



July 13, 2026

Mr. Mark DiPlacido
Chair of the Trade Policy Staff Committee
Office of the U.S. Trade Representative
Executive Office of the President
600 17th Street NW
Washington, DC 20508

RE: *Comments of the Initiative for a Digital Africa, Request for Comments and Notice of Public Hearing Concerning the Annual Review of Country Eligibility for Benefits Under the African Growth and Opportunity Act for Calendar Year 2027 (Docket Number USTR-2026-0298; 91 FR 39653)*

The Initiative for a Digital Africa (IDA) appreciates the opportunity to provide views in support of the Office of the United States Trade Representative's 26th annual review of the eligibility of sub-Saharan African countries to receive the benefits of the current African Growth and Opportunity Act (AGOA). IDA strongly supports a long-term reauthorization of AGOA, paired with targeted modernization efforts that reflect the growing importance of digitally enabled trade and services in the U.S.-Africa economic relationship.

Africa is poised to become an increasingly important market for the global digital economy as digitalization continues across the continent and the AfCFTA advances regional economic integration on digital trade rules. Yet this opportunity is increasingly threatened by the emergence of digital trade barriers in a number of African markets. Measures such as data localization mandates, restrictions on cross-border data flows, internet shutdowns, and discriminatory taxes on digital services can undermine investment and limit the growth of integrated digital markets. A modernized AGOA can help reinforce an open and competitive digital environment that supports long-term U.S.-Africa economic engagement and digital connectivity.

IDA supports a long-term reauthorization of AGOA that will provide the predictability necessary to support sustained trade, investment, and digital infrastructure development across the region, and IDA recommends that USTR update AGOA's eligibility framework to better reflect the importance of digital trade and digitally enabled services in the modern economy. This should include consideration of barriers such as data localization requirements, restrictions on cross-border data flows, internet shutdowns, and discriminatory treatment of digital services. Incorporating these issues into AGOA's eligibility framework would help ensure that digital trade barriers are systematically

assessed within the existing review process, while preserving USTR's flexibility to calibrate engagement and maintain broad eligibility across beneficiary countries. Finally, AGOA modernization highlights an opportunity for the U.S. government to more broadly promote both U.S.-Africa and intra-African digital trade, including through engagement on implementation of the AfCFTA and continued pursuit of bilateral trade arrangements with strong digital trade provisions, such as with Kenya.

We appreciate USTR for the consideration of our views and remain available to provide further information.

Sincerely,

The Initiative for a Digital Africa (IDA)

The Initiative for a Digital Africa (www.initiavedigitalafrica.org) is a global network of organisations committed to supporting prosperity, economic growth, and job creation across Africa by promoting the adoption of robust digital policies. IDA's members supporting this statement include: Association for Competitive Technology, Africa Data Centres Association, Africa Information and Communications Technologies Alliance, Business Software Alliance, Computer and Communications Industry Association, Coalition of Services Industries, Information and Communication Technology Association of Malawi, Institute of Information and Communication Technology Professionals Ghana, Lesotho Information and Communication Technology Association, South Africa Information and Communication Technology Association, and TICON Africa.

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