



December 13, 2025

Mr. William Kimmitt
International Trade Administration
U.S. Department of Commerce
1401 Constitution Ave NW
Washington, DC 20230

Dear Mr. Kimmitt

On behalf of the Center for Data Innovation (datainnovation.org), I am pleased to submit this response to the International Trade Administration's (ITA) Request for Information (RFI) regarding the establishment and implementation of the American AI Exports Program, as directed by Executive Order 14320.¹

The Center for Data Innovation studies the intersection of data, technology, and public policy. The Center formulates and promotes pragmatic public policies designed to maximize the benefits of data-driven innovation in the public and private sectors. It educates policymakers and the public about the opportunities and challenges associated with data, as well as technology trends such as open data, artificial intelligence, and the Internet of Things. The Center is part of the Information Technology and Innovation Foundation (ITIF), a nonprofit, nonpartisan think tank.

Yours sincerely,

Hodan Omaar
Senior Policy Manager
ITIF's Center for Data Innovation

¹ Federal Register, "American AI Exports Program," October 28, 2025,
<https://www.federalregister.gov/documents/2025/10/28/2025-19674/american-ai-exports-program>.



RESPONDENT BACKGROUND AND EXECUTIVE SUMMARY

The Center for Data Innovation recognizes that the RFI primarily seeks feedback from potential American AI exporters. We are submitting this response not as a commercial entity, but as a non-partisan policy think tank to provide high-level, strategic guidance on the Program's framing, resource allocation, and policy principles. We have a strong interest in policies that promote American technological leadership, including the global deployment and export of AI technologies, and our expertise in AI policy, market dynamics, and global competitiveness allows us to offer valuable perspectives on the design and implementation of the American AI Exports Program (the Program).

Specifically, we recommend the following:

1. Commerce should clarify that the Program's role is to expand the ability of U.S. companies to export AI to foreign markets, not gatekeep American AI exports.
2. Commerce should direct the Program's resources to priority regions.
3. Commerce should include allies as partners to expand the reach of American AI exports.
4. Commerce should use the Program to advance an alternative to AI sovereignty rooted in openness and competition.
5. Commerce should communicate the strength of its offering through clear economic and security benefits, not values-based framing.

Our goal is to ensure the Program's design maximizes the expansion of U.S. AI technology and reinforces American leadership globally.

1. COMMERCE SHOULD CLARIFY THAT THE PROGRAM'S ROLE IS TO EXPAND THE ABILITY OF U.S. COMPANIES TO EXPORT AI TO FOREIGN MARKETS, NOT GATEKEEP AMERICAN AI EXPORTS

Policymakers should make clear that the purpose of the Program is to expand U.S. AI exports, not to create a centralized government channel through which any partnerships with American AI companies must pass through. American companies are already securing many commercially attractive AI partnerships on their own. Firms like AWS, Google, Microsoft, NVIDIA, and OpenAI have launched major full-stack deployments abroad through their own standard commercial channels. Inserting the U.S. government into these partnerships would risk slowing diffusion.

Instead, the Program's role should be to open markets that are strategically significant, face commercialization challenges, or are otherwise hard to enter, and to ease the constraints that prevent U.S. AI companies from operating in those places. The Program should function as a tool to open more doors for American AI rather than a bottleneck on what already works.



2. COMMERCE SHOULD DIRECT THE PROGRAM'S RESOURCES TO PRIORITY REGIONS.

While the Program's role is to expand the reach of U.S. AI by supporting greater diffusion, the Executive Order makes clear that this expansion serves two distinct ends: strengthening U.S. economic competitiveness and advancing national security and foreign policy goals. Because these goals differ, the regions the Program prioritizes for each will differ as well.

For economic competitiveness, the Program should focus on regions that firms already have an interest in entering but where financing gaps, risk exposure, or regulatory delays prevent otherwise commercially viable projects from moving forward. Here, the Program's role is to facilitate and derisk activity that industry already wants to undertake because commercial incentive exists, but the enabling conditions do not.

For national security and foreign policy, the Program should focus on places that are strategically important to the United States because of how they strengthen security cooperation, deepen geopolitical partnerships, or reduce the influence of adversarial actors. While there may be some overlap with commercially attractive markets, some of the regions that matter most for strategic reasons may not surface organically in a firm's commercial planning at all.

To maximize progress across these two mandates under resource constraints, the Program needs a clear and coordinated strategy for how it will advance both simultaneously. This should begin with the Secretary of Commerce identifying the highest-priority regions for economic opportunities, and then working with the Secretaries of State and Defense to identify the regions most vital for strategic presence. These leaders, alongside the Secretary of Energy and the Director of the Office of Science and Technology Policy, should then overlay their regional priorities and determine how the Program's resources can be deployed to drive the strongest combined gains across both economic and strategic objectives.

Even if some regions appear on both lists—places where U.S. economic competitiveness could grow and where national security interests are strong—the Program should not treat those consensus picks as automatically more valuable. Overlap simply shows where the two mandates happen to point to the same country; it does not necessarily say where the Program can drive the greatest overall expansion of U.S. AI reach. In practice, a single country that delivers only modest gains on both fronts may be less impactful than supporting two different countries—one that delivers a major commercial gain and another that delivers a major strategic gain—even if neither appears on both lists. The real task is to identify the combination of regions that produces the largest total increase in diffusion, access, and strategic presence. A shared overlay helps enable that approach by treating the Program as an optimization problem: not a search for the neatest intersection, but a way to determine the portfolio of regions that maximizes the Program's overall impact.



3. COMMERCE SHOULD INCLUDE ALLIES AS PARTNERS TO EXPAND THE REACH OF AMERICAN AI EXPORTS

Many foreign governments are asking how their domestic industries can plug into the Program and whether their chips, models, or applications will be included in a U.S.-curated AI stack. That question stems from how some U.S. officials have described the stack, as if it is a single menu of components that Washington assembles and partners then choose from. This framing suggests a binary choice: either the stack is purely American or it is opened to foreign contributions.

But that is the wrong way to think about it. In practice, U.S. companies already operate in two modes at once. They partner with other U.S. firms wherever collaboration improves performance, expands reach, or fills capability gaps. And they partner with foreign firms whenever those collaborations enhance competitiveness, accelerate technical progress, or support global deployment. Indeed, many domestic AI implementations involve a combination of both foreign and local components.

Both kinds of collaboration are central to AI diffusion and the Program should be extending the reach of both: strengthening domestic collaboration where American firms can scale together, and amplifying foreign partnerships when they broaden American AI diffusion or advance strategic goals in third markets. Policymakers should therefore make clear that the Program welcomes and encourages allied participation and should establish pathways such as joint development financing, coordinated deployments, and co-supported capacity-building initiatives that allow partners to contribute to the Program's work. These mechanisms multiply rather than dilute U.S. influence. They create an ecosystem in which allied contributions expand the reach of U.S. technology, open new markets, and reinforce a shared strategic alignment.

A practical example shows why this matters. NVIDIA and Mistral have partnered to produce highly efficient open-weight models—a collaboration driven by technical logic but with significant geopolitical relevance, given China's aggressive push of its own open-source models in emerging markets.² Through the Program, the United States could work with France to champion this joint offering in contested regions where China is gaining influence. And in many parts of the world, diplomatic and development channels run more deeply through non-U.S. actors. In Southern Africa, for instance, the UK–Canada–Sweden–funded Artificial Intelligence for Development (AI4D) program plays a central role in supporting local AI ecosystems, while in East Africa it is the German-funded Digital for Development (D4D) initiative. Leveraging those allied networks alongside U.S. technology would extend diffusion farther and faster than Washington could achieve alone.

² Kari Briski, "NVIDIA Partners With Mistral AI to Accelerate New Family of Open Models." *NVIDIA Blog*, December 2, 2025. <https://blogs.nvidia.com/blog/mistral-frontier-open-models/>.



4. COMMERCE SHOULD USE THE PROGRAM TO ADVANCE AN ALTERNATIVE TO AI SOVEREIGNTY ROOTED IN OPENNESS AND COMPETITION

Some countries are pursuing “AI sovereignty,” a term that refers to the ability of a nation to independently control its own AI infrastructure, systems, and data, typically by cultivating its own domestic AI capabilities and reducing reliance on foreign technology. Whether intentional or not, the effect of these policies is almost always protectionist in nature.³ Governments cherry-pick when American companies can freely access their markets, allowing American innovations when it suits them while shutting out U.S. competitors when it doesn’t. This protectionism fractures the collective leadership the West needs to build to create a counterweight to China.

In a vision of collective leadership, nations still compete intensely, but they also trade for mutual gain and seize opportunities for scientific, technical, and commercial collaboration that expand the base of AI knowledge. By committing to positive-sum policies—open trade, fair economic competition, and cross-border collaboration—countries can strengthen their collective position far more than any could alone, and push back against the real competitor, China, whose state-backed model relies on unfair trade and market-distorting practices.

The problem is that U.S. policy today does not convey this vision. To many partners, the offer to partner sounds like a binary choice between being a customer of the United States or China. That framing reduces them to clients in someone else’s system rather than partners in building shared leadership. Unsurprisingly, countries boxed into this binary reach for sovereignty as their way of carving out influence, erecting barriers, localizing infrastructure, and duplicating capacity. The result is not a whole greater than the sum of its parts, but a scattering of isolated efforts, each weaker on its own, and all weaker together, than they would be as a collective.

If the United States wants to win the AI race, it will have to change its pitch to partner countries. The offer must be clear: a partnership with the United States is an opportunity to have a genuine stake in building a global AI ecosystem in which they can build products and services, capture value, and create jobs. But that opportunity should come with conditions. They can set the rules for how AI works within their borders, but they cannot exclude American technology firms from their markets or preference their own domestic firms. The United States should welcome other countries to join the American AI Exports Program so long as they commit to openness. The idea that nations can invoke “AI sovereignty” to draw on U.S. technology when convenient, while walling off their markets when not, is an offer U.S. policymakers should reject.

³ Hodan Omaar, “AI Sovereignty Makes Everyone Weaker—America Can Lead Differently,” (Center for Data Innovation, September 2025), <https://datainnovation.org/2025/09/ai-sovereignty-makes-everyone-weaker-the-us-can-lead-differently/>.



5. COMMERCE SHOULD COMMUNICATE THE STRENGTH OF ITS OFFERING THROUGH CLEAR ECONOMIC AND SECURITY BENEFITS, NOT VALUES-BASED FRAMING

Historically, U.S. engagement on AI abroad leaned heavily on normative language, asking countries to align with the United States on the basis of shared principles and responsible models of technology. The administration has clearly moved away from that approach, recognizing that in today's landscape, countries choose partners based on what they can build with them—capital, capability, reliability, and security—not on appeals to shared values. And China is already offering exactly that kind of partnership: outcome-driven, backed by financing, and tightly aligned to national ambitions. That is the standard against which countries are now comparing every other option, including those from the United States.

For the Program to be effective and credible, it should carry this posture through every aspect of its design and messaging. At times, messaging from officials has seemed to drift back into normative language. That risks diluting the Program's strategic clarity and signaling a return to an approach partners increasingly view as symbolic rather than substantive. Indeed, the Program will succeed only if it presents the United States as a dependable economic and security partner. This is what the moment demands, and it is what partners expect when choosing between the offers before them.