



October 27, 2025

The Honorable Michael Kratsios  
Director  
Office of Science and Technology Policy  
1650 Pennsylvania Avenue  
Washington, D.C. 20504

**Subject:** [Request for Information on Regulatory Reform for Artificial Intelligence](#)

Dear Director Kratsios:

The National Association of REALTORS® (NAR) represents real estate professionals engaged in all aspects of the industry, including residential and commercial brokers, sales agents, property managers, appraisers, and more. We commend the Administration's leadership in removing barriers to artificial intelligence (AI) innovation and adoption and appreciate the opportunity to comment.

According to [NAR research](#), real estate professionals are among the largest consumer-facing users of AI, with 22% using generative AI daily for tasks ranging from customer service and market analysis to lead generation and operational efficiency. Increasingly, consumers rely on real estate professionals as the "human in the loop" when using AI for housing-related tasks, such as home shopping and estimating listing prices. While our members are trusted resources, they are not AI experts; however, they can connect clients with trained professionals and reliable information to help address their questions.

The main obstacle to broader AI adoption in real estate is the absence of clear "rules of the road" that reassure real estate professionals—most of whom operate small businesses—that they may safely rely on AI tools to be accurate, representative, and unbiased. Our members also seek assurance that using AI tools in good faith and in compliance with applicable laws will protect them from unwarranted legal exposure. As the Administration examines barriers to AI adoption, we support the development of federal standards, guidance, educational resources, and tools to help navigate the complex patchwork of federal and state laws.

### **State AI & Privacy Laws**

The real estate industry consists mostly of independent contractors and small businesses who routinely handle sensitive consumer and property information. However, state laws vary on consumer data privacy and now AI, complicating the use of AI across state lines. Our members support a uniform federal framework that preempts 50 different state laws and establishes light-touch standards to protect consumers on AI and data privacy.

### **Recommendations:**

- Encourage NIST and other relevant standards bodies to provide research, guidance, and standards for robust data privacy measures, including data provenance, watermarking, and secure-by-design AI architectures.
- Provide practical tools, training, and resources to help real estate professionals and consumers verify the authenticity of digital content and communications.

- Support education and outreach materials to help professionals safeguard sensitive consumer information when using AI tools.

### **Copyright Act**

Real estate professionals rely on copyrighted content, including listings, photos, and other materials, to help consumers buy and sell homes. Copyrighted content enables them to monetize their investments and grow their businesses, revenue that could be significantly impacted if content is vulnerable to scraping or use without permission. Our members support a balanced approach that advances AI innovation while maintaining strong copyright protections and providing practical guidance to safeguard their creative work as they adopt new AI tools.

#### Recommendations:

- Provide clear federal guidance to help real estate professionals and AI developers understand when copyright protections apply to AI-assisted works.
- Encourage practical, plain-English resources on licensing and fair use, so members know how to use AI tools responsibly and protect their creative content.
- Support innovation by removing unnecessary barriers to AI adoption, while ensuring creators' rights are respected.
- Promote transparency and accountability in the use of AI for real estate marketing and communications.
- Foster public-private partnerships to develop privacy-preserving and copyright-respecting AI solutions.

### **Fair Housing Act**

AI models trained on historic housing data may produce biased outputs. Tools used to help consumers access housing must comply with applicable laws, including the Fair Housing Act. However, there are currently few technical standards or guidance to validate that these systems are consistently accurate, representative, and unbiased. Our members would benefit from clear federal guidance and standards to confidently use AI while ensuring compliance with fair housing laws.

#### Recommendations:

- Provide clear guidance on how real estate professionals can use AI to serve consumers while remaining compliant with federal law.
- Establish a safe harbor for real estate professionals who follow federal guidance.
- Offer non-technical, easy-to-understand educational materials for real estate professionals and consumers.
- Encourage NIST and other standards bodies to develop trustworthy AI frameworks usable by small businesses and professional associations.
- Incorporate ethical principles, including fairness, transparency, accountability, privacy, and human oversight, into federal guidance and technical standards for AI.

**Conclusion**

The real estate industry is central to helping Americans achieve the dream of homeownership and is a vital proving ground for responsible AI. Clear federal guidance, robust research, and practical education will allow our members to adopt AI confidently, protect consumers, and advance fair housing.

Thank you for the opportunity to comment. NAR stands ready to collaborate with OSTP and other agencies to ensure that AI innovation in housing technology reflects America's values of fairness, privacy, and opportunity for all.

Sincerely,



President, National Association of REALTORS®