



June 30, 2022

The National Science Foundation
2415 Eisenhower Avenue
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NAIRR-responses@nitrd.gov

Re: RFI Response: National AI Research Resource Interim Report

Dear Colleagues:

The University Corporation for Advanced Internet Development (d/b/a “Internet2”) appreciates the work of the Task Force and the opportunity to provide comments.¹ Internet2 is encouraged by the Task Force’s recognition of the important role that existing campus-, regional-, and national-scale resources play in supporting research activities as noted in Recommendation 2-3. As one of these national-scale resources, Internet2 is supportive of the interim report and takes this opportunity to provide additional comments in relation to topic letter b in the RFI relating to the establishment and sustainment of the NAIRR, including agency roles, resource ownership and administration, governance and oversight, resource allocation and sustainment, and performance indicators and metrics.

Recommendation 3-10: Access to NAIRR resources should be contingent on research project proposal review, be governed by clear use policies and user agreements, and be in compliance with relevant requirements for open sharing of research outputs.

The Interim Report recommends that “the NAIRR management entity should aim to implement standard legal agreements for users and resource providers, establishing common terms of use.” Further, the report states, “[s]uch legal agreements have the potential to substantially reduce the administrative burden that researchers and their institutions would otherwise face in establishing agreements with multiple resource providers on a case-by-case basis.”

Internet2 suggests that NAIRR should work to integrate with existing agreements and technical implementations in place at academic institutions and incorporate any specifically negotiated terms for into existing agreements. In many cases, the agreements already in place for cloud services are heavily negotiated to meet a complex set of institutional requirements, state laws and requirements, and federal laws. There also are a number of collaborative agreements for cloud services that are widely adopted across research and education institutions, including those negotiated as part of the Internet2 NET+ program.

During more than a decade of working with research and education institutions on collaborative cloud agreements, Internet2 has observed that the requirement to enter into new agreements for cloud services, in addition to those requirements that universities already maintain, creates procurement and technical overhead that slow speed to adoption and can potentially raise significant administrative, technical, and

¹ Internet2 submitted comments to the National Science Foundation on September 29, 2021, in response to the RFI on the National AI Research Resource. See: <https://www.ai.gov/rfi/2021/86-FR-39081/I2-NAIRR-RFI-2021.pdf>. In addition, Ana Hunsinger, Vice President of Community Engagement, participated in a panel discussion on *User Resources: Portal Interface and Educational Tools*, on October 25, 2021, elaborating on the recommendations offered by Internet2 in the September 2021 comments.



security challenges. Most major research institutions already have at least one, and likely more than one, implementation of public cloud infrastructure services in place. Thirty-two unique higher education institutions responded to the 2021 Cloud Forum Survey.² Of those, six institutions were single-cloud, with single-cloud defined as having no more than one cloud platform at five percent or more usage. The rest had made meaningful investments in two or more cloud platforms.

Internet2 has seen first-hand the challenge of tying a program to a specific contract or reseller and worked collaboratively to resolve that challenge. As an example, Internet2 has worked with institutions to streamline their access to the National Institutes of Health (NIH) STRIDES program in a manner that did not require: (1) agreeing to an additional contract; (2) creating a new business relationship with a channel partner (e.g., reseller); and/or (3) duplicating existing enterprise controls already managed by the institution. Working collaboratively with higher education institutions, the cloud service providers, channel partners, and NIH, Internet2 was able to implement this approach for both Amazon Web Services (AWS) and Google Cloud Platform.³

In a May 2021 letter to NIH, the NET+ AWS Service Advisory Board described the challenges caused by the requirement to enter into a new agreement to leverage STRIDES awards with AWS.⁴ Two excerpts from that letter are included below for the Task Force's consideration:

- (1) Our institutions have invested time and effort to integrate AWS into our technical, security, and business processes, enabling our researchers to efficiently use AWS in ways that integrate with established security policies and billing structures.
- (2) Use of a separate reseller would require deployment and maintenance of an entirely separate set of AWS security, networking, monitoring, and support infrastructure on our campuses, plus review, approval, and maintenance of a second AWS contract. This creates duplicate processes and technologies that rapidly become difficult to maintain, creating very real business and security risks.

In summary, the Task Force's goal of enabling pathways into AI research is best served by integrating into pathways that already exist in the context of cloud agreements. Many higher education institutions already have complex legal agreements and technical environments to enable public cloud resources for their users.

Respectfully submitted,

/s/ John S. Morabito
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² See [2021 Cloud Forum Data Survey Results](#)

³ [Internet2 Announces Availability of Collaborative Agreement With AWS for NIH Award Recipients to Utilize the STRIDES Initiative - Internet2](#); and [Internet2 NET+ Google Cloud Platform Terms of Service Now Available for NIH Award Recipients to Utilize the STRIDES Initiative - Internet2](#)

⁴ [AWS NET+ Service Advisory Board - NIH Request](#); and [NET+ Amazon Web Services \(AWS\)](#)