymie innovation and hurt the ability of the U.S. to remain competitive in the global AI market.

Policy Recommendations to Advance American AI

Increase Government Use of, and Support for, Open-Source AI: The federal government procures billions of dollars of software every year. However, much of it is closed-source, proprietary, and expensive. If the administration eases the ability to procure and use open-source software (ex. via OPM rulemaking) across agencies, it could result in significant time and cost savings for government IT projects. As federal agencies increasingly procure AI-enabled technology, using open-source AI models and software will help to increase government efficiency while strengthening the open-source ecosystem. Such an approach facilitates the development of a more competitive AI ecosystem, unlocking AI for everyone.

The federal government should also continue to implement policies on government use of AI that were signed by President Trump in his first term in office. That includes continuing to implement Executive Order 13960 and the AI in Government Act of 2020, the latter which led to OMB Management Memorandum M-24-10 that has key provisions on testing AI systems that are vital for trustworthy AI. Continued transparency via the annual AI use case inventories, initiated by the first Trump Administration, is vital for decreasing duplication and increasing coordination in AI across the federal government.

Develop & Fund Public AI Infrastructure: Public AI infrastructure takes a range of forms, but one concrete proposal is the National AI Research Resource (NAIRR). By supporting the creation and funding of the NAIRR, Congress and the administration could kickstart the development of Public AI, giving researchers and smaller universities access to AI tools and compute resources, enabling innovation and a more level playing field. In addition,

supporting projects like the Department of Energy's proposed Frontiers in Artificial Intelligence for Science, Security and Technology (FASST) initiative will be critical in not only pushing the scientific frontier forward, but in creating Public AI infrastructure that benefits the American people.

Update Antitrust Legislation: No company should be punished for their success or building products that people prefer. However, policymakers must address anti-competitive business practices that impede innovation and limit consumer choice. In order to effectively tackle the root causes of anti-competitive behavior in the tech industry, Congress must pass antitrust legislation which addresses harmful self-preferencing practices and provides necessary resources, expertise, and authorities to relevant regulatory agencies. Without appropriate competition enforcement, the AI industry is likely to be eventually held back as dominant players use monopoly power — for example by leveraging powerful market positions in other verticals — instead of innovation to maintain their leadership.

Foster Competition Across the Browser, Browser Engine, and AI Ecosystem: Independent browser and browser engine developers, like Mozilla, have a long history of innovating and using their technologies to promote competition. In AI, like in the browser market, fostering open source alternatives can help drive interoperability, innovation and competition. This is especially critical given the emergence of AI agents which could herald a new model for how the web is used, but still depend on browser engines to effectively function. Without effective competition across the tech stack, the emerging field of AI could be stymied for a host of different and difficult to predict reasons. Any federal action with the potential to reduce competition should take into account unintended downstream consequences on America's overall security and innovation ecosystem.

Provide Access to AI-Related Resource Consumption Data: At its current growth trajectory, AI could end up consuming tremendous amounts of energy and natural resources in the near future. In order to more effectively understand the needs of the industry and work to bring more clean energy online the government should work with the AI industry (from semiconductor developers to cloud providers to model deployers) to provide open access to resource consumption data and increase industry transparency. This would help to stabilize grids and potentially lead to lower prices for consumers by driving efficiency in

AI training and use. By collecting adequate data on AI resource demands, industry can better prepare and invest in new energy and related infrastructure, helping to expedite the rollout of new infrastructure and keeping America at the bleeding edge of AI development.

Clarify the Federal Position on Open-Source AI Export Controls: In their July 2024 report related to the use of open models, NTIA emphasized that based on the data available today, the government should take no current action to restrict open foundation models. However, discussions linger over the use of export controls to limit the dissemination of open AI models. This creates uncertainty for the open-source community, technical researchers driving progress in AI, and the many startups that leverage such software to bring products to market cheaper and faster than large tech companies. By affirming a federal position on open-source AI export controls to reflect those of NTIA, and emphasizing the benefits of open models, the administration can spur further advancement in the field. This will in turn help advance national objectives as American open-source powered AI exports spread around the world. It may also prevent vendor lock-in for AI deployers and drive supplier diversity, including in the national security context. This is a view echoed broadly by industry decision makers: in the February 2025 McKinsey report, which was created as part of a research collaboration with the Mozilla Foundation and the Patrick J. McGovern Foundation, "Open source in the age of AI," "60 percent of decision makers reported lower implementation costs with open source AI compared with similar proprietary tools." The report went on to say that "Overall, 76 percent of respondents expected their organization to increase use of open source AI technologies over the next several years. This may be in part because open source has been part of a vibrant software ecosystem in many categories of enterprise software, as well as a foundational resource for developer communities, for decades."

Growing the AI Talent Ecosystem: Without leading experts and practitioners in AI, America will face grave difficulties competing with larger countries and coalitions which may have a numerical advantage in the number of researchers and computer scientists they produce. America must invest in community colleges, rural and public universities, apprenticeship and retraining programs, and beyond to develop and grow the domestic AI talent ecosystem. This will not only help America compete, but provide pathways to good jobs and advance the goal of creating AI that will not replace humans as elucidated by Vice President Vance at the 2025 Paris AI Action Summit. The administration should look to examples of innovative partnerships between the public and private sector that create

unique education pathways and a pipeline of qualified workers like Dakota State University's partnership with ArmyCyber.

Conclusion

Ensuring that AI development remains open, competitive, and accountable is crucial for fostering innovation and safeguarding public interests. As an organization that both builds AI products and advocates for policies that promote trustworthy AI, we believe that it is critical to create policies that emphasize government support for open-source AI, investment in public AI infrastructure, and the establishment of clear regulatory frameworks that enhance transparency while preventing monopolistic control. By taking a leadership role in global AI standards, supporting AI talent development, and addressing energy consumption concerns, the U.S. can create a competitive and innovative AI ecosystem. We look forward to working with you and appreciate the willingness to consult with the broader public on the administration's developing strategy on AI.

Mozilla

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