



1919 S. Eads St.  
Arlington, VA 22202  
703-907-7600  
CTA.tech

December 12, 2025

via [www.regulations.gov](http://www.regulations.gov)

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: American AI Exports Program Comments (ITA-2025-0070)**

Dear Under Secretary Kimmitt,

As North America's largest technology trade association, the Consumer Technology Association® ("CTA") is the tech sector. Our members are the world's leading innovators—from startups to global brands—helping support more than 18 million American jobs.

CTA member companies continue to lead in developing and implementing AI-enabled systems and solutions that positively impact human and societal development: promoting growth, improving the welfare and well-being of individuals, and enhancing global innovation and productivity. CTA is also a standards body accredited by the American National Standards Institute ("ANSI") and has played a significant role in shaping the technology industry. CTA's standards have been instrumental in providing transparency and insight since 1924, with over 1100 active participants.

CTA strongly supports the Administration's efforts to promote exports of the "full AI technology stack—hardware, models, software, applications, and standards."<sup>1</sup> To best support American AI leadership, the American AI Exports Program should:

- Leverage industry-driven AI standards consistent with U.S. priorities;
- Support national security by nurturing partnerships with strategic allies and key trading partners and working together with those nations for trusted technology solutions;
- Catalyze U.S.-led innovation, development, and manufacturing; and
- Create good jobs and promote economic growth across the United States.

To achieve these goals, CTA recommends that the International Trade Administration ("ITA") incorporate technical standards and, as needed, AI-enabled edge devices,

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<sup>1</sup> American AI Exports Program, <https://aiexports.gov> (last visited Dec. 12, 2025).

software, and cloud services in full-stack AI technology packages, adopt broad and flexible rules for consortia membership and evaluating proposals, prioritize exports to contested markets and markets with high demand for the AI stack, and actively encourage small- and medium-size enterprises to participate.

### **1. A Full-Stack AI Technology Package Should Include Technical Standards and AI-Enabled Edge Devices and Software.**

In Executive Order 14320, President Trump made clear that the Program should support the range of technologies that must come together to fully realize AI's benefits.<sup>2</sup> Consistent with E.O. 14320's broad description of the AI technology stack, ITA should clarify that consortia supported by the Program should certify their use of appropriate technical standards and may include AI-enabled edge devices and software in their AI technology stack.

**Technical Standards.** To address E.O. 14320's inclusion of "measures to ensure the security and cybersecurity of AI models and systems,"<sup>3</sup> a full-stack AI technology package should include technical standards created or endorsed by U.S. industry. Through collaborations led by CTA and other standards bodies, U.S. innovators have led the way on industry-driven technical standards governing AI use and development, including:

- ANSI/CTA-2096: Guidelines for Developing Trustworthy Artificial Intelligence Systems;
- ANSI/CTA-2125: Best Practices and Recommendations for Information Disclosure;
- ISO/IEC 23894:2023: Information Technology – Artificial Intelligence – Guidance on Risk Management;
- ISO/IEC 42001:2023: Information Technology – Artificial Intelligence – Management System; and
- IEEE P2863: Recommended Practice for Organizational Governance of Artificial Intelligence (in development).

In a rapidly developing field like AI, incorporating industry-led standards will meet the President's security and cybersecurity requirements flexibly and efficiently, without duplicative and time-consuming development of new mandates. Industry-driven standards draw on widespread technical expertise, lower compliance costs, enhance interoperability, and can be updated to respond to technology changes and new risks. Including appropriate standards will ensure that the full-stack packages promoted by the

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<sup>2</sup> See Exec. Order No. 14320, 90 Fed. Reg. 35393, 35393 (July 23, 2025) (listing "AI-optimized computer hardware . . . data center storage, cloud services, and networking," "data pipelines and labeling systems," "AI models and systems," "measures to ensure the security and cybersecurity of AI models and systems," and "AI applications for specific use cases"); see *also* American AI Exports Program, <https://aiexports.gov> (last visited Dec. 12, 2025) ("The United States must meet global demand for AI by exporting its full AI technology stack—hardware, models, software, applications, and standards.").

<sup>3</sup> Exec. Order No. 14320, 90 Fed. Reg. 35393, 35393 (July 23, 2025).

Program appropriately manage risk. It will also encourage other nations to adopt the same standards, further expanding opportunities for U.S. exporters.

Incorporating standards need not be burdensome. ITA should require consortia to self-certify their use of standards either (1) published by accredited standards bodies or (2) identified by the National Institute of Standards and Technology (“NIST”). NIST has the technical expertise to identify relevant standards across various use cases.<sup>4</sup>

***AI-Enabled Edge Devices and Software.*** To maximize the Program’s benefits, ITA should clarify that a full-stack AI technology package may include AI-enabled edge devices and software necessary for end-users to get the benefits of a specific use case. As AI adoption scales, edge AI is increasingly useful to address bandwidth and energy constraints.<sup>5</sup> Edge AI also enables AI use cases that rely on extremely low latency and require heightened privacy and security measures.<sup>6</sup>

For many AI use cases, AI-enabled edge devices or software are necessary components of the overall package. For example, many healthcare AI use cases depend on data drawn from a sensor on the patient’s body. The sensor may include AI-enabled edge software to analyze data locally and provide real-time alerts. Even if the sensor does not have onboard AI processing capabilities, it plays an essential role in the AI system. For other use cases, AI-enabled edge devices may include autonomous vehicles, wearables, PCs, smart home appliances, smart security cameras, voice assistants, and point-of-sale systems, as well as industrial devices, such as sensors, gateways, logistics tools, robots, and drones.

Integrating AI-enabled edge devices and software will create a comprehensive—and attractive—package for potential buyers while expanding the economic and security benefits for the United States. Consortia need to attract as many buyers as possible to achieve the goal of worldwide adoption of “American AI technologies, standards, and governance models.”<sup>7</sup> And if ITA does not include AI-enabled edge devices and software in the Program, buyers will likely be forced to separately source essential components of the tech stack, potentially introducing security vulnerabilities and interoperability challenges.

## **2. ITA Should Adopt Broad and Flexible Criteria for Consortium Membership.**

ITA should allow for a flexible and broad range of voluntary industry groupings to qualify as “consortia” under the Program. A grouping of companies that can jointly demonstrate capability to deliver a full-stack AI export offering should qualify as a consortium, regardless of whether this grouping has formed a new legal entity or other formal association. ITA should not use strict consortia requirements that would be difficult for

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<sup>4</sup> See NIST, *Artificial Intelligence: AI Standards*, <https://www.nist.gov/artificial-intelligence/ai-standards> (last visited Dec. 12, 2025) (explaining NIST’s role in the development of AI technical standards).

<sup>5</sup> See Kay Firth-Butterfield and Beena Ammanath, *At the Edge of Innovation: What Can Edge AI Do for You?*, WORLD ECONOMIC FORUM (May 30, 2022), <https://www.weforum.org/stories/2022/05/at-the-edge-of-innovation-what-can-edge-ai-do-for-you>.

<sup>6</sup> See *id.*

<sup>7</sup> Exec. Order No. 14320, 90 Fed. Reg. 35393, 35393 (July 23, 2025).

industry to achieve, require realignment of the complex, market-oriented value chains through which the AI technology stack is now delivered, or exclude otherwise eligible participants from the Program.

U.S.-domiciled companies lead the world on many AI technologies. Still, many valuable use cases require a range of global suppliers and partners to complete the full stack. ITA should allow participation by companies, including those from partner countries, that create significant American jobs and economic impact, without imposing strict limitations on foreign ownership or principal place of business.

ITA should allow consortia that export full-stack AI technology packages containing significant American components and intellectual property, even if some non-U.S. components are included. For example, necessary components of AI-enabled edge devices may not be available from U.S. manufacturers or components from U.S. manufacturers may not meet consortia demands. Allowing these packages supports the Program's goals by enabling more use cases to be represented by a truly complete technology stack so the United States can more successfully compete in the global market.

Congress has recognized that promoting products manufactured in the United States—even if not all component parts were manufactured in the United States—supports American economic and national security goals. For example, the Build America, Buy America Act, which requires certain products used in federally funded infrastructure projects to be produced in the United States, allows the use of products if “[t]he cost of the components of the manufactured product that are mined, produced, or manufactured in the United States is greater than 55 percent of the total cost of all components of the manufactured product.”<sup>8</sup>

Similarly, the Export-Import Bank of the United States (“EXIM Bank”) advances its mission to support U.S. jobs by supporting exports of products and services that are significantly, but not exclusively, comprised of U.S.-made components. For short-term programs, EXIM Bank generally requires that products “have more than 50% U.S. content based on all direct and indirect costs, including but not limited to labor, materials, research and administrative costs” to be eligible for full financing.<sup>9</sup> For medium- and long-term programs, the threshold for full financing is 85% U.S. content.<sup>10</sup>

For related reasons, ITA should allow trusted foreign-headquartered companies with a significant presence in the United States to participate in consortia, consistent with the RFI's proposal to create a “trusted partner” program for foreign countries and companies.<sup>11</sup> To streamline the process and avoid confusion, ITA should adopt existing

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<sup>8</sup> 2 C.F.R. § 184.3 (defining “produced in the United States”).

<sup>9</sup> EXIM Bank, *Short-Term Content Policy*, <https://www.exim.gov/policies/content/short-term-content-policy> (last visited Dec. 12, 2025).

<sup>10</sup> See EXIM Bank, *Medium- and Long-Term Content Policy*, <https://www.exim.gov/policies/content/medium-and-long-term> (last visited Dec. 12, 2025); see also, Shayerah Ilias Akhtar, *Export-Import Bank: Overview and Reauthorization Issues*, CONGRESSIONAL RESEARCH SERVICE at 8–9 (Aug. 9, 2019).

<sup>11</sup> Notice of American AI Exports Program RFI, 90 Fed. Reg. 48726, 48727 (Oct. 28, 2025).

categories of allies and partners, such as membership in the North Atlantic Treaty Organization (“NATO”) and designation as a Major Non-NATO Ally.<sup>12</sup> Allowing ally participation will significantly benefit the United States by encouraging further investment in local economies in the United States where these foreign companies have already invested, creating high-quality jobs and spurring economic growth. It will also support U.S. national security goals by strengthening ties with existing allies and partners.

### **3. ITA Should Adopt Broad Criteria for Evaluating Proposals and Fully Resource the Program.**

ITA should adopt broad criteria for evaluating proposals that reflect the range of AI use cases and fully resource the Program so all qualified consortia can benefit. Around the world, potential customers want to adopt a wide variety of different use cases that reflect their needs and priorities. Solutions will range from relatively straightforward API access to AI models to complex hardware arrangements involving AI-enabled software and edge devices specialized to a particular need. The Program should meet as much of that demand as possible and display the full range of American innovation.

Market forces are the best tool to fill this varied demand. Accordingly, ITA should work to fully resource the Program so all consortia that meet the E.O. 14320 and ITA requirements can participate. ITA should avoid picking winners and losers to the greatest extent possible. If resources require ITA to prioritize consortia as contemplated in E.O. 14320,<sup>13</sup> ITA should work to identify the consortia creating the greatest direct economic benefit in the United States. Job creation should be an important factor in that calculation.

### **4. ITA Should Prioritize Exports to Contested Markets and Markets with High Demand.**

ITA should select target markets that maximize the Program’s national security and economic impact. First, the Program should prioritize exports to regions where U.S. strategic competitors are actively seeking to gain technological footholds, influence foreign regulatory environments, and establish AI infrastructure dependencies.

The U.S. intelligence community has concluded that China “almost certainly” has a national strategy to establish global AI dominance by 2030.<sup>14</sup> The 2025 U.S.-China Economic and Security Review Commission annual report found that Chinese tech

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<sup>12</sup> See 22 U.S.C. § 2321k. Under Pub. L. 107–228, Taiwan is treated as a Major Non-Nato Ally without formal designation as such. See U.S. Department of State, *Major Non-NATO Ally Status: Fact Sheet* (Jan. 20, 2025), <https://www.state.gov/major-non-nato-ally-status>.

<sup>13</sup> See Exec. Order No. 14320, 90 Fed. Reg. 35393, 35394 (July 23, 2025) (directing the Secretary of Commerce to evaluate proposals for participation in the Program and select some for priority access to the Program’s benefits).

<sup>14</sup> See Office of the Director of National Intelligence, *Annual Threat Assessment of the U.S. Intelligence Community* at 13 (March 2025); see also U.S.-China Economic and Security Review Commission, *2024 Report to Congress* at 180 (Nov. 2024), [https://www.uscc.gov/sites/default/files/2024-11/2024 Annual Report to Congress.pdf](https://www.uscc.gov/sites/default/files/2024-11/2024%20Annual%20Report%20to%20Congress.pdf) (noting that the State Council released an AI strategy that “called for increased funding and support to make China a leader in AI theory, technology, application, and innovation by 2030” in 2017).

companies “are beginning to invest in industries including semiconductors, AI, and data centers under [the Belt and Road Initiative]’s Digital Silk Road (DSR) initiative, creating security risks for host countries and competing with U.S. firms for market share” in Southeast Asia.<sup>15</sup> Likewise, the 2024 report highlighted increasingly close cooperation between China and the Middle East on AI technology.<sup>16</sup>

As the Administration’s AI Action Plan recognizes, the United States must effectively counter these moves to maintain American technological competitiveness and advance U.S. national security interests.<sup>17</sup> By prioritizing direct competition with China in Belt-and-Road-Initiative countries, the United States can strengthen existing ties with these countries (including some U.S. allies), replace the Chinese AI stack in these markets with trustworthy supply chains, and ensure American AI technology is not squeezed out of global markets.

Additionally, the Program should prioritize exports to countries with significant demand for full-stack AI packages. Even if not directly competing with China in these markets, promoting American exports will further entrench American AI technology and standards abroad, hindering China’s efforts to establish its AI stack as the global default. By targeting countries with high demand, the Program is also more likely to successfully generate jobs and economic growth in the United States.

#### **5. The Administration Should Actively Recruit Participation from Small- and Medium-Sized Enterprises.**

Small businesses and start-ups—companies that make up 80 percent of CTA membership—drive innovation in the AI space. These entrepreneurs form the vibrant core of American tech, creating millions of high-skilled jobs, adapting quickly to new ideas, and producing disruptive innovation. But they may not have the tools or experience to engage in widespread export promotion on their own.

As E.O. 14320 recognizes, the Small Business Administration (“SBA”) can play an important role in the American AI Exports Program. SBA has experience with outreach and export promotion efforts that are tailored to smaller enterprises.<sup>18</sup> In addition to leveraging SBA’s existing export promotion efforts, ITA should explore how SBA could assist in matching small businesses with relevant capabilities with broader consortia. Encouraging small business participation will help ensure the Program benefits a wide

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<sup>15</sup> U.S.-China Economic and Security Review Commission, *2025 Report to Congress* at 231 (Nov. 2025), [https://www.uscc.gov/sites/default/files/2025-11/2025\\_Annual\\_Report\\_to\\_Congress.pdf](https://www.uscc.gov/sites/default/files/2025-11/2025_Annual_Report_to_Congress.pdf).

<sup>16</sup> See U.S.-China Economic and Security Review Commission, *supra* note 14 at 367–68.

<sup>17</sup> See Office of Science and Technology Policy, Executive Office of the President of the United States, *Winning the Race: America’s AI Action Plan* at 20 (July 2025), <https://www.whitehouse.gov/wp-content/uploads/2025/07/Americas-AI-Action-Plan.pdf>.

<sup>18</sup> See generally Anthony Cilluffo et. al, *Small Business Administration Trade and Export Promotion Programs*, CONGRESSIONAL RESEARCH SERVICE (May 24, 2022).



range of communities, including those in rural areas, and sparks economic opportunity for the entrepreneurs who create the majority of American jobs.<sup>19</sup>

## **6. ITA Should Study Tariffs' Effect on Full-Stack AI Exports.**

To support the Secretary of State and the Economic Diplomacy Action Group's responsibility to analyze regulatory measures impeding the competitiveness of U.S. AI stack offerings,<sup>20</sup> ITA should study the effect of the Administration's additional tariffs under the International Emergency Economic Powers Act, Section 232 of the Trade Expansion Act of 1962, Section 301 of the Trade Act of 1974, and other statutes on the competitiveness of U.S. full-stack offerings. Tariffs may hamper consortia's ability to offer attractive export packages. Tariffs are, for example, raising the costs of certain components to be included in the U.S. AI stack above what target countries would pay without U.S. involvement—undercutting American advantage. Better understanding these effects will help ensure the Program's success.

## **7. Conclusion**

CTA and its members applaud the Administration's efforts to fuel AI innovation through the American AI Exports Program. By adopting flexible definitions and evaluation criteria, focusing on the export markets where global competition is greatest and demand is highest, and leveraging the strength of American small business, ITA can design a program that leaves a lasting mark on the global AI economy. Thank you for this opportunity to comment.

Sincerely,



Ed Brzytwa  
Vice President, International Trade  
Consumer Technology Association



J. David Grossman  
Vice President, Policy and Regulatory Affairs  
Consumer Technology Association

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<sup>19</sup> U.S. Bureau of Labor Statistics, *The Economics Daily: Small Businesses Continue to Outpace Large Businesses in Job Creation* (May 8, 2025), <https://www.bls.gov/opub/ted/2025/small-businesses-continue-to-outpace-large-businesses-in-job-creation.htm>.

<sup>20</sup> See Exec. Order No. 14320, 90 Fed. Reg. 35393, 35394 (July 23, 2025).