January 14, 2026

Re: Request for Information on Partnerships for Transformational Artificial Intelligence Models RFI No. DE-ASCR-26-0001

ACT | The App Association (ACT) appreciates the opportunity to respond to the Department of Energy's Request for Information on Partnerships for Transformational Artificial Intelligence Models. ACT represents small and medium-sized software developers and technology firms that are building and deploying AI-enabled solutions across scientific, industrial, and commercial domains.

ACT strongly supports DOE's vision to mobilize the National Laboratory complex, academia, and the private sector to advance AI-enabled scientific discovery, strengthen U.S. competitiveness, and support national security objectives. This initiative presents an important opportunity to ensure that America's AI leadership is driven not only by scale, but by broad participation, flexibility, and innovation across the full ecosystem, including small businesses.

I. Statement of Interest

ACT is a global policy trade association for the small business technology developer community. Our members are entrepreneurs, innovators, and independent developers within the global app ecosystem that engage with verticals across every industry. We work with and for our members to promote a policy environment that rewards and inspires innovation while providing resources that help them raise capital, create jobs, and continue to build incredible technology. The small businesses and startups we represent both participate and seek to participate in the international standard-setting process to contribute and build on important technical standards. ACT members are active in new platforms, like Web3, develop using indispensable technologies (i.e., artificial intelligence), and innovate on top of technical standards. The value of the domestic ecosystem ACT represents, which we call the app economy, is approximately $1.8 trillion and is responsible for 6.1 million American jobs, while serving as a key driver of the $8 trillion internet of things (IoT) revolution.[1] As lead innovators in critical and emerging technologies (CET), small businesses must be a part of this conversation.

II. ACT Comments

Supporting a Flexible, Inclusive Public-Private Consortium

ACT supports DOE's intention to establish a public-private consortium to curate scientific data and enable the development of advanced AI models for science and engineering. To be successful, this consortium should be designed with flexibility and inclusivity as core principles. Small and medium-sized innovators are often the source of novel AI applications and scientific insights, but they face structural barriers to participation in large federal initiatives. DOE should therefore prioritize consortium structures that:

[1] https://actonline.org/wp-content/uploads/Fast-FactS_Website.pdf.

- Lower barriers to entry for small businesses and independent innovators;
- Enable participation across a wide range of organizational sizes and technical capacities;
- Avoid one-size-fits-all requirements that inadvertently favor large incumbents.

A consortium that reflects the range of the U.S. innovation ecosystem stakeholders and communities will be better positioned to deliver long-term value.

Data Access, Governance, and Responsible Use

DOE's scientific data assets are uniquely valuable. ACT supports DOE's efforts to curate and prepare these data for AI use in ways that maximize scientific and economic benefit while respecting legal, privacy, and security constraints. DOE should emphasize:

- Responsible data stewardship, including transparency around provenance, quality, and appropriate use;
- Governance models that support data sharing and reuse without undermining confidentiality, security, or proprietary interests; and
- Approaches that allow innovation to proceed without requiring unnecessary centralization or disclosure of sensitive information.
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Clear and predictable data governance will be essential to encouraging participation by small businesses that lack the resources to navigate complex or uncertain compliance regimes.

Access to AI Models and Infrastructure

ACT strongly supports DOE's intent to make AI models developed through this initiative broadly available to the scientific community through government, academic, and private-sector infrastructure. Access should be designed to:

- Enable researchers and innovators of all sizes to easily experiment, build, and deploy AI-enabled tools;
- Avoid structural advantages for large firms with existing infrastructure or capital; and
- Complement, rather than duplicate, existing federal research access programs.

Broad access is essential to ensuring that public investment in AI yields widespread public benefit.

Intellectual Property and Incentives

Clear and balanced intellectual property (IP) and data rights frameworks are critical to sustaining private-sector participation, particularly for small businesses whose primary assets are their IP and technical expertise. ACT encourages DOE to:

- Ensure that participation does not require the disclosure of proprietary information, trade secrets, or commercially sensitive AI assets; and
- Provide certainty that contributors can continue to innovate and commercialize downstream applications.

Research, Technology, and Economic Security (RTES)

ACT recognizes DOE's responsibility to protect U.S. research, technology, and economic security interests. At the same time, security requirements should be risk-based, transparent, and proportionate, particularly for small and medium-sized firms. DOE should seek to:

- Clearly communicate RTES expectations early in the process;
- Avoid overly broad restrictions that unintentionally exclude U.S.-based small businesses operating in global markets;
- Balance security objectives with the need for agility and innovation.

III. Conclusion

ACT supports DOE's efforts to establish a public-private consortium to advance transformational AI models for science and engineering. By grounding this initiative in principles of flexibility, inclusivity, and small-business participation, DOE can help ensure that this effort accelerates discovery while reinforcing America's AI leadership.

ACT appreciates DOE's consideration of these views and welcomes continued engagement as this initiative moves forward.

Sincerely,

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