Before the
International Trade Administration at the Department of Commerce
Washington, D.C.

In re	Docket No. 251023-0165
American AI Exports Program	

COMMENTS OF
THE COMPUTER & COMMUNICATIONS INDUSTRY ASSOCIATION (CCIA)

In response to the International Trade Administration's request for information on the American AI Exports Program, published in the Federal Register at 90 Fed. Reg. 48,726 (Oct. 28, 2025),[1] the Computer & Communications Industry Association ("CCIA")[2] submits the following comments.

I. Respondent Background

CCIA is an international, not-for-profit trade association representing a broad cross-section of communications and technology firms. For over fifty years, CCIA has championed open markets, open systems, and open networks. CCIA's members are global leaders in research and development across technological fields such as AI and machine learning, semiconductor design and manufacturing, and other computer-related innovations. Many foundational advances in modern AI have originated from these companies, including the creation of transformer models by Google and the development and open-sourcing of deep learning frameworks such as Meta's PyTorch and Google's TensorFlow.

CCIA member companies form a robust innovation base rooted in the United States. Collectively, they employ over 1.6 million workers domestically and invest more than US$100 billion annually in research and development. With total U.S. business R&D exceeding US$600 billion in recent years, these members represent a major component of that national innovation engine. Most of these firms are headquartered in the United States, contributing to the country's

[1] International Trade Administration. (2025, October 28). *American AI Exports Program*. Federal Register. https://www.federalregister.gov/documents/2025/10/28/2025-19674/american-ai-exports-program.
[2] For more, visit ccianet.org.

position as the global leader in private AI investment, reaching US$109.1 billion in 2024,[3] far outpacing any other nation. This leadership is reinforced by U.S.-based innovation infrastructure: the U.S. currently controls approximately 74% of global high-end AI supercomputing capacity,[4] which supports key breakthroughs in AI. Member companies produce a wide array of AI-enabled products, many of which are developed and manufactured in the United States. These include both goods, such as semiconductors, servers, and end-user devices, and services, including cloud computing, data processing, cybersecurity, software development, digital communications, and other knowledge-based services that form the backbone of modern AI ecosystems.

This innovation and production base not only drives U.S. technological leadership but also underpins the nation's global strength in AI-enabled digital exports. In 2024, the U.S. exported US$729.7 billion in digitally deliverable services, yielding a US$282 billion trade surplus,[5] a significant share of which is attributable to CCIA members. AI increasingly underpins these exports, powering functions such as search, recommendation systems, e-commerce, customer service automation, translation, marketing, and R&D optimization. As AI becomes integral to virtually all digital services, the connection between digital trade and AI leadership has deepened, reinforced by U.S. strengths in cloud and data infrastructure. Collectively, these capabilities position the United States as the leading exporter of AI-enabled goods and services, with member companies exemplifying how U.S. digital service exports collectively sustain America's technological and competitive edge.

The American AI Exports Program (the Program) presents a critical opportunity to support U.S. firms by providing targeted assistance to address regulatory barriers in key foreign markets. The Program should focus on a diverse set of priority markets, including trusted, advanced digital economies such as the EU, United Kingdom, Japan, Taiwan, and South Korea, high-growth regional hubs like Singapore, the UAE, and Malaysia, and emerging markets in Africa and the Americas that demonstrate AI readiness and commitment to addressing regulatory

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[3] Stanford Institute for Human-Centered Artificial Intelligence. (2025). *The 2025 AI Index Report*. https://hai.stanford.edu/ai-index/2025-ai-index-report.

[4] Haag, A. (2025, October 5). *The State of AI Competition in Advanced Economies*. FEDS Notes. https://www.federalreserve.gov/econres/notes/feds-notes/the-state-of-ai-competition-in-advanced-economies-20251006.html.

[5] U.S. Bureau of Economic Analysis. (2025, July 3). *U.S. Trade in ICT Services and Digitally Deliverable Services, by Country or Affiliation*. BEA Data. https://apps.bea.gov/iTable/?reqid=62&step=6&isuri=1&tablelist=359&product=4.

barriers. Across these markets, assistance from the U.S. government to address barriers to digital trade will be critical to help U.S. exporters scale AI deployments.

II. The AI Tech Stack

A. Defining the AI Tech Stack

E.O. 14320's definition of the "full-stack AI technology package" should remain expansive enough to encompass the full operational ecosystem of AI, as the commercial and strategic value of AI is not determined solely by who trains the largest models, but by who can effectively deploy and update both models and related applications across global markets. The definition of the AI stack should therefore explicitly include both the service and device layers. First, the service layer provides APIs and managed services that enable developers to integrate advanced AI capabilities into their applications without managing underlying models or infrastructure. These offerings deliver scalable, production-ready access to AI models and tools, accelerating development and deployment while expanding access to state-of-the-art AI capabilities for organizations of all sizes. Second, the device layer includes AI-enabled and -embedded devices (such as smartphones, industrial sensors, logistics tools, robotics, connected vehicles, edge AI devices, and AI PCs) that serve as the primary interface between AI systems and end users. These devices are where AI becomes economically productive while also serving as critical feedback mechanisms, generating data that continually improves AI systems.

B. Evaluating the AI Tech Stack in Program Proposals

The ITA should use a consistent framework to evaluate each component of the AI technology stack. First, proposals should be evaluated on the extent to which each component strengthens interoperability across the AI stack. Interoperability allows U.S. technologies to fit more readily within varied environments. Technologies that function effectively across these contexts are more likely to support consistent deployment and remain adaptable as market conditions evolve. Prioritizing architectures that promote compatibility rather than fragmentation will help ensure that U.S. firms can achieve broader, more durable adoption in diverse global markets. Moreover, approaches that preserve this degree of autonomy help reduce the risk of dependence on any single provider and create conditions under which systems can be sustained and improved over time. Systems should empower end users to retain, to the extent feasible, autonomy over data, configurations, and deployment decisions, avoiding unnecessary vendor

lock-in. Second, each component should be evaluated for its capacity to operate across and integrate multiple data modalities. This adaptability enables U.S. AI systems to serve a broad spectrum of sector-specific needs, from industrial applications to public-sector deployments, without requiring extensive customization. Emphasizing multimodal functionality therefore supports more consistent, scalable adoption. Third, evaluation should prioritize components that demonstrate strong cybersecurity protections. Favoring architectures that are widely recognized as trustworthy not only strengthens overall resilience but also underscores a comparative advantage of U.S. technologies in global markets, where assurances of security and reliability are central to adoption.

III. Consortia Membership and Formation

A. Guidance on Consortia Formation

Regarding consortia formation, the Program should provide guidance that incentivizes flexibility rather than mandating rigid consortium structures. AI partnerships naturally vary by use case and geography; therefore, imposing a uniform model would constrain participation. Business models and service priorities vary across companies, many of which are fierce competitors, a heterogeneity that underpins the U.S.' comparative advantage in the AI stack. The Program should allow both formal consortia and ad hoc, project-based partnerships that can adapt to specific market needs. ITA should also permit individual firms to participate independently when they can credibly demonstrate the capability to deliver or integrate all components of the full-stack AI definition. This approach reflects how leading U.S. firms already operate globally, forming fluid alliances across different layers of the AI stack. Allowing individual participation would simplify administration and avoid forcing companies into redundant groupings. Where formal consortia are established, the Program should provide clear expectations regarding liability distribution and reporting requirements.

B. Consortia Membership and Composition

For cases where formal consortia are established, the Program should emphasize clear and flexible criteria for participation and oversight that reflect the evolving nature of the full-stack AI ecosystem. First, eligibility should rest on a consortium's demonstrable capabilities across one or more components of the full-stack AI definition. Members must contribute

meaningfully to delivering export-ready AI systems, with U.S. firms or their affiliates maintaining a significant role in compliance oversight. Second, the Program should explicitly support modularity. Allowing providers to participate at specific layers, such as compute, cloud, or applications, without being locked into fixed configurations would preserve market agility, promote competition, and enable the Program to leverage best-in-class capabilities across the ecosystem. Third, the Program should anticipate periodic adjustments to consortium membership as technologies evolve and market dynamics shift. A streamlined process for modifications, such as annual or semiannual review, would maintain adaptability. Any changes should trigger reassessment only of the relevant compliance and operational criteria, rather than forcing full requalification of the entire consortium.

C. Role of Foreign Entities

The Program should allow foreign companies to participate in consortia when they are headquartered in or substantially operate within trusted partner nations that share U.S. commitments to security and the rule of law. Participation should be contingent on compliance with U.S. export control laws. Allowing trusted foreign companies, particularly those in allied countries, to participate is key to enhancing the competitiveness of U.S.-led AI exports, helping form a high-integrity alternative to competitor ecosystems. Foreign entities should be involved through clearly defined partnership channels, such as subcontracting, joint ventures, or technical integration, under U.S.-led governance. Flexibility should be preserved to allow consortia to adapt partnerships to specific regional deployment needs, consistent with the modular, market-driven approach outlined above.

Foreign governments should have a consultative but not directive role in consortium development. Their participation should focus on facilitating local deployment by ensuring regulatory compatibility and fostering public trust in U.S.-aligned AI infrastructure. This cooperative model supports "local-first" AI deployments that align with national digital strategies while maintaining U.S. oversight.

To facilitate these dual objectives of foreign participation and government support, the Department of Commerce should consider a "trusted partner" program to formalize collaboration with foreign companies and countries that meet defined security and governance criteria. Certification should require adherence to export controls and cybersecurity frameworks consistent with U.S. policy. Trusted partner status would expedite participation in consortia and

access to U.S. AI export packages, while providing assurance to host nations of compliance and reliability.

IV. Foreign Markets

A. Priority Countries and Regions

The Program should prioritize export engagement with countries and regions that advance both U.S. innovation leadership and national security objectives. The Department should evaluate potential partners based on clear criteria, namely, alignment with U.S. values and governance frameworks, strength of digital infrastructure and innovation ecosystems, and openness to fair and reciprocal market access.

First, U.S. policy should continue to prioritize engagement with trusted allies and advanced digital economies, including the European Union, the United Kingdom, Japan, Taiwan, and South Korea. These partners have mature digital economies and maintain high levels of regulatory transparency. Collaboration with these markets will not only reinforce existing technological partnerships but also support interoperability in standards and governance approaches, strengthening the global position of U.S. AI firms.

Second, the Program should focus on high-growth digital hubs, such as Singapore, the United Arab Emirates, and Malaysia, that combine robust innovation ecosystems with strategic importance as regional technology gateways. These economies possess advanced computing infrastructure and maintain openness to foreign investment, creating fertile ground for U.S. AI exports. Supporting engagement in these markets would help diversify U.S. commercial exposure and mitigate the risk of losing ground to competitors from non-like-minded jurisdictions.

Finally, U.S. efforts should also extend to emerging markets, particularly in Africa and the Americas, where digital transformation is accelerating but access to capital and AI infrastructure remains limited. Targeted capacity-building initiatives, public-private partnerships, and export financing tools will enable these regions to adopt U.S. AI technologies. This engagement is critical to unlocking AI's potential to accelerate economic growth and development, as emerging markets demonstrate the greatest prospects for AI-driven employment

gains while facing the most significant capital and infrastructure constraints.[6] Well-designed financial support can therefore play a decisive role in enabling exports of the U.S. AI stack. Moreover, exporting the U.S. AI stack to these markets would also provide a strategic counterweight, ensuring that foreign governments have viable alternatives to closed, dependency-creating systems. Many of these markets are now the focus of competing models that pair infrastructure with concessional financing in ways that can bind governments to a single, high-risk provider.[7] Taken together, these efforts will help ensure that U.S. AI exports support sustainable growth while strengthening openness and resilience in key emerging markets.

Including a wide range of markets within the American AI Exports Program is essential to achieving scale in the face of rapidly expanding global demand for AI technologies. Effectively scaling AI exports depends on early and broad adoption across diverse markets. If the United States does not meet this global demand, competitors from countries of concern will, embedding their technologies and norms into the foundational layers of emerging digital economies. Ensuring that U.S. AI systems are present in every market is therefore not optional; it is essential to preventing a world in which alternative models dominate by default. Limiting engagement to a narrow group of allies would constrain opportunities for U.S. firms to achieve the scale needed to sustain leadership in R&D and downstream applications. By contrast, a multi-tiered approach ensures that U.S. AI technologies define the next generation of global digital systems.

The diversity of these markets also underscores the need for differentiated support mechanisms tailored to local conditions. In advanced economies such as Japan, the EU, and South Korea, where infrastructure is mature but regulatory complexity is high, U.S. government assistance should emphasize policy coordination, regulatory navigation, and standards alignment to remove barriers and facilitate certification. Conversely, in developing and high-growth markets across Africa, Southeast Asia, and Latin America, export financing, concessional

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[6] United Nations Office of the Secretary-General's Envoy on Technology. (2025). *Mind the AI Divide: Shaping a Global Perspective on the Future of Work.* https://www.un.org/digital-emerging-technologies/sites/www.un.org.techenvoy/files/MindtheAIDivide.pdf.

[7] Clynch, H. (2025, November 19). Caution urged as Chinese AI takes root in Africa. *African Business*. https://african.business/2025/11/technology-information/caution-urged-as-chinese-ai-takes-root-in-africa; Zhou, V. (2025, September 18). Banned in the U.S. and Europe, Huawei aims for the developing world's AI. *Rest of World*. https://restofworld.org/2025/huawei-us-ban-ai-cloud/.

lending, and public-private partnerships will be more effective in addressing capital constraints and enabling large-scale AI infrastructure deployment.

B. Assessment Criteria

When evaluating priority markets for American AI exports, assessments should consider the full range of factors that underpin a strong digital economy, including robust energy and data infrastructure and regulatory predictability. AI systems require not only stable and scalable electricity but also secure cloud networks, advanced computing capabilities, and skilled workforces capable of integrating AI tools across sectors.

In addition, the U.S. should assess proposed and enacted regulatory barriers that risk impeding access for U.S. firms when determining priority markets.[8] This encompasses both traditional barriers to digital trade, such as data localization mandates and restrictions on cross-border data flows, as well as a growing body of regulations that, by structure and operation, inhibit the development and deployment of AI technologies. These include forced disclosure of source code, algorithms, model weights, or training data; imbalanced copyright obligations; and obligations based on inaccurate proxies like compute thresholds, which can directly impede the cross-border supply of AI services. However, the existence of barriers should not automatically disqualify markets from consideration. Rather, they should inform targeted engagement strategies, combining export support, capacity building, and diplomatic engagements to address underlying policy constraints. Prioritizing countries that show commitment to addressing such barriers will ensure that the American AI Exports Program advances near-term commercial opportunities without blocking engagement with a broader range of global markets where foreign competitors are increasingly making inroads.

V. Federal Support Mechanisms

Of the federal support mechanisms available under E.O. 14320, the most impactful for potential program participants include providing regulatory guidance, supporting enabling environments in priority markets, and providing financing mechanisms.

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[8] CCIA. (2025, October 29). *Comments of the Computer & Communications Industry Association Regarding Foreign Trade Barriers to U.S. Exports for the 2026 National Trade Estimate*. https://ccianet.org/wp-content/uploads/2025/10/CCIA-Comments-for-the-2026-USTR-National-Trade-Estimate-Report-1.pdf.

Regulatory guidance can help exporters align their operations with evolving AI governance frameworks abroad, particularly in jurisdictions with complex or fast-changing requirements. ITA, in coordination with the Economic Diplomacy Action Group (EDAG), should issue regular policy briefs and technical advisories outlining foreign AI and digital economy regulations, certification requirements, and market access conditions to help consortia anticipate risks and identify high-value markets for engagement.

ITA should engage proactively with foreign governments to foster enabling environments for AI exports, including by advocating for the removal of digital trade barriers and advancing mutual recognition of technical standards.[9] Through sustained engagement, the U.S. can help partner governments adopt risk-based, proportionate regulatory frameworks that safeguard rights while enabling innovation. Relatedly, the Department of Commerce should leverage existing mechanisms under the CABDA framework and NIST's mutual recognition agreement (MRA) model to help firms secure recognition of U.S. standards abroad. As noted by NIST in similar contexts, MRAs reduce time and cost for U.S. products entering foreign markets by eliminating redundant certification and facilitating information sharing among regulators, testing bodies, and manufacturers.[10] Extending this approach to AI systems would allow U.S. firms to demonstrate compliance in one jurisdiction and have that recognition accepted in others, easing export friction.

The Department of Commerce should also increase funding and expand the capacity of existing financing mechanisms, such as direct loans, guarantees, and technical assistance programs, to meet the capital intensity of full-stack AI export projects. Strengthening these tools will be essential to ensure that U.S. firms can compete effectively in deploying complex AI infrastructure abroad in response to swiftly growing global demand for trusted AI systems.

VI. National Security Regulations

To ensure that activities under the Program comply with all relevant export control regimes, the Department of Commerce should adopt a risk-based and capability-focused

[9] CCIA. (2023). *Rules of the Road: Trade Principles for a Competitive Global AI Market*. https://ccianet.org/wp-content/uploads/2023/11/CCIA_Trade-Principles-Competitive-Global-AI-Market.pdf.

[10] NIST. (n.d.). *Mutual Recognition Agreements for Conformity Assessment of Telecommunications Equipment*. https://www.nist.gov/standardsgov/mutual-recognition-agreements-conformity-assessment-telecommunications-equipment.

approach consistent with existing best practices under the Bureau of Industry and Security (BIS). Compliance mechanisms should rely on existing structures, such as the Validated End-User framework and the "countries of concern" lists, to distinguish between low-risk, trusted partners and higher-risk destinations. This would allow for targeted oversight where risks of diversion or misuse are highest, while maintaining predictable licensing processes for low-risk transactions, such as intracompany transfers. The U.S. government should adequately resource BIS to ensure enforcement keeps pace with the technological complexity of global trade. BIS should maintain a streamlined, transparent, and timely licensing process to prevent administrative delays that could disadvantage U.S. firms competing internationally against less restricted foreign competitors.

At the same time, the government must craft export controls carefully to avoid creating undue competitive disadvantages for U.S. firms. Overly heavy-handed controls, such as on-chip hardware security requirements for continuous location tracking or remote "kill switches," or overly restrictive market eligibility criteria that limit exports to a handful of destinations, would undermine the global competitiveness of U.S. firms. Such measures could erode customer trust, raise compliance costs, and incentivize foreign buyers to turn to alternative suppliers whose products are not subject to comparable restrictions. Controls that distort commercial markets in this way risk accelerating the very supply chain fragmentation that U.S. policy seeks to prevent.

The U.S. can best reduce global dependence on AI technologies from countries of concern by expanding, not constraining, access to U.S. AI systems in foreign markets. By lowering barriers for trusted partners to procure American AI technologies, the U.S. can directly displace the market share of adversarial ecosystems and promote an open, interoperable, and secure AI marketplace. To do so, the Department should ensure that eligibility for export support extends beyond traditional allies to include emerging markets with growing digital economies, particularly in Africa, Latin America, and Southeast Asia (as detailed in Section IV.A). Similarly, expanding access to both closed- and open-weight AI systems can strengthen global resilience and reduce the appeal of competing offerings developed by countries of concern.

VII. Evaluating Proposals

Assuming multiple consortia are likely to form, the Department should outline how it intends to select or endorse consortia for specific foreign market opportunities. In cases where multiple U.S. companies or consortia pursue the same project abroad, guidance should clarify

whether the U.S. government will follow existing advocacy procedures under the U.S. Government Advocacy Policy,[11] which provides a neutral, transparent process for evaluating requests for official support, or whether the Department will adapt that policy to reflect this new consortia-based structure.

The Department should establish avenues of redress for U.S. firms not participating in a designated consortium but still seeking to compete for an export opportunity under the Program. These firms should retain the ability to seek equivalent commercial support or representation through other channels. Ensuring transparent and non-discriminatory access to advocacy and export promotion tools will prevent the Program from inadvertently favoring select groupings of firms, preserve competition within the U.S. AI industry, and uphold the overarching goal of maximizing American participation in global AI markets.

VIII. Conclusion

The American AI Exports Program presents an important opportunity to strengthen the competitiveness of U.S. firms and to reinforce the United States' leadership in the development and deployment of trusted AI systems. By adopting an expansive definition of the AI technology stack and supporting flexible approaches to consortia formation, the Program can meaningfully support AI exports abroad. Success will depend on ensuring that assistance is directed toward partners that are committed to regulatory transparency and fair market access, while also engaging emerging regions where demand for AI is accelerating and where competing models are rapidly gaining traction. A Program designed along these lines will not only help U.S. companies scale deployments in diverse foreign markets but also reinforce broader national objectives related to economic competitiveness, technological leadership, and secure digital infrastructure. CCIA appreciates the Department's leadership in developing this initiative and welcomes the opportunity to support its continued refinement.

Respectfully submitted,

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[11] International Trade Administration. (n.d.). *U.S. Government Advocacy Policy*. https://www.trade.gov/us-government-advocacy-policy.

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