How Do AI Companies "Fine-Tune" Policy? Examining Regulatory Capture in AI Governance

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Executive Summary

Industry actors in the United States have gained extensive influence in conversations about the regulation of general-purpose artificial intelligence (AI) systems. examines the ways in which industry influence in AI policy can result in policy outcomes that are detrimental to the public interest, i.e., scenarios of "regulatory capture." First, we provide a framework for understanding regulatory capture. Then, we report the results from 17 expert interviews identifying what policy outcomes could constitute capture in AI policy and how industry actors (e.g., AI companies, trade associations) currently influence AI policy. We conclude with suggestions for how capture might be mitigated or prevented.

In accordance with prior work, we define "regulatory capture" as situations in which:

1. **A policy *outcome* contravenes the public interest.** These policy outcomes are characterized by regulatory regimes that prioritize private over public welfare and that could hinder such regulatory goals as ensuring the safety, fairness, beneficence, transparency, or innovation of general-purpose AI systems. Potential outcomes can include changes to policy, enforcement of policy, or governance structures that develop or enforce policy.
2. **Industry actors exert influence on policymakers through particular *mechanisms* to achieve that policy outcome.** We identify 15 mechanisms through which industry actors can influence policy. These mechanisms include advocacy, revolving door (employees shuttling between industry and government), agenda-setting, cultural capture, and other mechanisms as defined in Table 0. Policy outcomes that arise absent industry influence—even those which may benefit industry—do not reflect capture.

To contextualize these outcomes and mechanisms to AI policy, we interview 17 AI policy experts across academia, government, and civil society. We seek to identify possible outcomes of capture in AI policy as well as the ways that AI industry actors are currently exerting influence to achieve those outcomes.

With respect to potential captured outcomes in AI policy, experts were primarily concerned with capture leading to a lack of AI regulation, weak regulation, or regulation that over-emphasizes certain policy goals above others.

Experts most commonly identified that AI industry actors use the following mechanisms to exert policy influence:

- **Agenda-setting (15 of 17 interviews):** Interviewees expressed that industry actors advance anti-regulation narratives and are able to steer policy conversations toward or away from particular problems posed by AI. These actors, including AI companies, are also able to set default standards, measurement metrics, and regulatory approaches that fail to reflect public interest goals.
- **Advocacy (13):** Interviewees were concerned with AI companies' and trade associations' advocacy activities targeted at legislators.
- **Academic capture (10):** Interviewees identified ways that industry actors can direct research agendas or promote particular researchers, which could in turn influence policymakers.
- **Information management (9):** Interviewees indicated that industry actors have large information asymmetries over government actors and are able to shape policy narratives by strategically controlling or releasing specific types of information.

To conclude, we explore potential measures to mitigate capture. Systemic changes are needed to protect the AI governance ecosystem from undue industry influence—building technical capacity within governments and civil society (e.g., promoting access requirements, providing funding independent of industry, and creating public AI infrastructure) could be a first step towards building resilience to capture. Procedural and institutional safeguards may also be effective against many different types of capture; examples include building regulatory capacity in government, empowering watchdogs, conducting independent review of regulatory rules, and forming advisory boards or public advocates. Other mitigation measures that are specific to different types of industry influence are outlined in Table 0.

Although additional research is needed to identify more concrete solutions to regulatory capture, we hope that this article provides a starting point and common framework for productive discussions about industry influence in AI policy.

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Mechanism	Definition	Potential Mitigations
Personal Engagement		
Advocacy	Industry actors directly participate in formal policy making processes—e.g., interacting directly with policymakers or regulators to provide information or convince them of a particular point of view.	• Increase transparency requirements • Build robust civil society institutions
Procedural obstruction	Industry actors intentionally impede policymaker or regulator action through procedural interference.	• N/A; additional research needed
Incentive Shaping		
Donations, gifts, and bribes	Industry actors make financial contributions to elected officials' campaigns, or give personal gifts to elected officials (or their staff).	• Increase transparency requirements • Build robust civil society institutions
Private threats	Industry actors make explicit or implicit threats of litigatory, reputational, or other negative consequences to prevent policy enactment or enforcement.	• N/A to the United States
Revolving door	Industry actors hire government officials, regulators, policymakers, or their staff; or employees of industry actors leave to work for government officials, regulators, or policymakers.	• Strengthen and enforce government ethics policies such as conflict-of-interest reviews • Fund and provide AI-specific training for government ethics offices • Invest in regulator salaries, work environments, and professional development to make government careers more desirable
Information Capture		
Agenda-setting	Industry actors emphasize or de-emphasize particular perspectives or data, set priorities in policy conversations, or frame regulatory problems in ways that favor industry actors. Regulators may then adopt such views—e.g., goals, norms, practices, activities, and models of risks and markets.	• Increase access for non-industry stakeholders to policy processes, particularly at early stages of policy development (to address all information capture mechanisms) • Consider consumer empowerment programs to enable civic participation (to address all information capture mechanisms) • Institute reporting and monitoring requirements to raise regulatory visibility and verify industry information (to address all information capture mechanisms)
Information management	Industry actors selectively share, control access to, withhold, or provide misleading or false information to policymakers or regulators.	
Information overload	Industry actors inundate policymakers or regulators with similar information or communications supporting their points of view, which challenges the ability of regulators to process and interpret the information.	

Table 0: Mechanisms of industry influence in the policy process (cont'd on next page)

Mechanism	Definition	Potential Mitigations
Cultural Capture		
Group identity	Policymakers or regulators may be "more likely to adopt positions advanced by people whom they perceive as being their in-group" (Kwak 2013).	• N/A; additional research needed
Relationship networks	Policymakers or regulators may be "more likely to adopt positions advanced by people who are in their social networks" (Kwak 2013).	
Status	Policymakers or regulators may be "more likely to adopt positions advanced by people whom they perceive to be of higher status in social, economic, intellectual, or other terms" (Kwak 2013).	
Indirect Capture		
Academic capture	Industry actors influence academic actors, who may then influence policymakers or regulators.	• Provide funding sources independent of industry • Increase non-industry career opportunities • Ensure academic access to compute and data resources
Private regulator capture	Industry actors influence private organizations that serve regulatory functions—e.g., auditors or standards-setting bodies.	• Provide funding sources independent of industry
Public relations	Industry actors engage in direct public communications, which may then influence policymakers or regulators directly or via shaping public opinion.	• Increase transparency requirements • Build robust civil society institutions
Media capture	Industry actors influence journalists or outputs from media channels, which may then influence policymakers or regulators directly or via shaping public opinion.	• Increase transparency requirements • Build robust civil society institutions

Table 0: Mechanisms of industry influence in the policy process (cont'd)

Contents

List of Figures

List of Tables

Readers' Guide[1]

We recommend the following reading strategies for different types of readers:

- **2-minute read**: Read Table 0 in full. Browse the interview results in Figure 1 (interview responses to the goals of AI regulation), Figure 2 (interview responses to actors influencing AI policy), and Figure 3 (interview responses to the mechanisms of industry influence in AI policy).
- **10-minute read**: Start with the Executive Summary. Skip Table 0 but read through the definitions in Table 2. Finish with Section 6, on preventing and mitigating capture.
- **Policymakers**: Start with the Executive Summary, particularly Table 0. Browse the interview results in Figure 1 (interview responses to the goals of AI regulation), Figure 2 (interview responses to actors influencing AI policy), and Figure 3 (interview responses to the mechanisms of industry influence in AI policy). Then read Section 6 on preventing and mitigating capture.
- **AI governance researchers**: Start with Section 2 (defining regulatory capture) before reading the results in Sections 4 and 5. Finish with Section 6 on preventing and mitigating capture.
- **AI developers/researchers**: Start with Section 2 (defining regulatory capture), then read the discussions on academic capture in Section 5.5 and in the penultimate paragraph of Section 6. Optionally, read in full the interview results and suggested capture mitigation measures in Sections 4, 5, and 6.

[1] Inspired by Weidinger et al. (2021) and Weidinger et al. (2023).

1 Introduction

Jurisdictions around the world are proposing or implementing regulations of general-purpose artificial intelligence (AI) systems (IAPP 2024; Lexis 2024). As AI policy develops, industry players—including AI developers; AI deployers; trade associations; cloud companies; and providers of tools, services, or hardware used in AI development or deployment—have gained widespread influence in AI policy. In the European Union (EU), industry actors have fought against the regulation of general-purpose AI and foundation models in the EU AI Act (CEO 2022, 2023; Bertuzzi 2023; Perrigo 2023; Lomas 2023; Neerven 2023). In the United States, the number of lobbyists working on AI-related issues in 2023 increased by 120% relative to 2022, with 85% of lobbyists hired by industry organizations (Cheng and Tanglis 2024).

Industry participation is essential in the policy process, but it can also lead to regulatory capture: situations in which industry co-opts regulatory regimes to prioritize private over public welfare. In the context of AI governance, industry influence that leads to capture can impede effective AI regulation and harm public interests (Chomanski 2021; Dal Bó 2006) because AI companies' goals and incentives are not always aligned with those of the public (Khanal, Zhang, and Taeihagh 2024). Commentators have warned that regulatory capture could result in general-purpose AI policies and enforcement practices that are ineffective, unsafe, or unjust—or even no regulation at all (Roberts et al. 2021; Guha et al. 2024; Goodman 2024; Mollman 2023; von Thun 2023). Understanding what capture is, how it could occur, and how it might be mitigated is therefore critical to ensuring that AI policy promotes the public interest.

This article aims to fill a gap in the literature on industry influence and regulatory capture in AI policy. Our main contributions are to outline what types of policy outcomes could constitute regulatory capture, explain the main channels through which industry actors are currently influencing US AI policy and attempting to achieve those outcomes, and discuss how different forms of influence and capture can be addressed. To answer these questions, we conducted 17 semi-structured expert interviews and a survey of observational data. We focus our discussion on corporate influence in US policy for general-purpose AI systems,[2] and we hope to provide a framework for productive discussions of capture in AI governance.

2 Defining "Regulatory Capture"

Investigations of regulatory capture in general-purpose AI policy have been limited, even though concerns about capture have permeated AI governance research (Hendrycks, Mazeika, and Woodside 2023; Hadfield and Clark 2023; Whyman 2023; Thierer and Chilson 2023), legislative testimony (Lawrence et al. 2023), media coverage (Herrman 2023; Thornhill 2023; Davis 2023), and public discourse (Goanta et al. 2023; All-In Podcast 2023; Marcus 2023b; LeCun 2023; Tegmark 2023; Renieris 2023; Delangue 2023). These discussions have been incomplete: Commentators often only discuss capture in passing, do not focus on *how* capture occurs, or consider only the classical model of capture in which monopolists attempt to raise barriers to entry through over-regulation (see Appendix B). The sincerity of some discourse is also questionable, particularly when corporate actors levy accusations of capture that seem to serve their own interests (Yackee 2022; e.g., Andreessen Horowitz 2023; Andreessen 2023; Altman, Marcus, and Montgomery 2023; NquiringMinds 2023; OpenUK 2023; Delangue 2023; LeCun 2023).

In the social science literature, the phenomenon of regulatory capture has been well-theorized since Stigler (1971). Definitions of regulatory capture vary widely (Mitnick 2011), partly because of the heterogeneity of forms of capture (Carpenter 2013b), but the consensus is that capture requires industry influence in the policy process (Dal Bó 2006). Adapting from Carpenter (2013b), Wren-Lewis (2011), and Dal Bó (2006), we define "regulatory capture" as consisting of (1) a policy *outcome* contravening the public interest that (2) results from industry influence exerted on policymakers through particular *mechanisms*.[3]

We emphasize that not all industry influence reflects regulatory capture. To the contrary, some industry participation in policy processes is both inevitable and desirable, especially when it provides regulators with greater visibility and technical expertise (Slayton and Clark-Ginsberg 2018; Kaminski 2022; Thaw 2014; Wansley 2015)—both of which are particularly important in AI (Anderljung et al. 2023a; Scherer 2016). Capture occurs only when corporate influence leads to regulation that unjustly prioritizes private interests over public ones (Wren-Lewis 2011).

We developed and present in Sections 2.1 and 2.2 a framework that encapsulates the range of models of regulatory capture.

2.1 Outcomes of Regulatory Capture

A necessary condition for regulatory capture is a policy *outcome* contravening the public interest. Capture would not occur, e.g., if industry actors successfully influenced policymakers to implement policies beneficial to the public or if a policy beneficial to the public were to be implemented despite industry opposition. Although the public interest is often ill-defined, the social science literature cites catastrophic safety incidents, financial downturns, and monopolistic market structures as outcomes in contravention of the public interest.

[2] See Appendix A for a definition of "general-purpose AI systems." See also EU AI Act, Art. 3(63); Gutierrez et al. (2023); Triguero et al. (2024); Xia et al. (2024).

[3] In AI governance, most commentators use the term "regulatory capture" to refer to the model of capture presented in Stigler (1971), in which market incumbents support stringent regulations (such as licensing requirements) to block new market entrants. Our definition is aligned with the modern academic literature on regulatory capture: That definition is more expansive and would also include, e.g., companies lobbying to *weaken* instead of strengthen regulations.

Category	Examples
Policy content	• Regulations are too weak to protect the public (or are nonexistent) (Carpenter 2013a; Papyshev and Yarime 2022). • Regulation creates high barriers to entry that protect market incumbents (Stigler 1971; Barrett 2004). • Product standards are set to favor (particular) industry players (Berman 2017). • Regulations make suboptimal value trade-offs between, e.g., safety and justice (Guha et al. 2024; Wong 2023).
Policy enforcement	• Policies are not enforced, or exceptions are created, for particular companies (Teachout and Khan 2014). • Enforcement is biased toward a subset of firms (Mariniello, Neven, and Padilla 2015).
Governance structures	• Agencies lack funding to enact or enforce policies (Shapiro 2012; Neudert 2023). • A lack of uniform rules allows regulated entities to engage in regulatory arbitrage (Etzioni 2009). • An agency's dual mandate results in the agency achieving only one mandate (Carrigan 2013; Rex 2020). • Suboptimal federal policies preempt state policies (Carpenter 2013a).

Table 1: Examples of outcomes of regulatory capture

The classic model of regulatory capture emphasizes industry influence on a regulator leading to price-fixing or anti-competitive conditions that protected market incumbents, usually via over-regulation of prospective market entrants in industries with natural monopolies (Stigler 1971; Dal Bó 2006; Rex 2022). However, the literature has since developed broader models that account for *under-regulation* (Carpenter 2013a) or for influence across various governmental entities (Magill 2013; Anderson 2018; Rex 2022, 2020). We use "regulatory capture" as an umbrella term for all these models of capture.

Resolving the question of which outcomes are "properly" considered capture of AI policy is beyond the scope of this article because the goals of general-purpose AI regulation are contested and sometimes conflicting. However, discourse about capture in AI policy can benefit from understanding how these models of capture operate. We categorize the ways in which policy outcomes can diverge from the public interest as affecting the content of government policies, the enforcement of government policies, or the institutional structures of regulation. Examples of outcomes in each category are outlined in Table 1.

2.2 Mechanisms of Industry Influence

Industry actors can seek the outcomes outlined above by exerting influence on the policy process; capture occurs when these actors succeed. Therefore, policy failures absent corporate involvement are not capture, and neither is corporate influence that does not result in an outcome contravening the public interest. We distinguish between direct and indirect *mechanisms* of capture, and definitions for all mechanisms are provided in Table 2.

Direct mechanisms are channels of influence immediately exerted on policymakers—including legislatures, regulatory agencies, courts, White House offices, and individual staffers or officials. We introduce four categories of direct mechanisms:

- *Personal engagement*: Industry actors directly participate in formal policy making processes. Mechanisms in this category are *advocacy* (Barkow 2010; Etzioni 2009; de Figueiredo and Richter 2014; Godwin, Ainsworth, and Godwin 2013) and *procedural obstruction* (R16[4]).
- *Incentive shaping*: Industry actors offer positive or negative incentives to shape policymakers' decisions. Mechanisms in this category are *donations and gifts* (Aggarwal, Meschke, and Wang 2012; Kuntze and Mertins 2023),[5] *private threats* (Dal Bó 2006; Brezis and Wiist 2011),[6] and *revolving door* (Rex 2022; De Chiara and Schwarz 2021; Tabakovic and Wollmann 2018).
- *Information capture*: Industry actors shape policymakers' information environment. Mechanisms in this category are *agenda-setting* (Bachrach and Baratz 1962; Li 2023; Walters 2019; Baxter 2011; Shapiro 2012; King and Hayes 2018; Rilinger 2023), *information management* (Mitnick 2015; Rilinger 2023; Shapiro 2012; Dal Bó 2006), and *information overload* (Wagner 2009; Heims and Moxon 2023).
- *Cultural capture*: Capture is made more likely by policymakers' and industry actors' shared underlying assumptions or backgrounds, including *group identity* (Kwak 2013; Caprio 2013), *relationship networks* (Kwak 2013; Caprio 2013; Rex 2020), and *status* (Goanta et al. 2023; Saltelli et al. 2022; Bode and Huelss 2023; Perlman 2020; Kwak 2013). Unlike the previous types of influence, cultural capture is less clear-cut and can consist of industry actors creating new or taking advantage of pre-existing social dynamics.

Indirect mechanisms are channels of influence exerted on intermediaries—academics and think tanks (Abdalla and Abdalla 2021), the media (Schiffrin 2021), private regulators (Laux, Wachter, and Mittelstadt 2021; Berman 2017; Tartaro, Smith, and Shaw 2023; Terzis, Veale, and Gaumann 2024; Casper et al. 2024), or the public—who in turn influence policymakers. Corporate influence exerted on these intermediaries can occur

[4]These citations indicate expert interviews. See Table 3.

[5]Bribes also fall within this category but are illegal. We consider bribes to be less relevant to the United States—though they are discussed in the regulatory capture literature in non-US contexts (see Dal Bó 2006)—and thus exclude bribes from our discussion below.

[6]Private threats include coercion (Dal Bó 2006). We consider private threats to be less relevant in the United States, so we exclude this mechanism from our discussion below.

through the mechanisms outlined above, as well as other mechanisms specific to the relevant intermediaries. Note that indirect capture requires that influenced intermediaries in turn influence policy to create the types of outcomes described in Section 4.

Mechanism	Definition	Examples
Personal Engagement		
Advocacy	Industry actors directly participate in formal policy making processes—e.g., interacting directly with policymakers or regulators to provide information or convince them of a particular point of view.	Activities include lobbying, private meetings, speaking events, public hearings, constituent engagement, court filings (*amicus* briefs).
Procedural obstruction	Industry actors intentionally impede policymaker or regulator action through procedural interference.	An industry actor participates in a standards-setting committee and repeatedly stalls the conversation; an industry actor files multiple lawsuits against a regulatory agency to prevent enforcement; an industry actor files many requests for reconsideration or to otherwise slow down policy enforcement.
Incentive Shaping		
Donations, gifts, and bribes	Industry actors make financial contributions to elected officials' campaigns, or give personal gifts to elected officials (or their staff).	A company donates money to a Congress member's campaign; a company gives free vacations to an agency staff member.
Private threats	Industry actors make explicit or implicit threats of litigatory, reputational, or other negative consequences to prevent policy enactment or enforcement.	Regulators decline to investigate a company because they believe that the company would sue; a policymaker stops advocating for a policy because they are wary of negative press coverage; a company threatens to release material that would portray a policymaker in a negative light.
Revolving door	Industry actors hire government officials, regulators, policymakers, or their staff; or employees of industry actors leave to work for government officials, regulators, or policymakers.	A company hires a legislator's chief of staff; a general counsel of a company is nominated for a political appointment.
Information Capture		
Agenda-Setting	Industry actors emphasize or de-emphasize particular perspectives or data, set priorities in policy conversations, or frame regulatory problems in ways that favor industry actors. Regulators may then adopt such views—e.g., goals, norms, practices, activities, and models of risks and markets.	A company frames industry regulation as a question of regulating downstream users or upstream producers (but not of the company itself); a company tells policymakers or regulators that particular policy goals are more important than other ones when thinking about regulating the industry, which then results in industry-biased regulation; many companies coordinate to repeat the same message to policymakers so that policymakers perceive a "united front" of industry voices on a particular issue.
Information management	Industry actors selectively share, control access to, withhold, or provide misleading or false information to policymakers or regulators.	A company fails to report important information about its product or business practices to regulators/policymakers; a company makes a presentation to a policymaker/regulator in which they highlight the benefits of their technology but fail to discuss its risks.
Information overload	Industry actors inundate policymakers or regulators with similar information or communications supporting their points of view, which challenges the ability of regulators to process and interpret the information.	Industry actors organize a comment submission drive and overwhelm the notice-and-comment process with comments favorable to the industry position; industry actors send (or organize) a barrage of phone calls, letters, or other communications to a policymaker to create the illusion of support for their position.

Table 2: Mechanisms of industry influence in the policy process (cont'd on next page)

Mechanism	Definition	Examples
Cultural Capture		
Group identity	Policymakers or regulators may be "more likely to adopt positions advanced by people whom they perceive as being their in-group" (Kwak 2013).	A regulator was formerly a business executive and identifies with employees in that industry as people of the same trade; a company sends a lobbyist of the same gender and ethnic background as a legislator to speak to them, in the hopes that the legislator would be more sympathetic.
Relationship networks	Policymakers or regulators may be "more likely to adopt positions advanced by people who are in their social networks" (Kwak 2013).	A legislator has a relative who works in a particular industry, and the legislator adopts their relative's views about regulating that industry after speaking to them; a regulator regularly plays golf with trade association executives, and the regulator begins to adopt industry-friendly views after discussing policy issues with those executives.
Status	Policymakers or regulators may be "more likely to adopt positions advanced by people whom they perceive to be of higher status in social, economic, intellectual, or other terms" (Kwak 2013).	A policymaker adopts the views of a someone testifying at a hearing because of their status as a technical expert; a legislator wishes to associate with CEOs in an industry that many people consider "hot" and "the next big thing", and adopts industry-friendly views as a result.
Indirect Capture		
Academic Capture	Industry actors influence academic actors, who may then influence policymakers or regulators.	A company funds an academic's research; a company donates a large sum to a think tank; a company donates to a university to set up a research lab.
Private regulator capture	Industry actors influence private organizations that serve regulatory functions—e.g., auditors or standards-setting bodies.	A company actively participates in standards-setting, and the standards are then adopted by regulators; a company develops a close relationship with its auditors, leading to ineffective audits.
Public relations	Industry actors engage in direct public communications, which may then influence policymakers or regulators directly or via shaping public opinion.	A company puts out a press release or runs an advertising campaign supporting or opposing a regulation.
Media Capture	Industry actors influence journalists or outputs from media channels, which may then influence policymakers or regulators directly or via shaping public opinion.	A company puts out paid media pieces advocating for its policy stances.

Table 2: Mechanisms of industry influence in the policy process (cont'd)

3 Methods

We conducted 17 semi-structured interviews with AI policy experts.[7] An expert interview method is appropriate for our research questions because most information about industry influence is non-public. Additionally, political influence—and regulatory capture in particular—is difficult to measure quantitatively, and our data captures many informal interactions and processes (Soest 2023). Interviews were anonymous to enable more in-depth conversations about the policy process. The study protocol was approved by the Human Subjects Protection Committee at RAND.

We also examined observational data on industry influence in AI governance: media sources, academic research, online discourse, and other public artifacts. This data can help corroborate and triangulate our findings (Beyers et al. 2014); observational data was gathered through targeted Google searches. Finally, we conducted a scoping review of the AI governance literature mentioning regulatory capture, with details and results in Appendix B. This review helped inform our definitions in Section 2 and generate examples discussed in interviews.

3.1 Interviewee Selection

We used expert and convenience sampling methods to identify interviewees, who were selected based on their academic or professional expertise in AI policy, as identified by: employment at a relevant government or civil society institution (ATIH 2024; Hicock n.d.), membership on lists of AI policy experts (TheBridge 2024; OECD n.d.; Sourcelist n.d.; WAIE 2024), Google search, and referrals from individuals known to the authors. The first author contacted the interviewees and collected consent forms via email.

We primarily recruited experts located in the United States but also included some based in the United Kingdom and the European Union. To maintain sample diversity and reduce bias, we purposively invited experts with diverse demographic, organizational, and ideological backgrounds. We did not contact any experts currently affiliated with companies that develop general-purpose AI models. Experts' backgrounds are described in Table 3.[8]

Although a sample size of $n = 17$ is relatively small, saturation (Fusch and Ness 2015; Saunders et al. 2018) in qualitative interview studies has been achieved with comparable or even smaller sample sizes (Hennink and Kaiser 2022; Guest, Bunce, and Johnson 2006). The nascency of AI regulation, especially in the United States, and the correspondingly small number of professionals in the field further justifies a smaller sample size (Baker, Edwards, and Doidge 2012).

3.2 Interview Protocol

All interviews were conducted online by the first author in January–February 2024 and lasted 40–60 minutes each. At the beginning of each interview, the first author described to interviewees the goals of this study and detailed our practices for protecting interviewee confidentiality. They then verbally re-obtained consent to record the interviews, to use the descriptions reported in Table 3, and to use transcribed quotes.[9]

They identified to interviewees the focus of these interviews as being government policy related to AI. They defined "AI systems" as "general-purpose AI systems that have a wide variety of use cases, rather than narrow or domain-specific AI systems" and "AI policy" as "government policies intended to regulate, restrict, or promote the development and deployment of general-purpose AI systems."

The interview protocol was designed to elicit information about industry actors' preferred policy outcomes that could constitute capture, as well as what mechanisms of influence industry actors are currently using to facilitate those outcomes. Interviewees were first asked about the public interest goals of AI regulation, the types of industry actors involved in AI policy, and the policy goals of those actors. The first author then presented interviewees with a table of influence mechanisms (an early version of Table 2), asked interviewees to list any additional mechanisms of influence, and asked which mechanisms were currently most relevant to AI policy. Where interviewees indicated that industry actors used a specific mechanism to influence policy, they asked follow-up questions asking for examples of such influence, what mitigation measures were in place to curb it, whether and why those measures were effective, and whether similar dynamics existed in other industries. The full interview protocol is contained in Appendix A.

3.3 Data Analysis

The first author transcribed the interviews with the assistance of a private OpenAI Whisper instance, then de-identified the interview transcripts following Saunders, Kitzinger, and Kitzinger (2015) and Stam and Diaz (2023). In preliminary analysis, the first and second authors deductively developed codes for the goals of AI regulation, the types of actors involved in AI regulation, and the mechanisms through which industry actors influenced the policy process. The third and fourth authors then independently coded the de-identified transcripts, and the first and second authors subsequently refined the codes and adjudicated any disagreements in coding using an open discussion method (Chinh et al. 2019). The final coding manual for influence mechanisms was substantially similar to the table presented in Table 2. Agreement between coders was very high.[10]

[7] We conducted one group interview, so we spoke with more than 17 experts in total. Group interviewees were not assigned distinct IDs in Table 3.

[8] Given the small size of our population of interest, demographics are not reported to protect interviewee confidentiality.

[9] When interviewees did not consent to recording, analysis was performed with the first author's contemporaneous interview notes.

[10] We do not provide quantitative inter-rater reliability metrics, as ease of coding was relatively high (McDonald, Schoenebeck, and Forte 2019) and as there were few disagreements between coders.

ID	Type	Role
R1	Government	A congressional staffer
R2	Government	A former congressional staffer
R3	Academia/research	An academic in a university studying technology policy
R4	Academia/research	An academic who has worked on AI in different sectors
R5	Academia/research	An AI ethics researcher
R6	Academia/research	A policy analyst working on technology issues
R7	Academia/research	An expert at a technical research organization
R8	Civil society	An executive at a US advocacy group that works on technology issues
R9	Civil society	An executive at a US think tank working on technology policy issues
R10	Civil society	An expert at a US think tank
R11	Civil society	An economist at a US think tank
R12	Civil society	A leader at a US think tank working on technology policy issues
R13	Civil society	Grantmakers at a philanthropic foundation focused on technology
R14	EU civil society	A researcher at a technology policy think tank
R15	EU civil society	A policy executive at a think tank
R16	EU civil society	An employee of an EU think tank working on technology policy
R17	UK civil society	A policy expert at a UK think tank

Table 3: Overview of interviews, with interview IDs and descriptions of experts' roles

4 Outcomes of Regulatory Capture in US AI Policy

In this section, we present our findings on what policy outcomes could constitute regulatory capture in US AI policy.

Defining the public interest goals of general-purpose AI regulation—which is necessary to diagnose capture—is controversial. When we asked interviewees to identify goals that would be in the public interest when regulating general-purpose AI systems, responses included 14 distinct goals. Although experts indicated in 15 of 17 interviews that regulation should attempt to prevent harms from AI, they diverged on the specific possible goals of regulation such as community empowerment, innovation, competitiveness, and legal certainty (Figure 1). These results are perhaps unsurprising given the variety of stakeholders and interests that could be affected by general-purpose AI systems, because "AI is . . . coming for every sector and industry" (R13).

Similarly, interviewees identified many actors in the AI industry who are participating in the policy process. Figure 2 presents a frequency chart of the number of interviews that mentioned each type of actor as participating in AI policy. Any mentions of specific companies or industry actors were re-coded into one of the categories below. Actor categories, definitions, and examples are presented in Table 4.

Interviewees noted that industry actors had many incentives and that these incentives sometimes differed. Some incentives that interviewees attributed to these actors when they influenced policy included: "to look good" (R7), "keeping regulatory burden . . . low" (R16), "to maximize their profit" (R6), "regulatory certainty, that regulations don't just fluctuate every second" (R10), and "to preserve the ability to research and deploy AI systems" (R12). Moreover, although "it is easy to think about industry or industry actors as monolithic . . . there are a variety of . . . industry actors who engage with policy conversation[s] with different motivations" (R12). While different industry players desire different and sometimes opposing policy outcomes, many of these outcomes conflict with some of the policy goals in Figure 1.

Actor	Definition
AI deployers	Companies that are deploying AI products or services
AI developers	Companies that are building AI models or products
Cloud companies	Companies that provide virtual computing services but do not primarily manufacture hardware
Data/input providers	Companies that provide datasets, data labeling services, or technical infrastructure or services to AI developers
Hardware producers	Companies that produce computing hardware
Hired lobbyists	External lobbyists paid to advocate on behalf of industry actors listed elsewhere in this table
Industry groups	Membership organizations consisting of industry actors listed elsewhere in this table
Venture capital	Financial firms that provide funding to early-stage AI developers or deployers

Table 4: Definitions for industry actors participating in the policy process

Notably, most interviewees did not believe that the current state of general-purpose AI policy in the United States reflects capture, but many expressed concern with existing, high levels of industry influence. We caution against conclusions that AI policy has already been "captured"; accusations of regulatory capture in the United States while regulatory debates are ongoing can be premature and thus confusing (Wexler 2011) or counterproductive (e.g., Adler 2021).

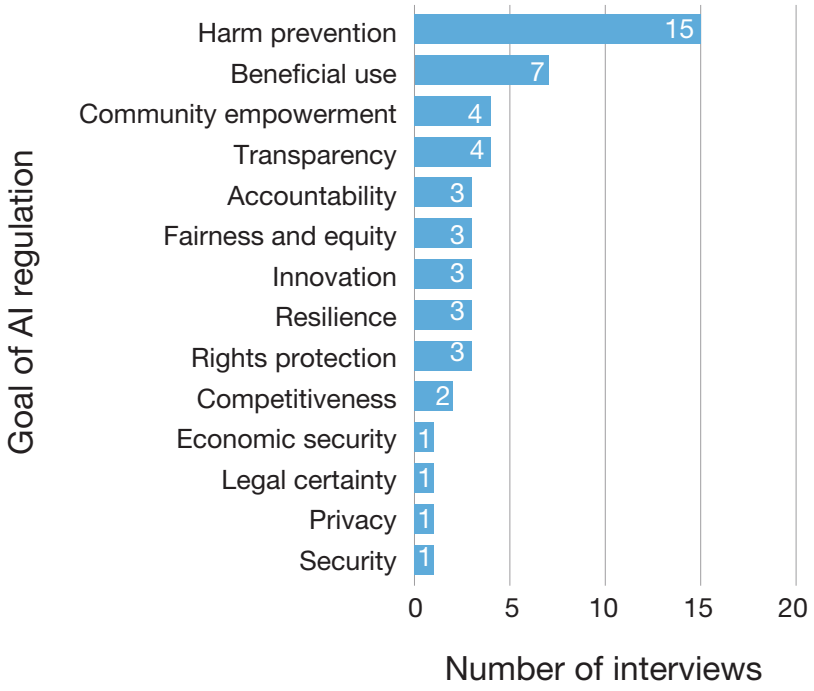

Figure 1: Goals of AI regulation suggested by interviewees

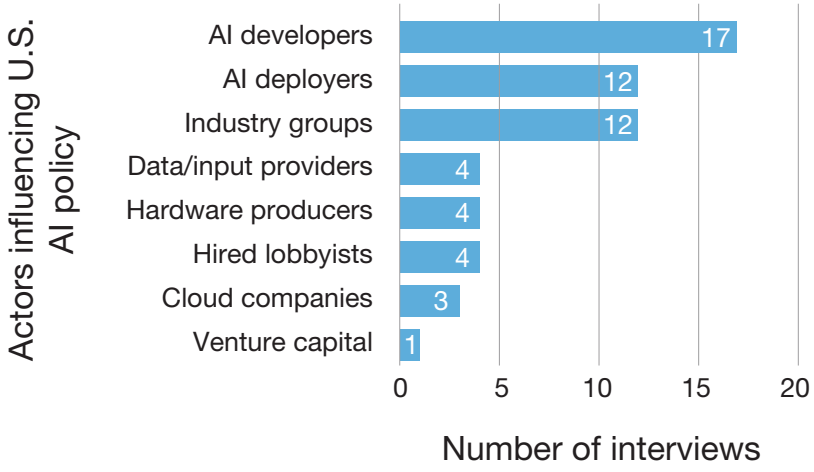

Figure 2: Industry actors mentioned by interviewees as exerting policy influence

Overall, however, our interviews do suggest that it is important to remain vigilant about industry influence resulting in policy outcomes detrimental to the public interest.[11]

Of the types of outcomes resulting from regulatory capture, interviewees most often described outcomes related to the content of government policy, with substantially less discussion of policy enforcement and governance structures. We discuss below each of these outcome categories in turn.

[11]Given the experiences of other industries (Yeoh 2019) and on such issues as data privacy and content moderation (Hildén 2019; Neudert 2023; Thierer and Skorup 2013), current levels of corporate influence in AI governance appear to raise real risks of capture.

4.1 Policy Content

Unlike much of the public discourse and the original literature on capture—suggesting that incumbents may seek overregulation to protect their market advantages—the majority of interviewees expressed concerns that industry capture could result in regulation that is *too weak* (or in no regulation at all). Examples of such outcomes included: "weak requirements baked into legally binding requirements" (R14), "creat[ing] an exemption for [particular companies]" (R2), "remov[ing] requirements on those who are developing general-purpose AI models and hav[ing] requirements on [deployers]" (R15), and limiting regulation to industry self-

regulation (R8). Interviewees referenced specific industry attempts to weaken the EU AI Act by expansively defining an open source exemption and by raising compute thresholds to narrow the definition of advanced models (R14; Coulter et al. 2023).

Interviewees noted that corporate actors occasionally do advocate for regulation. However, interviewees offered disparate explanations for when and why companies would do so. One expert stated that some companies could "very much [be] on board with the idea that protection of public health and safety should be a priority" (R6). Other interviewees were more skeptical: R12 conveyed that although some industry actors may genuinely support regulations, their policy positions can be distorted and "be accidentally or purposely co-opted" by actors with more self-interested goals. R13 said that certain large companies may support regulation for political advantage when competitors are engaging in politically unpopular behavior—e.g., around consumer privacy. And for R2, large companies may wish to simply codify their existing practices into regulation so that they can avoid increased investments in compliance while forcing "competitors . . . to be operating at that level."

On the other hand, only three interviewees discussed industry actors' use of AI policy to affect market competition. Of these, R9 noted that developing competitive moats through regulation is not currently a goal of AI companies because AI developers have yet to successfully commercialize their products, while R11 expressed that building regulatory barriers to entry "just simply doesn't apply when we're talking about billion-dollar training runs."

Finally, general-purpose AI regulations could embody suboptimal trade-offs among public interest goals: "There's a really active sort of battle for the soul of AI regulation right now" (R13). Specific goals may be over- or underemphasized in AI regulation, which could neglect particular rights or interests (R5).

4.2 Policy Enforcement

Another potential outcome of regulatory capture is uneven enforcement of government policy, on either an ad hoc or systematic basis. Although interviewees discussed these outcomes relatively less frequently—likely because no general-purpose AI regulations are currently being enforced in the United States, United Kingdom, or European Union—they raised concerns that historically lax enforcement practices on the technology industry could be repeated in AI regulation. Describing Facebook's enablement of racially targeted housing advertisements on its platform, R13 explained that:

> "all sorts of rules have been allowed to be broken for sometimes like 10 years . . . because the enforcement community didn't understand what was happening and didn't have the capacity to go and extend those historic rules [to the technology industry] . . . every year that goes by that historic rules are not enforced in the digital environment normalizes the lack of enforcement, the lack of protections . . . So the [technology] systems have been built now in ways that protections we used to have don't exist anymore."

Relatedly, AI companies could also adopt "the kind of Uber model of 'let's just disrupt the taxi commissions and then they have to legalize us' " (R11).

4.3 Governance Structures

No experts suggested that industry actors are currently seeking to facilitate capture through governance structures.

5 Mechanisms of Industry Influence in US AI Policy

In this section, we present findings from interviews and from observational data about which mechanisms of influence (from Section 2.2) industry actors are currently employing to facilitate captured outcomes (from Section 4).

Figure 3 displays the influence mechanisms from Section 2.2, along with the number of interviews in which experts indicated each mechanism to be important in AI policy. Extended definitions and examples are in Table 2. Our discussion proceeds according to these categories of mechanisms.

5.1 Personal Engagement

Advocacy. Thirteen interviewees listed advocacy as one of the most important influence mechanisms in AI policy. Advocacy activities include, e.g., salon dinners and other social events (R5; R9; R10), private meetings (R2; R12; R15), and informational events or panels (R16). These interactions are facilitated by social norms because "elected officials kind of have to meet with [lobbyists] . . . There's a perception that it's a snub if they don't meet with the lobbyists" (R7).

Publicly available records provide an idea of the scale of lobbying by AI industry actors; R1 reported that lobbying by industry actors is much greater than lobbying by non-industry actors, and Cheng and Tanglis (2024) finds that 85% of DC lobbyists working on AI-related issues in 2023 were hired by industry organizations. In addition, R15 mentioned that in 2023, 77% of registered meetings on AI taken by high-level European Commission members were with AI industry players (CEO 2024; see CEO 2023 and Field 2024). Disclosures reveal that lobbying on AI issues in the United States increased significantly in 2023 at both the federal level (Ratanpal 2024; Oprysko 2024) and the state level (Bordelon 2023a; Williams 2023). Large AI developers have registered to lobby the federal government (Oprysko 2023) and hired former congressional staff who were involved in crafting key AI policies as lobbyists (see Section 5.2). Notably, many industry players who are supportive of general-purpose AI regulation in public are often much less supportive in private (Henshaw 2024; Perrigo 2023).

Trade associations also engage in advocacy (R15; R16), generally lobbying against any general-purpose AI regulations (R1). Moreover, larger corporations may have more control over trade associations' decision-making, thus expanding their influence on policymakers through these associations (R15; R16; see Johnson 2020). Advocacy by trade associations may give policymakers the impression that particular policies represent an industry consensus. "By far the biggest channel of influence is industry consensus," and perceptions of industry consensus can create an agenda-setting

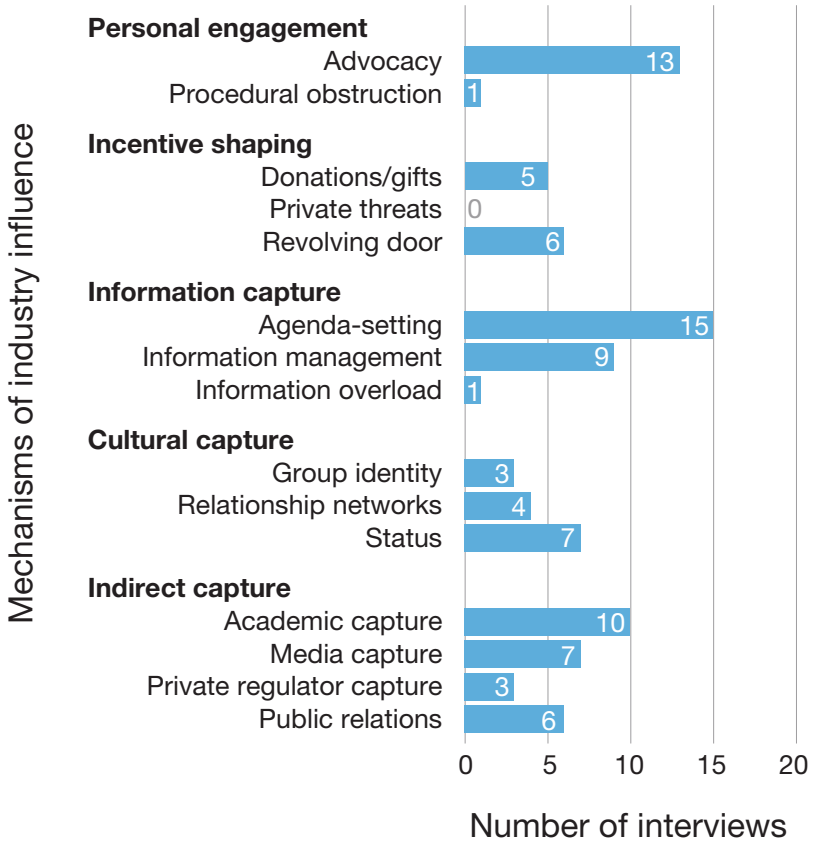

Figure 3: Number of interviews that discussed each mechanism of industry influence in AI policy

effect because "governments are often very deferential to industry" (R7).

Procedural Obstruction. According to our interviews, this mechanism is not widely used by industry to influence general-purpose AI regulation. Only R16 mentioned procedural obstruction, suggesting that some companies could be intentionally delaying or disrupting the work of AI standards-setting bodies.

5.2 Incentive Shaping

Donations and Gifts. Four experts indicated that donations and gifts are currently an important mechanism of industry influence in AI policy,[12] and another noted that this mechanism was not currently dominant but was likely to occur in the future. One interviewee specifically highlighted venture capital firm Andreessen Horowitz's 2023 announcement that it would donate to "support like-minded candidates [who are against 'misguided regulatory policy'] and oppose candidates who aim to kill America's advanced technological future" (Horowitz 2023). That expert reported that many elected officials perceived this statement as opposition to any general-purpose AI regulation.

In addition to monetary donations, gifts can also come in intangible forms, including status or social reputation, such as speaking engagements or other "opportunities that fall below the thresholds of . . . anything that would be captured by [ethics] policies" (R4).

Private Threats. No experts suggested that industry actors are currently using private threats to influence policy.

Revolving Door. The "revolving door" occurs when government staff take on industry employment and industry staff take on government roles. Experts noted that revolving doors are currently pervasive in Congress. Many AI companies have hired lobbying firms with former congressional technology policy staffers to lobby the US government on AI issues (R2; R10; Giorno 2024; Scarcella 2024). This dynamic is likely to intensify once regulations are implemented: Staffers currently working on AI policy would be particularly desirable hires for AI companies because "whoever wrote the first [AI rules] has a lot of networks, has a lot of connections, [and] is highly sought after [by industry]" (R10).

Firms can also hire former staffers as in-house lobbyists. Two experts independently brought up the case of French AI startup Mistral and Cédric O, a former high-level French

[12] A variation on the mechanism of donations and gifts is industry investment in legislators' districts (see, e.g., de Figueiredo and Raiha 2022). These investments were not discussed in our interviews.

official known to be critical of the technology industry but who, after co-founding Mistral, lobbied for a provision in the EU AI Act that would exempt Mistral from regulatory requirements (Bergen, Deutsch, and Berthelot 2023). Another interviewee recalled that the top aide to Senate Majority Leader Chuck Schumer had become a public policy executive with Microsoft (Evers-Hillstrom 2023), which then became the only company to have two representatives attend the first AI Insight Forum organized by that legislator (Miller 2023).

Experts diverged on the extent to which revolving doors are relevant to AI policy, with some experts expressing that it was not currently a major issue (R9; R11). Other interviewees indicated that revolving doors could become an issue once general-purpose AI regulations are enacted. R8 compared the AI industry to the nascent nuclear energy industry in the 1950s, indicating that revolving doors are particularly likely to occur because there are few credible leaders on AI policy who are unaffiliated with industry and who would not seek industry employment after working in government. Similarly, because "the regulatory stakes are so high where a company could . . . be above water or underwater just based [on] how one line of law is interpreted under the agency . . . the revolving door will increase in a way potentially reaching a scale that we see in the defense sector" (R10). Headhunting agencies specializing in hiring former government officials into industry may intensify these dynamics (R4).

Aside from direct employment relationships, industry actors can directly fund roles in government: "[T]here's a number of roles within government that there either is no funding for or requires third party funding to staff" (R4). Companies can help "fill the gap" in funding or even fund new roles (R4; Bordelon 2023b; Thompson 2022a,b).

One example of such roles is industry-funded positions for staffers with technical backgrounds. Companies may genuinely wish to ensure that regulation is functional because badly designed regulation is bad for business (R7) or because they view impending regulation as inevitable. However, adding more technical staff within key decision-making bodies can create agenda-setting effects (see Section 5.3) or militate against stricter regulations: "Congressional offices having additional technical expertise . . . does sometimes at least make it less likely that they will do the most extreme . . . forms of regulation" (R2).

5.3 Information Capture

Agenda-Setting. Experts expressed widespread concern about agenda-setting by AI companies, with one interviewee concluding that "the battle is being fought on the front of agenda-setting" (R10).

AI companies are advancing anti-regulation narratives based on national security or economic competitiveness. In conversations with policymakers, corporate actors regularly claim that general-purpose AI regulation must be avoided so that the United States can win an "AI arms race" with China (R13; Bordelon 2024), argue that AI developers have a special economic or political role that is too important to be interfered with (R8), create dichotomies between safety and innovation (R8; R16), or oppose regulation of open-source models because "open source is an engine of economic growth" (R9). These narratives can frequently be extensions of broader techno-libertarian rhetoric that has existed as far back as the 1990s (R5; R11), such as "the permissionless innovation framework" (R11).

Industry may also steer policy discussions toward particular problems—e.g., by hosting workshops or presentations with policymakers to "frame the question of 'what are the salient harms and risks from AI influence?' " (R17). AI developers can direct attention toward specific use cases and away from others: for R5, an outsized focus on text or image generation allows other uses—e.g., law enforcement, military, or surveillance—to go ignored. Even when large language models are deployed for these functions,

> "[AI companies] sort of toss up their hands and say, 'this [problem or type of use] has nothing to do with us.' And I think that accomplishes two things . . . They avoid a lot of the critiques and also the idea that policymakers would regulate them for that. And I think the dual-use narrative also happens a lot here. That means that, oh, if you're interested in this topic, you should regulate it away from us because that's not our thing." (R5)

In addition, industry can set the policy agenda by promoting default standards or regulatory approaches (R7; R8), which can fail to reflect broader public interest goals (Hacker 2023). Companies have promulgated self-governance practices, such as the Responsible Scaling Policy from Anthropic (2023) and the voluntary commitments on AI from the White House (2023). Experts were concerned that these announcements "essentially set[] the agenda for regulation" (R9) and endeavor to prove to policymakers that "there is some sense of . . . thoughtfulness going into how the technology is being built" (R12).[13] Companies have also pushed for regulation of individual AI use cases rather than direct regulation of general-purpose AI systems (R3; R6; R15).

Another form of agenda-setting occurs when industry actors determine metrics for measuring harm prevention, equity, or system safety. Companies frequently "[cast] demographic diversity in the text and images in the generated content . . . as the holy grail of [AI] ethics, and it's . . . not even close . . . It's not a sliver of the problems being created" (R5). Metrics used are often misleading proxies for the harms they sought to address, which can detract from broader concerns about AI's effects on labor markets, economic inequality, democratic governance of AI systems, and the goal of "shifting power to marginalized communities" (R5).

Moreover, some companies attempt to steer regulatory discussions toward technical or engineering details at the expense of broader policy discussions. Although governments require technical expertise to make effective policy, it may be undesirable for discussions to be overly limited to technical details because

[13] We do not mean to imply that such agenda-setting is always harmful or that companies are not being thoughtful by joining voluntary commitments. Self-regulation can often be beneficial.

> "companies prefer to have fights in the . . . technical weeds . . . [One analogy is] you would be trying to argue with the military on their own terms where you're saying, like, oh, this strategy is going to lead you to capture or not capture this number of things or have this effect. But the military knows way more about all those stats and has way more ability to produce those stats . . . If you're arguing with them about their stats and on their terms, it feels like you're just losing." (R2)

This framing may help advance more-moderate regulations or make enacting regulation more difficult, and it could also exacerbate cultural or informational effects, forcing governments to defer to industry information (Hakenes and Schnabel 2014).[14] It can also sideline civil society groups by reducing "a political policy issue that many groups in society might have a stake in . . . and turning it into that sort of technocratic discipline" (R17).

Information Management. AI companies possess large information asymmetries over government actors, who have limited expertise and visibility into advanced AI systems (Taeihagh 2021; Lupo 2023; Anderljung et al. 2023a). Companies are capitalizing on these asymmetries to shape the information environment in their favor (R1; R2; R3; R11; R14), usually by withholding important information about general-purpose AI systems or about AI development processes. Interviewees gave examples of such "information management", including the lack of information publicly disclosed about OpenAI's GPT-4 compared with previous models, even when contemporary industry norms were to release certain data (R14); the lack of transparency about firms' data collection policies and the contents of training data (R1; R11; see Gallifant et al. 2024); and companies' claims that they were not in possession of information about the labor practices of data suppliers (R5). AI developers could further engage in "stonewalling or slow-walking . . . like lack of forthcomingness to inquiries that make it difficult for government actors to have a full picture of what's going on in an official capacity" (R12).

The flip side of refusing to disclose key information is releasing information that could serve industry goals—e.g., cherry-picked, positive use cases of AI technologies. Although promoting beneficial use of AI is a possible goal of regulation (Figure 1), "industry [is] selectively sharing examples of proactive, responsible use or responsible approaches, which both are intended to demonstrate a reduced need for regulatory intervention or to shape the kind of regulatory imagination of what good practices look like" (R12).

Information Overload. Only one expert discussed information overload, which occurs when actors inundate policymakers with more information than they can assess to lower scrutiny of policy outcomes (Wagner 2009). R6 indicated that many industry actors submitted comments to the National Institute of Standards and Technology (NIST) on the AI Risk Management Framework (NIST 2023), which could be a limited example of this mechanism at play.

[14] On the other hand, technical discussions can benefit the regulatory process, and it may be the case that more moderate regulations are sometimes desirable. It is important, however, to ensure that this framing does not derail public interest goals such as preventing harms from AI technologies.

5.4 Cultural Capture

Group Identity. Interviewees indicated that influence exerted through group identity is limited and largely occurs along partisan lines—e.g., when corporate lobbyists lean on partisan affiliations to push policymakers toward particular policies (R9). At least in Europe, lobbyists are also appealing to national interests in an attempt to obtain more-favorable regulations for local AI companies (R14; R15; Volpicelli 2023). No interviewees suggested that regulators may identify with the AI industry, as Kwak (2013) describes having occurred in the financial industry.

Relationship Networks. Relationship networks are an important channel of influence for professional lobbyists (R1; R8). Corporate executives also leverage personal relationships to advance their policy goals: One particular executive at a major AI company was described as "ha[ving] so many relationships and [is] so extroverted and so personable and so forth, [which] is a key input into why they have more voice on a lot of these debates" (R11).

Status. Seven experts expressed concerns with the more-subtle influence of intellectual status (technical expertise) and social status on policymaking. The epistemic construction of technical expertise in particular has been a battleground for AI companies in seeking to influence policy (R4; Bode and Huelss 2023). Company executives who oppose general-purpose AI regulation frequently disparage non-industry experts as "old" and outdated (R7). On the other hand, these industry players tend to promote "the builders [who these players claim] understand what it takes to actually build stuff" and who they claim are "not worried about [risks from AI] because [the builders] really understand how AI works. Once you're a technical engineer, and you really understand this stuff, you'd understand that you shouldn't be afraid of [AI]" (R7). Furthermore, anchoring expertise to industry employment furthermore allows companies to promote the views of "big-wig influencer[s] within an AI sphere" who may not have technical understanding of AI systems (R5; Goanta et al. 2023).[15]

Executives of AI companies are also viewed as having high social status, which makes policymakers more favorable to their views (R16). Specifically, elected officials may seek to mirror industry executives' views because they seek proximity "with the cool tech CEO" (R16) or because they see the "zeitgeist of AI being important right now" (R1).

[15] Industry experts often *do* have real expertise. R2 described a congressional hearing at which "we had some people come from [a cryptocurrency exchange], and they hired a bunch of former senior [executive branch] officials who worked on preventing cybercrime . . . And they are giving you a mix of genuinely helpful information that they are gaining as someone with their genuine expertise, mixed in with things that fit the company's goals."

5.5 Indirect Capture

Academia. Experts most frequently discussed academia as a target of indirect capture. Industry funding of academic labs or research centers can shape research agendas and directions (R5; R17; Jiang et al. 2023; Tafani 2022; Cath and Keyes 2022; Himmelreich and Lim 2022; Weinkle 2019). Direct institutional funding can help industry actors generate positive publicity, shape conversations, and influence decisions at universities and at major academic AI conferences (Abdalla and Abdalla 2021). Academic researchers are often dependent on collaborations with industry because academic institutions lack the large-scale computing resources needed for research into large models (Ahmed and Wahed 2020; Whittaker 2021), which can result in "research that would be useful to the player that has that infrastructure rather than purely exploratory research" (R12; Widder, West, and Whittaker 2023; Abdalla et al. 2023). R13 noted that these dynamics combine to create academic and "employment structures [that] incentivize a certain kind of belief system" and prevent academic institutions from effectively training technologists to consider downstream harms of AI.

Additionally, industry organizations can support "people who genuinely have ideological commitments that happen to line up with theirs, rather than paying them to change their view" (R2). For instance, companies can promote academic researchers who share their views by inviting them to serve on advisory boards, endowing professorships, funding teaching buyouts, or starting partnerships with universities (R4; R9; R17). Providing these incentives can advantage industry views even where the independence of academic research is not compromised.

Industry ties are pervasive even among researchers who study the ethics and social effects of AI (Cath and Keyes 2022; Young, Katell, and Krafft 2022). R5 recalled:

> "I was at FAccT [the Association of Computing Machinery (ACM) Conference on Fairness, Accountability, and Transparency] once, and I was in this circle of people . . . [who are] very critical of corporate influence, and I asked this small circle I was standing in how many of them had ever been affiliated with DeepMind, and it was [a large percentage] of people in the circle."

Interviewees also indicated that similar dynamics could occur in think tanks as in academia (R4; R7; R17).

Media Capture. Many interviewees expressed that media capture is occurring (see also Brennen, Howard, and Nielsen 2018; Barakat 2024). Companies often pay for sponsored content (R12; e.g., Wang 2023) or co-host high-profile media events (R14; e.g., Politico 2024). Media staff may also become culturally captured by industry through relationship networks or status (R4; R5; R14). These concerns, however, were tempered by the observation that many outlets can be "super anti-tech" (R1; R2).

Private Regulator Capture. Private bodies that serve regulatory functions can be captured in much the same way as government institutions. The structure of the current auditor and model evaluator landscape raises questions about the independence of AI assessments (Raji, Costanza-Chock, and Buolamwini 2023). Auditors may not be sufficiently independent or could have perverse incentives that impair the integrity or validity of assessment results (R3; Manheim et al. 2024). AI auditors are also vulnerable to cultural capture—as was common in the financial industry during the run-up to 2008 (Kwak 2013)—because "they're being invited [to] or speaking at some of the same events, AI policy, AI standards, events [where] industry actors . . . are. So certainly I think a bit of indirect influence is happening" (R6).

Private standards-setting bodies can be subject to capture as well (R3; R6). Industry actors are generally well resourced and better positioned to engage in standards-setting processes (R6; SRI 2023), and over-representation of industry on standards-setting bodies could help facilitate capture (R14).[16] Companies can also hinder standards-setting work by engaging in procedural obstruction (R16). Overall, these interactions can result in the creation of standards that are particularly partial to industry (Gornet 2023; Tartaro 2023a,b; Ebers 2022).

Public Relations. Industry players attempt to influence policymakers by shifting public opinion. Though interviewees were unable to specify the extent to which these methods were effective, several discussed specific public relations campaigns. One expert mentioned a trade association's $25 million expenditure on an ad campaign detailing positive AI use cases (R10; TechNet 2024), and another was concerned that AI companies may adopt practices from other parts of the technology industry of sending "direct calls to action to customers, . . . like Uber, sending notifications directly to users" (R11; Stempeck 2015).

6 Mitigating or Preventing Regulatory Capture in AI Policy

Drawing on our interviews and on the social science literature, we preliminarily discuss below mitigation measures for different influence mechanisms. Overall, systemic changes are needed to build an AI governance ecosystem that aligns AI development and deployment with the public interest. One urgent need is to build governance capacity for AI within government and civil society (see Reuel et al. 2024)—ensuring that government, academia, private regulators, and other organizations receive sufficient funding and talent will be crucial both to resisting capture in the overall ecosystem as well as to combating informational capture. For instance, R12 pointed at "public [AI] infrastructure and investments" a significant intervention, and full funding for NIST could help build technical capacity in government (Gastfriend 2024) and thereby reduce reliance on industry expertise.

[16] Similarly, industry over-representation on advisory councils could facilitate capture (R14; Vasse'i 2019; Schäferling 2023; see also, e.g., DHS 2024). See Westgarth et al. (2022) for a different view.

Procedural and institutional safeguards may also contribute to aligning AI with the public interest. The literature frequently discusses the importance of such mechanisms as watchdogs (Caprio 2013), independent review of regulatory rules (Livermore and Revesz 2013), and appointed advisory boards or public advocates (Wagner 2009; Cuéllar 2013; Schlanger 2014; Baxter 2012). Interviewees were also supportive of participatory processes such as notice-and-comment,[17] which could help increase policy access for individual and civil society actors.

Specific mechanisms of industry influence may also be addressed via targeted measures, and we discuss below some of these interventions. Increased transparency and robust civil society institutions may be generally useful for combating mechanisms such as advocacy, donations and gifts, and indirect capture through public relations or media capture (R6; R9; Baxter 2012; Anderljung et al. 2023b; Hirsch and Shotts 2018). R16 suggested, for instance, that requiring disclosures of lobbyist meetings with legislators and policymakers may be slightly but not very effective. R9 described having attended "dinners where gifting limits were stretched to their broadest definition," and forcing disclosure of these types of events and expenditures could increase accountability for both corporate and government actors. Most experts were pessimistic about the sufficiency of transparency requirements in curbing industry influence, though R10 pointed at the Lobbying Disclosure Act and the Foreign Agents Registration Act as examples of effective, strictly enforced transparency requirements. Generally, however, the ability to capture policy through advocacy, donations and gifts, or indirect capture may reflect systemic weaknesses in US societal structures (Mitnick 2011); targeted interventions to address these mechanisms may run into legal barriers (Killion 2023).

Revolving doors can be addressed through more robust (enforcement of) ethics requirements limiting post-government employment (Kwak 2013). Government "conflicts [of interest] reviews that are more straightforward in other legacy fields [are] not as rigorous for both AI and tech more generally" because ethics offices often do not have AI "industry knowledge and [familiarity with] the variety of roles that can exist in different types of companies" (R4). Offices managing these types of reviews might benefit from additional funding and from AI industry-specific training. Interventions such as these, however, which limit personnel transfers between government and industry, must be balanced with governments' needs to be aware of industry developments and to possess top technical expertise. Another intervention for revolving doors could be to make government careers relatively more desirable by investing in regulator salaries, work environments, and professional development (Mitnick 2015; Hempling 2014).

Information capture can be addressed through giving non-industry stakeholders greater access to the policy process. In particular, "the very early stage" before legislative proposals have been drawn up "is potentially the most important because it fixes what [a draft] law looks like. So the framing is quite important, . . . and the most powerful industry stakeholders could be more involved in that process" (R15; see Khanal, Zhang, and Taeihagh 2024). To address this issue, consumer empowerment programs could help enable civic participation in AI policy (Schwarcz 2013). Reporting and monitoring requirements could also mitigate agenda-setting and information management by increasing regulatory visibility and verifying industry information (Rubinstein Reiss 2012). At the same time, however, stakeholder engagement can also slow down the policy process. Given the pace of AI development, additional research may be needed to find new methods to enable participation without unduly slowing down AI policy.

In contrast with other mechanisms of influence, many interviewees suggested that targeted interventions for cultural capture were largely intractable (e.g., R11). Some potential solutions are ensuring that policymakers come from diverse backgrounds (Kwak 2013), changing agency cultures (Hempling 2014), and increasing policymaker awareness of cultural capture mechanisms so that policymakers can be on guard against these mechanisms (R6).

Finally, academic capture has been relatively well-studied in the context of AI (Abdalla et al. 2023; Abdalla and Abdalla 2021; Rikap 2024). Analogous to revolving doors in government, evening the playing field for non-industry academics would mitigate academic capture—e.g., through increasing non-industry career opportunities and ensuring access to compute and data resources (Zingales 2013; Egan and Milana 2023; Besiroglu et al. 2024). Independent funding sources can also alleviate industry control over universities and think tanks (R17), as well as over private regulators such as auditors (R6).

7 Limitations

This work is highly contextual and subject to a number of limitations. Methodologically, our interview sampling method was not random, which could affect sample representativeness and result validity. Our instrument was also descriptive and targeted toward uncovering *current* industry practices in influencing general-purpose AI policy; influence dynamics may change over time as regulations are implemented or updated.

Our scope is also limited: We examine only US policy, general-purpose AI regulation, and adverse policy influence exerted by corporate actors. Our results may not generalize outside these contexts; regulatory capture in international institutions or other jurisdictions (see, e.g., Lall 2009; Young, Katell, and Krafft 2022), or relating to other types of AI systems, may take on very different forms. Furthermore, while corporate actors tend to dominate the US policymaking process, other special interests can also exert policy influence in ways distinct from industry (e.g., Ahmed et al. 2023). We also excluded consideration of ways in which industry influence could be net beneficial for the public.

[17] Notice and comment is an administrative procedure in the United States used by federal agencies when setting regulation. During the notice-and-comment process, an agency announces a potential regulation to the public, solicits public comments on a draft rule, and then promulgates a final rule and responds to those comments (Garvey 2017).

Finally, our discussion of solutions to regulatory capture is preliminary and intended only to suggest directions for future research. Models of capture differ widely depending on the actors involved and the types of government policy at hand. Further research is needed to identify targeted institutional changes that would address context-specific models of capture in general-purpose AI regulation.

8 Conclusion

Industry influence in AI governance can harm consumers and decrease social welfare through regulatory capture. Capture occurs when companies steer policy processes or dynamics to create an industry-leaning regulatory environment—causing, e.g., policymakers to under-regulate unsafe, opaque, or inequitable AI systems. Our findings suggest that AI developers, deployers, trade associations, and other industry actors are attempting to achieve captured outcomes most often through mechanisms of agenda-setting, advocacy, academic capture, and information management.

These channels of influence operate in heterogeneous ways and can lead to a variety of undesirable outcomes. Researchers should understand the various models of capture and the goals of different actors, and additional work is needed to identify workable solutions to these different models. Although not all industry participation in AI policy is problematic, policymakers must be on guard against both more-conspicuous and subtler forms of corporate influence in order to prevent capture.

Ethical Considerations Statement

This study was reviewed by the Human Subjects Protection Committee at RAND (HSPC ID: 2023-N0581) and was determined to be exempt from further review. The interviewers obtained written informed consent forms from all interviewees prior to their participation in this study, as well as verbal consent to record interviews prior to the start of each interview (interviews were not recorded when interviewees declined to be recorded). The authors conducted interviews via secure platforms, took steps to securely store and transmit study data, and generally followed best practices in protecting the confidentiality of interviewees and in de-identifying interview data (Saunders, Kitzinger, and Kitzinger 2015; Stam and Diaz 2023). AI assistance was used in the form of a private OpenAI Whisper instance hosted by RAND to transcribe interview recordings where applicable; at no point were interview recordings or other identifiable data input to other AI systems. At the time of this writing, the authors have deleted all identifiable project data.

Adverse Impacts Statement

The broader impact of this research is generally expected to be positive, but a project on industry influence and regulatory capture in AI policy also has risks.

First, there is a risk that by focusing on regulatory capture, this article overly emphasizes in the policy conversation the pitfalls of industry participation in the policy process. We emphasize that industry players have an important role in regulation and in AI policy, and it is important for policymakers to balance that role with the potential of regulatory capture.

Second, there is a risk that readers may conclude that AI policy has already been captured in the United States, thus justifying undesirable policy corrections or other measures. We do not claim in this article that US AI policy has already been captured, and we caution against calls to this effect because of the difficulty of measuring capture and the heterogeneity of possible policy goals for AI regulation.

Third, there is a risk that readers may conclude that capture is inevitable, and perhaps relatedly that all AI regulation is doomed to fail. We do not claim in this article that capture is inevitable in US AI policy, nor do we believe that all AI regulation will inexorably be entangled by capture dynamics. We believe that it would be unreasonable to infer such claims from this article.

Fourth, there is a risk that our work may be interpreted as predictive of regulatory capture dynamics in the future—e.g., after the regulatory and governance environments have matured. We emphasize that our research is meant to identify trends in influence and to outline possibilities of capture at the current point in time in the United States; we do not make predictive claims about influence and capture dynamics in the future or after significant changes in the regulatory and governance landscapes.

Finally, there is a risk that by thoroughly examining the ways in which industry actors can influence policy, this article paradoxically *increases* the risk of capture by highlighting for AI industry actors some strategies of influencing policy that have been used to great effect in other industries. Although this risk may be real, we hope that by documenting these strategies, we are able to provide clarity and raise awareness among policymakers and researchers such that future AI policy may be designed to guard against undue or harmful industry influence.

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A Appendix: Interview Protocol

This appendix contains our interview instrument. All interviews were conducted by the first author.

We first set forth a definition of "AI policy" and "general-purpose AI systems"[18] for all interviewees:

> "One quick note before we begin: In this interview, we will be discussing AI policy. We are primarily interested in general-purpose AI systems that have a wide variety of use cases, rather than narrow or domain-specific AI systems. By 'AI policy,' we mean government policies intended to regulate, restrict, or promote the development and deployment of general-purpose AI systems. Does that make sense to you?"

Our interview instrument then contained four components: one question on the interviewee's background, questions to help identify outcomes of industry influence in AI policy, questions on mechanisms used by industry actors to influence AI policy, and one open-ended question. The interviews were semi-structured, so follow-ups were asked as necessary.

We began with one question concerning interviewees' backgrounds:

1. Can you tell me what your job and job description is? What areas of policy are you responsible for?

We then ask a set of questions concerning the industry goals in AI policy:

2. Briefly, how would you define the public interest goals of regulation of AI?
3. Briefly, what actors or types of actors from industry currently contribute to the design, development, or enforcement of AI policy?
4. In general, what goals do industry actors have when they attempt to shape AI policy? In particular, what types of changes do they propose for regulation, and do these changes tend to interact with the public interest goals of [goals identified in Q2]?

We then presented interviewees with a version of Table 2.[19] We asked a set of questions about mechanisms of industry influence in AI policy:

6. In this table, we have identified a list of different mechanisms for how industry can influence policymaking in different sectors. Do you have any questions about any of the mechanisms, or can we provide any examples to make these more clear for you?
   (a) Please describe any mechanisms for industry influence in policy that are missing from this table.
7. Which of the mechanisms listed in Table [2] are currently most relevant to AI policy, to your knowledge? These could be mechanisms that industry is currently using or likely to use in the future to influence policy.
8. [For each of the mechanisms identified in Q6] For [mechanism], do industry actors currently use this mechanism to influence policy to your knowledge, or is it not currently used but likely to be used in the future?
9. [For mechanisms currently used to influence policy]
   (a) Have you personally seen [mechanism] in action?
   (b) Can you give us a few examples of when you have seen this occur?
   (c) What procedures or mechanisms are currently in place that would prevent industry influence on policymakers through [mechanism]?
   (d) To the best of your knowledge, are these preventative procedures are currently effective? Why or why not?
10. [For mechanisms likely to be used to influence policy in the future]
    (a) What features of the AI industry or of current AI policymaking make [mechanism] likely to be used in the future?
    (b) Are there any industries in which you have seen [mechanism] occur that inform why [mechanism] may occur in AI?
    (c) What procedures or mechanisms are currently in place that would prevent industry influence on policymakers through [mechanism]?
    (d) To the best of your knowledge, are these preventative procedures currently effective? Why or why not?

Finally, we concluded with an open-ended question:

11. Is there anything that we did not discuss that you would like to mention?

[18] See also EU AI Act, Art. 3(63); Gutierrez et al. (2023); Triguero et al. (2024); Xia et al. (2024) for additional commentary and definitions of "general-purpose AI."

[19] This table was adapted throughout our interview process with new examples, clarifications, and mechanisms based on previous interviewee questions and suggestions.

B Appendix: Literature Review

B.1 Methods

We conducted a limited scoping review of the academic literature that discussed regulatory capture in the context of AI policy. Our review was used to give us an overview of the literature, to inform Section 2, to develop examples and talking points for interviews, and to corroborate interview findings where applicable. It is not our main contribution and is not as rigorous as might be expected from a systematic review.

Using the search terms in Table 5, we queried the ACM Digital Library, IEEE Xplore, arXiv,[20] and Google Scholar for articles containing terms in Table 5. Searches were conducted in October 2023 and again in January–February 2024. Both articles in the academic and gray literature were included.

The search string was constructed to return any article that contained an exact match of (any) one term from *both* columns in Table 5. In other words, articles needed to contain one term related to AI policy and one term related to regulatory capture. All searches were full text, so the terms could be contained anywhere in the text of the article or in any metadata field (e.g., title, abstract).

AI Governance Keywords	Capture Keywords
"artificial intelligence"	"regulatory capture"
"AI governance"	"industry capture"
"AI policy"	"agency capture"
"AI ethics"	"corporate capture"

Table 5: Search terms for scoping review

The search returned $n = 255$ unique articles in the English language. The second author filtered these results by reading the titles and abstracts of all articles. Filtering was conducted using the inclusion and exclusion criteria in Tables 6 and 7.

Inclusion Criteria
The article describes influence related to AI policy or regulation
The article describes influence exerted on policymakers, or on an entity that may influence policymakers

Table 6: Inclusion criteria for scoping review

A list of the articles remaining after filtering based on the inclusion and exclusion criteria may be found in Table 8. Note that our method led us to be over-inclusive about which articles remained in the final review. As long as *any part of the text* satisfied the inclusion criteria, we included the article in our final review. Oftentimes, the included articles contained only a few sentences to a paragraph of relevant discussion.

[20] Although preprints on arXiv are not peer reviewed, a not-insignificant proportion of academic literature appears on arXiv before formal publication, as do various articles in the gray literature, e.g., reports by think tanks or advocacy institutions.

Exclusion Criteria
The article only discusses influence by non-industry or non-corporate actors
The article includes neither a mechanism nor a concrete outcome of capture
The article is a thesis or dissertation

Table 7: Exclusion criteria for scoping review

Based on the article text, the second author then coded each article based on the mechanism of influence discussed in that article (either explicitly or—more often—inferred from the text).[21]

B.2 Results

A brief overview of our results is below. Generally, most articles' research questions were not centered on industry influence or regulatory capture. Most often, the relevant portions of the text were extremely brief and situated as warnings against capture in the context of broader policy proposals or discussions; most articles did not discuss specific mechanisms of influence in depth. Thus, we do not believe that the number of articles in our review or our results below are particularly indicative of the maturity of the research into industry influence in AI policy.

Of the included articles ($n = 120$), the most frequently discussed types of mechanisms are information capture ($n = 57$), indirect mechanisms ($n = 46$), and personal engagement ($n = 25$). Discussion of information capture was divided mostly between information management ($n = 29$) and agenda-setting ($n = 27$). Discussion of indirect mechanisms for capture were limited to private regulator capture ($n = 29$) and academic capture ($n = 17$). Most articles coded as personal engagement discussed advocacy ($n = 25$).

Incentive shaping ($n = 12$) and cultural capture ($n = 11$) are discussed relatively less frequently. The majority of articles about incentive shaping discussed the revolving door phenomenon ($n = 8$), with only half as many articles discussing donations and gifts ($n = 4$). Discussion of cultural capture was split mostly between group identity ($n = 5$) and relationship networks ($n = 5$), with only one article about status ($n = 1$).

[21] Since the primary research questions of the vast majority of these articles were not about regulatory capture or industry influence, we generally screened only the relevant parts of the text instead of the full text of every article (see Section B.2).

	Articles
Included ($n = 120$)	Abdu, Pasquetto, and Jacobs (2023); Abebe et al. (2022); AI Governance Alliance (2024); Alaga and Schuett (2023); Allen (2019); Almada and Petit (2023); Anderljung et al. (2023a); Attard-Frost and Widder (2023); Badran (2021); Bajohr (2023); Bannerman et al. (2020); Bender and Grimsson II (2024); Berman, Goyal, and Madaio (2024); Bova, Stefano, and Han (2024); Brandusescu (2021); Broughel (2023); Browne, Drage, and McInerney (2024); Brynjolfsson and Ng (2023); Bryson and Malikova (2021); Bryson (2020); Casper et al. (2024); Cath and Keyes (2022); Chan et al. (2024); Chan, Bradley, and Rajkumar (2023); Chesterman (2021b); Chilson and Rinehart (2024); Chomanski (2021); Cihon, Maas, and Kemp (2020a,b); Clarke and Whittlestone (2022); Cui et al. (2024); de Laat (2021); Vries, Kanevskaia, and Jager (2023); Dempsey et al. (2024); Derczynski et al. (2023); Dickens (2021); Ebers (2022); Egan and Heim (2023); Erman and Furendal (2024); Evans et al. (2021); Fagleman, Griffiths, and Mcateer (2023); Frazier (2023); Friedman et al. (2022); Gaske (2023b); Gazendam and Dawson (2023); Gilbert et al. (2022); Giraudo, Fosch-Villaronga, and Malgieri (2023); Goanta et al. (2023); Gornet (2023); Greenleaf, Clarke, and Lindsay (2019); Guha et al. (2024); Guihot, Matthew, and Suzor (2017); Haataja and Bryson (2022); Hacker (2023); Hadfield and Clark (2023); Himmelreich and Lim (2022); Hu (2021); Hua and Belfield (2023); Jiang et al. (2023); Jing, Berger, and Becerra Sandoval (2023); Katyal (2022); Khan (2023); Koene et al. (2019); Kolt (2023); Lam et al. (2024); Laux, Wachter, and Mittelstadt (2021); Leslie et al. (2022); Lévesque (2021); Liesenfeld, Lopez, and Dingemanse (2023); Luetz (2023); Lupo (2023); Marcus (2023a); Margulies (2023); Mügge (2023); Narayanan and Tan (2023); Nemitz (2023); O'Shaughnessy et al. (2023); Ochigame (2019); Papyshev and Yarime (2022); Paul (2022); Peng, Lin, and Streinz (2021); Pizzi, Romanoff, and Engelhardt (2020); Png (2022); Raji, Costanza-Chock, and Buolamwini (2023); Ramdas (2022); Roberts et al. (2021, 2023); Sanchez-Graells (2024b, 2023d,c,a,b); Sarel (2023); Schäferling (2023); SRI (2023); Seger et al. (2023); Selbst (2021); Solow-Niederman (2019); Straub et al. (2023); Stuurman and Lachaud (2022); Taeihagh (2021); Tafani (2022); Tartaro (2023a,b); Taylor and Dencik (2020); Thönnes et al. (2023); Timcke (2023); Trager et al. (2023); Veale (2020); Veale, Matus, and Gorwa (2023); Vipra and Korinek (2023); Weil (2024); Westgarth et al. (2022); Whittaker (2021); Widder, West, and Whittaker (2023); Won (2021); Wörsdörfer (2023); Wouters (2022); Vallor (2022); Young, Katell, and Krafft (2022)
Excluded ($n = 135$)	Abdalla et al. (2023); Abou-Zeid, Bayingana, and Amazouz (2022); Ajena et al. (2022); Barabas (2023); Baumberger (2023); Bechara et al. (2021); Bedford et al. (2022); Bennett (2023); Bietti (2023); Boffel (2023); Brandusescu and Sieber (2023); Bremmer and Suleyman (2023); Brownsword (2019); Carlizzi and Quattrone (2023); Carter (2023); Cebulla (2023); Chan, Papyshev, and Yarime (2022); Charisi and Dignum (2024); Charlesworth (2021); Charlesworth et al. (2023); Chauhan (2023); Chesterman (2021a, 2023); Chinen (2023); Cohen and Jackson (2019); Correa et al. (2023); Couldry and Mejias (2019); Critch and Russell (2023); Cuéllar and Huq (2022); Dancy and Workman (2023); Edwards (2022); Eliot and Murakami Wood (2022); Fahey (2022b,a); Fenwick and Vermeulen (2020a,b, 2021); Findlay and Seah (2020); Findlay et al. (2022); Findlay, Seah, and Wong (2023); Ford and Clifford (2021); Fraser and Bello y Villarino (2023); Gans (2024); Gantzias (2021); Gaske (2023a); Gegenhuber et al. (2022); Geiger et al. (2023); Gilbert (2021); Goodlad (2023); Goodman, Gerstel, and Risberg (2019); Gottardo (2023); Gurumurthy and Bharthur (2019); Hacohen (2022); Hawking (2021); Hermstrüwer and Langenbach (2023); Hilty, Hoffmann, and Scheuerer (2020); Himmelreich (2023); Ho, Marcus, and Ray (2021); Huang and Ma (2023); Iliadis and Ford (2023); Ilie and Welch (2014); Kaplan (2008); Keller and Magalhães (2023); Killian (2021); Klaessig (2021); Kleizen (2020); Knaack (2022); Konya et al. (2023); Kuźniacki et al. (2022); Larsen (2022); Lee, Hilty, and Liu (2021); Lie (2023); Lin and Jackson (2023); London and Danks (2018); McGraw and Mandl (2021); McInerney and Drage (2024); Meghani (2021); Mehmood, Naseer, and Chen (2024); Meßmer and Degeling (2023); Moberg and Gill-Pedro (2024); Moitra et al. (2022); Neudert (2023); Neumann (2018); Neves (2023); Olteanu et al. (2023); Ong (2024); Opoku (2019); Outeda and Cacheda (2023); Pacione and Teixeira (2023); Papyshev and Yarime (2023); Pavel et al. (2022); Pavlopoulou (2022); Plantinga et al. (2024); Polishchuk (2023); Rainie, Anderson, and Vogels (2021); Rawat, Prerna, and Singh (2024); Ren (2022); Roberts et al. (2023); Sanchez-Graells (2024a); Sandoval et al. (2023); Sastry et al. (2024); Sengupta (2022); Scherz (2024); Shneiderman (2020); Shrier and Pentland (2022); Sifat (2023); Sitaraman and Eyre (2023); Sivan-Sevilla and Sharvit (2021); Southgate et al. (2019); Southgate (2021); Stahl et al. (2022); Steed and Acquisti (2024); Stix and Maas (2021); Stockbauer (2021); Sun and Guo (2013); Tambini (2021, 2023); Taylor (2021); Thierer and Haaland (2021); Timmers (2021); Turner (2019, 2018); van der Merwe and Al Achkar (2022); Varoglu, Gokten, and Ozdogan (2021); Verma (2023); Vescent and Blakley (2018); Viljoen (2021); Wedam (2023); Widder et al. (2023); Xenidis (2024); Yaghmai (2021); Yang et al. (2024); Zhang, Ong, and Findlay (2023); Zumbansen (2022, 2023)

Table 8: A complete list of the 255 articles resulting from our search, including the final 120 articles in our review