

## Submission of Ad Hoc Group of Developers & Users of Generative AI<sup>1</sup>

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We are writing to you as a group of companies, entrepreneurs, software developers, and scientific researchers who contribute to, depend on, or benefit from generative AI tools.

The Copyright Office's August 30 Notice of Inquiry on copyright and AI calls attention to questions about what generative AI "systems may mean for the future of creative industries." Although some of the most prominent uses of generative AI involve the creation of new works of art and entertainment, it is important to recognize that its utility is far broader. This technology is also proving to be transformative for a wide range of activities across other sectors of the economy. We're writing to call attention to the breadth of uses this technology can be put to, and to urge the Copyright Office not to jeopardize the ability of AI researchers and innovators to continue training AI systems on publicly available content.

**In order to support that wider ecosystem of innovation and scientific research, copyright policy must continue to allow the training of AI tools on existing works.**

Generative AI's development and ongoing improvement depends on the ability to train on a wide variety and breadth of data. Rather than simply replicating the data, generative AI models are built by analyzing information in order to derive relationships, patterns, and concepts. Increasingly, people are building on top of "foundation models," which are trained on billions of pieces of data and can be adapted to a wide range of tasks. While providing responses to user inputs in order to generate art or other creative works is one of the more high-profile uses, there are many other uses including sentiment analysis, object recognition and labeling, interactive chatbots, complex pattern detection and correlation, and much more.

Access to data has enabled higher quality AI systems, and that is now unlocking opportunities across the economy. Like transformative technologies that came before, generative AI challenges our expectation of the way things should be done. For instance:

- **Enterprise & Business Productivity:** Generative AI has the potential to unlock productivity gains across the economy, [adding trillions of dollars of economic value](#). For instance, it can help with summarizing and organizing complex information, producing content for advertising and marketing, and enabling rapid resolution of customer questions and issues in the support and sales contexts. In particular, micro-, small-, and medium-sized enterprises stand to gain significantly from generative AI.
- **Software development:** Generative AI is also being adapted to a range of specific professions and industries. For instance, software engineers are benefiting from generative AI tools that identify and correct errors in code, and are capable of analyzing the root causes of vulnerabilities.

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<sup>1</sup> Signatories listed at the end; submission filed by [Proteus Strategies](#) on their behalf

- **Education:** Schools, teachers, and other educational organizations are using generative AI to craft lesson plans, accelerate development of learning content, and provide personalized assistance to students.
- **Law:** Businesses are already deploying tools that help with both research tasks as well as generation of contracts and other legal documents.
- **Finance:** Generative AI can help automatically generate financial reports, analyze and summarize market trends, and provide other insights from financial data.
- **Healthcare:** Generative AI models have already been fine-tuned to develop medically-knowledgeable chatbots, aid radiological diagnostics, and assist therapists in diagnosing and triaging mental health disorders.
- **Climate science:** Companies are building generative AI tools to help streamline purchases of clean energy, assess the environmental impact of products and services, and support other scientific research to address climate change.
- **Research and Development:** Companies are using generative AI tools to optimize everything from pharmaceutical development to consumer product design.
- ...and much more

Today, all of these uses and more are made possible due to the fact that copyright strikes a careful balance. In order to support creativity and innovation, it gives creators of content certain exclusive rights over their works, while also leaving space for people to use and build upon existing works to create new works as well as products and services. Copyright has always left room for people to study, analyze, and learn from existing works. It should continue to leave room for people to do so using computers to create technologies like generative AI.

If copyright were expanded to limit how people may train generative AI on existing works, it would threaten businesses like ours and the sort of productive uses described above. By impeding the functioning and improvement of models that depend on wide ranges of data, it would create a significant hurdle to innovation and creativity.

In particular, increasing this burden would disproportionately affect startups and entrenches big incumbents. Large technology companies have many users and troves of in-house data they can use to develop new AI systems, and thus they would be less burdened by limitations on analyzing publicly accessible data. Large companies also have significant bargaining and purchasing power for acquiring large volumes of content. Other businesses would be cut off from these opportunities and face higher barriers to entry.

We appreciate the concerns that some artists and rightsholders have about how generative AI can be used in the context of art and entertainment, but we think that these concerns can be better addressed without jeopardizing the ongoing ability of AI innovators to train models on publicly available content. Policymaking that disproportionately focuses on what generative AI “may mean for the future of creative industries” threatens to create unintended consequences that will reverberate through the entirety of the U.S. economy. We look forward to continuing to

work with other stakeholders to ensure generative AI provides broad-based benefits, and encourage policymaking that takes into account the wide range of uses of generative AI.

Sincerely,

Companies & Organizations

[SV Angel](#)

[Heavybit](#)

[Common Crawl](#)

[Cradle](#)

[Wasaby.ai](#)

[Market AI](#)

[Vesta](#)

[El Cosmico Group](#)

[Blacklabs.ai](#)

[Civitai](#)

Individuals

[Hunter Walk](#)

[Glenn Ellingson](#)

[Autumn Qiuyuan Zhu](#)

[Bryan Silverthorn](#)

[Ian Turner](#)