



December 11, 2025

Mr. William Kimmitt
Under Secretary for International Trade
International Trade Administration
U.S. Department of Commerce
1401 Constitution Avenue NW
Washington, DC 20230

Re: Request For Information on the “American AI Exports Program” (Docket Number ITA-2025-0070)

To whom it may concern:

The U.S. Chamber of Commerce (the “Chamber”) welcomes the opportunity to comment on the proposed request for information on the implementation of the American Artificial Intelligence (AI) Exports Program (“the program”), as defined by Executive Order 14320 (the “EO”). Specifically, the initiative seeks to establish “a coordinated national effort to support the American AI industry by promoting the export of full-stack American AI technology packages.”

The Chamber represents companies of all sizes across every sector of the economy, including small businesses, local chambers of commerce, leading industry associations, and large corporations. With equities across the entire technology ecosystem, our membership has critical interests in shaping a forward-looking and credible strategy that complements U.S. AI leadership. At the same time, the Chamber is strongly committed to a balanced regime that safeguards American national security, foreign policy, and economic leadership without excessive restrictions on beneficial U.S. business activity. As foreign adversaries continue efforts to evade U.S. AI export controls, it is critical that the administration ensure American AI exports are prioritized in the markets of reliable partners with aligned economic and security goals.

Additionally, the tech stack should reflect the full diversity of the U.S. AI ecosystem, including chips, models, and other layers of the stack related to data orchestration, enterprise applications, and agents that deliver AI outcomes to every industry. The Chamber looks forward to understanding and informing the administration’s broader AI strategy. We agree that the United States must not only lead in developing cutting-edge AI capabilities, but also ensure that U.S. technologies, standards, and models are widely adopted worldwide to strengthen global interoperability and reinforce America’s technology leadership—while doing so in a

manner fully aligned with our economic and national security objectives, including preventing access by foreign adversaries. The submission below outlines the importance of working with such partners, aligning model interoperability and standards, and continuous engagement with stakeholders, including definitional clarity and guidance, as the program is implemented.

I. Alignment and Collaboration with Trusted Partners

Collaboration with trusted partners will optimize the United States' position in AI leadership. Specifically, the Chamber supports the following program objectives outlined in the EO:

- i. Coordinating U.S. participation in multilateral initiatives and country-specific partnerships for AI deployment and export promotion;
- ii. Supporting partner countries in fostering pro-innovation regulatory, data, and infrastructure environments conducive to the deployment of American AI systems;
- iii. Analyzing market access, including technical barriers to trade and regulatory measures that may impede the competitiveness of U.S. offerings.

In this respect, the program should embrace international engagement in prospective consortia. To best offer a diversity of productive use cases for foreign buyers, the program should enable a range of perspectives in the consortia, and allow trusted, vetted, and globally established companies to address marketplace opportunities. The incorporation of a trusted partner component in consortia initiatives would strengthen coordination on export logistics, innovation, and other priorities through formal agreements or memorandums of understanding ("MOUs").

Concurrently, it is important to establish criteria for identifying trusted partners that promote economic and national security. Trusted partners could be certified based on criteria that includes adherence and alignment on export controls and security standards and/or presence of U.S. subsidiaries on the ground with substantive work with the U.S. government or critical infrastructure providers.

The Commerce program should assess opportunities in the Indo-Pacific, Europe, North America, and beyond. This is especially relevant as the Trump administration works to incorporate related provisions in trade frameworks and "Technology Prosperity Deals¹," which include commitments to promote the export of trusted AI technology stacks, develop AI-ready datasets, bolster the enforcement of technology protection measures, and advance shared work on industry standards. Capitalizing on this recently laid groundwork will enhance a secure and harmonized global market for American AI exports.

¹ <https://www.whitehouse.gov/articles/2025/10/the-united-states-signs-technology-prosperity-deals-with-japan-and-korea/>

Trusted technology partners from outside recipient markets could also be brought into the consortia to help facilitate integration and leverage existing relationships that U.S. firms do not yet have. For example, if the target market is a new location of business for U.S. firms, it may be difficult for those entities to immediately work with local firms or to find opportunities. Meanwhile, technology companies from allied countries may have closer business relationships in the target market and could serve as intermediaries enabling a smoother and more prosperous export opportunity. Such partnerships may also present opportunities to include development finance funding from the partner company's country.

In general, the program should prioritize technical maturity, scalability, strategic alignment, geopolitical risk assessment, and financial sustainability for stack components. This should include requirements that certain stack parts are sourced from strategic partners. While the role of U.S. manufacturers should be intensified in such a program, the use of domestic content requirements should be limited – if incorporated at all – when determining program eligibility.

Due to the amount of cross-border data powering the stack, the program should assess ways to address trade barriers that impede U.S. competitiveness, including data localization requirements in several markets that affect cloud service and other providers. AI offers vast global trade potential, but restrictive government policies like data localization and forced algorithm disclosure hinder U.S. companies offering their AI products and services abroad. Foreign data sovereignty and localization laws, which often masquerade as privacy protections, are among the most significant threats to the cloud-native model. Such policies can make the AI stack prohibitively costly. The U.S. should continue to defend existing mechanisms like the EU-U.S. Data Privacy Framework, negotiate newer mechanisms like the Global Cross Border Privacy Rules System, and push back against protectionist data localization mandates. Moreover, a new wave of AI-specific regulations threatens to create a complex web of compliance burdens and inconsistent regulatory standards. These protectionist measures disproportionately affect U.S. firms and stifle innovation.

II. Flexible Interoperability, Standards Harmonization

U.S. industry operates at the heart of global trade and investment networks, making it imperative to advance rules-based, competitive markets and achieve alignment on emerging technologies. Establishing internationally recognized standards that promote interoperability will be critical to promoting the responsible development and deployment of artificial intelligence worldwide, which is based on U.S. goals and values.

The program should be anchored in a standards-based, open reference architecture that promotes regulatory harmonization, interoperability, and competitive

flexibility. This architecture must define clear technical principles, interoperability standards, and governance frameworks to ensure secure, scalable, and inclusive American AI consortia that align with global norms. By prioritizing transparency, modularity, and collaboration, the program can embed flexibility into its design and enable broad international adoption.

A critical component of this approach is competition within and across the technology stack. The strength of America's AI ecosystem lies in a dynamic, competitive marketplace that delivers maximum value to customers and end-users. This competitive dynamic should be present at every layer of a consortia's stack, not just in the broader market. Government should therefore prioritize consortia structures that reflect a pro-competitive environment, avoiding monopolistic tendencies and encouraging multiple providers for similar functions. Robust competition within the stack will drive innovation, cost efficiency, and resilience—key factors for global leadership and adoption.

Equally important is flexibility and modularity. These pillars will ensure that the American AI technology stack remains adaptable and implementable in diverse international markets. Technology-agnostic products and services should be prioritized to maximize choice for partners and facilitate integration across different regulatory environments. Consortia should be designed to incorporate additional technology providers as needed, including trusted foreign partners where they bring unique market access or integration capabilities, as discussed above. This adaptability is essential for targeting a range of markets, as no single company will be suited to optimize every context. In certain circumstances, the program should also allow for non-consortium members to provide specialized goods or services when necessary to facilitate projects.

By embedding these principles—open architecture, interoperability standards, regulatory harmonization, competition, and flexibility—the program can position U.S. AI leadership as secure, inclusive, and globally trusted, while enabling a vibrant ecosystem that adapts to evolving international requirements.

III. Importance of Continued Guidance, Definitional Clarity

For the program to be effective and cross-cutting, the administration needs to provide more information around core definitions and systems impacted. The Department should adopt a comprehensive view of the AI tech stack, incorporating AI-enabled devices, related service applications, cloud/data centers, systems integrators, and edge AI capabilities. The public call for proposals should explicitly encourage consortia proposals focused both on cloud infrastructure and edge AI innovation.

To encourage the inclusion of the edge, consortia proposals should not only describe how AI will be developed (e.g., training models in data centers) but also how

AI will be delivered and used in daily life through inference on consumer devices and enterprise systems. Edge AI stacks can position the U.S. as a leader in sectors where edge computing is essential (e.g., robotics, automotive, IoT, industrial automation, wearable technology). Global AI leadership will require building both world-class data centers and AI-powered devices that interact directly with human beings. These devices include elements such as edge AI hardware (AI-optimized SoCs, low-power accelerators), on-device inference frameworks, edge-cloud orchestration technologies, and real-world applications. The program could include evaluation criteria that complement data center metrics with incentives to develop robust strategies for capturing global market share in AI inference, scalability, and end-to-end deployment. This is essential as inference—not just training—is where AI delivers value to consumers and enterprises.

Additionally, the consortia should implement a dedicated structure for input from subject matter experts that understand export nuances and are able to help companies navigate certain processes. For example, companies that do not have substantive or relevant export experience will need to understand foreign regulatory compliance. It will also be important to include cybersecurity experts to assist companies in assessing national security considerations, including how to maintain supply chain integrity and anticipate adversarial risks. This is an opportunity to include perspectives and companies that already have a global reach and presence early in the conversation and learn from their experience operating in selected foreign countries, deploying AI abroad, and navigating the coordination with U.S. partners or technologies.

IV. High-level Recommendations:

As the administration works to shape the program's success, funding programs, upskilling initiatives, and other efforts will also be critical.

- i. Funding Prioritization: The EO notes that the “Economic Diplomacy Action Group” shall coordinate mobilization of federal financing tools in support of AI export packages. In this respect, it will be important to understand which federal financial programs are in scope and how the administration plans to strengthen existing funding mechanisms for such programs. One such program could be the U.S. International Development Finance Corporation (DFC), which expired in October. The Chamber has supported reauthorization of the DFC as a primary tool to advance U.S. strategic and economic interests in emerging markets. A flexible and adequately appropriated DFC could enable a tailored export structure focused specifically on the tech stack.
- ii. Upskilling Initiative Component: Upskilling initiatives will also be key to the program's success. AI promises to propel economies forward — but this can only happen if workers know how to use AI to enhance their productivity and

expertise. More collaboration between the public and private sectors is needed to build AI fluency, strengthen STEM education and increase online learning opportunities.

- iii. Data System Updates: The importance of modernizing national data systems cannot be overstated. Such systems are critical to ensuring high-quality datasets represent diverse perspectives, languages and cultures – all of which are essential for training AI models effectively for local markets. Governments should commit to better utilizing and sharing data to improve public services like health care, education, transportation and disaster response, and invest in the infrastructure needed to promote responsible use of data.
- iv. Address AI, Other Barriers: For the United States to fully unleash its technology and innovative spirit to further advance the American technology stack, the administration must focus on removing unnecessary barriers for U.S. businesses to be able to better compete and innovate. Among other initiatives, the Chamber recently responded to the Office of Science and Technology Policies (OSTP) request for comment on identifying existing Federal statutes, regulations, agency rules, guidance, forms, and administrative processes that unnecessarily hinder the development, deployment, and adoption of artificial intelligence (AI) technologies within the United States². Therein, the Chamber highlighted numerous barriers that inhibit further innovation and encouraged the administration to prioritize addressing such issues to unleash U.S. technological leadership.

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The Chamber appreciates the opportunity to provide these comments and welcomes continued engagement with ITA on these issues.

Sincerely,



John Murphy
Senior Vice President and
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²U.S. Chamber of Commerce, *Response to OSTP's Request for Information on Regulatory Reform for Artificial Intelligence*, 28 Oct. 2025, <https://www.uschamber.com/technology/response-to-ostps-request-for-information-on-regulatory-reform-for-artificial-intelligence>. [uschamber.com]