

November 7, 2025

The Honorable 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 Extension of Comment Deadline – American AI Exports Program RFI
(Docket No. 251023-0165)**

Dear Under Secretary Kimmitt:

On behalf of the undersigned organizations, we write to respectfully request an extension of the public comment deadline for the Request for Information (RFI) regarding the American AI Exports Program, published in the Federal Register on October 28, 2025 (Docket No. 251023-0165). The RFI indicates that the deadline for comments is November 28, which falls at the end of Thanksgiving week, a period when many stakeholders may be unavailable due to family and holiday commitments.

We respectfully request a **15-day extension** of the comment deadline, moving it from **November 28, 2025 to December 13, 2025**. This additional time would allow for more robust engagement and ensure that the Department receives high-quality feedback that supports the success of the Program.

We commend the Department of Commerce and the International Trade Administration for launching this important initiative pursuant to Executive Order 14320, “Promoting the Export of the American AI Technology Stack.” The Program represents a significant opportunity to strengthen U.S. leadership in artificial intelligence and foster strategic international partnerships.

Given the complexity and breadth of the topics covered in the RFI – including full-stack AI technology packages, consortia formation, foreign market engagement, national security considerations, and federal support mechanisms – additional time is necessary to develop thoughtful, comprehensive, and representative responses. Many of our organizations are actively coordinating with stakeholders across industry, academia, and civil society to ensure our input reflects the diverse perspectives and technical expertise required to inform the Program’s design and implementation.

Thank you for your consideration of this request. We remain committed to supporting the Department's efforts to advance U.S. competitiveness in AI and look forward to contributing to this important initiative.

Sincerely,

ACT | The App Association

Business Software Alliance

Coalition of Services Industries (CSI)

Computer & Communications Industry Association

Consumer Technology Association (CTA)

INCOMPAS

Information Technology Industry Council (ITI)

National Foreign Trade Council (NFTC)

Semiconductor Industry Association (SIA)

Software & Information Industry Association (SIIA)

Technology Trade Regulation Alliance (TTRA)

Telecommunications Industry Association (TIA)

U.S. Chamber of Commerce

U.S. Council for International Business