



December 12, 2025

Emily Davis  
Director for Public Affairs  
International Trade Administration  
U.S. Department of Commerce

Re: American AI Exports Program [Docket ID ITA-2025-0070]

Dear Ms. Davis:

The AI Integrators Council (AIIC) serves as the primary voice for leading companies working to integrate artificial intelligence into systems, platforms, and applications. The AIIC welcomes the opportunity to provide input to the International Trade Administration (ITA) under the Department of Commerce on its request for information to advance US artificial intelligence exports.

The federal government's American AI Exports Program, established under Executive Order 14320, represents a critical step in safeguarding and extending US leadership in artificial intelligence while strengthening global technological partnerships built on trust and transparency. We support ITA's efforts to expand on exporting the US AI technology stack. We believe that successful exports require not only technical innovation but also robust integration, deployment, and governance practices—areas where AI integrators add unique value.

By promoting the export of comprehensive, full-stack AI technology packages, from hardware and data infrastructure to software and applications, this initiative ensures that America's innovations set the global standard rather than ceding that ground to adversarial nations. This policy not only aligns economic growth with national security, but also creates new opportunities for US companies to expand into strategic markets with federal support, coordinated through agencies like Commerce, State, Energy, and OSTP. We recommend that the Program explicitly include the integration and services layer as part of the "full-stack."

An AI integrator should be defined as an entity that utilizes foundation models created by third parties to create AI systems and product features without substantially modifying the underlying AI model(s). The role of an AI integrator is distinct from the roles of both developer [of foundational models] and deployer [of AI systems]. In the AI stack, integrators largely occupy the middle layer within the category of software/applications, taking third-party foundation models and transforming them into usable AI systems and product features that deployers present to end-users.

## RFI Questionnaire Responses

### Section A, Question 1

*Q: Identify and describe who you represent and explain why you are providing input to this RFI. As appropriate, provide information about your company or organization that might be relevant, such as revenue, employee count, and key suppliers and customers.*

A: In order for American AI innovation to flourish, it is crucial for federal AI policy to fully recognize all players of the AI value chain, in particular the role of AI integrators. The AIIC was created to educate policymakers and other essential stakeholders about the complexity of roles, responsibilities, and relationships across the AI ecosystem and to advocate for policies based on an accurate understanding of this ecosystem. We are comprised of companies at the forefront of applying AI to productive economic uses for enterprises, including Alteryx, Atlassian, Box, Cognizant, Docusign, Peraton, SAIC, Salesforce, ServiceNow, and Twilio. Our companies have a vested interest in ensuring that our products are recognized and exported as part of the full American tech stack. AI integrators offer critical value by bridging the gap between developers and deployers in order for the full benefits of AI to be realized and implemented.

### Section A, Question 2

*Q: If you represent a company or organization that is a potential American AI exporter, what goods or services does your company or organization offer? Furthermore, describe whether and to what extent such goods or services are manufactured, created, and developed in the United States.*

A: The companies that make up the AIIC have integral knowledge and expertise of operating in the AI technology stack, and our AI products, which are used by a range of civilian and defense agencies at all levels of government and a vast array of public and private companies. The AIIC advocates for forward-looking federal regulations on AI that recognize integrators and other actors in the AI value chain, and policy that anticipates the continuing evolution of the technology stack.

### Section B, Question 4

*Q: Should the components of the AI-technology stack described in E.O. 14320 be clarified or expanded upon? If so, what additional items should be included or what clarification should be provided?*

A: In implementing Executive Order 14320, it is essential that AI integrators are explicitly recognized as a vital component of the US AI value chain, as they are integral to the innovation of the US AI stack. AI integrators serve as the connective tissue within the full-stack AI technology package, ensuring that US-manufactured hardware, secure data pipelines, advanced models, and sector-specific applications function cohesively and responsibly.

At present, AI integrators provide technical and operational expertise that enable the practical and value-added deployment of American AI systems across diverse industries and geographies, translating innovation into real-world capability while upholding US security and export compliance standards. By acknowledging the participation of US-based AI integrators within the American AI Exports Program, the federal government can ensure continued reliability, scalability, and trustworthiness of exported AI solutions, reinforcing the strategic objective of preserving US leadership throughout the entire AI ecosystem. We recommend that ITA explicitly recognize AI integrators in the American AI Exports Program.

From the integrator perspective, the biggest barriers to exporting AI services are crossborder data restrictions, talent mobility and visa constraints, inconsistent global standards, and reliance on hyperscaler infrastructure. We recommend the Program promote model contractual clauses for AI data transfers, mutual recognition of compliance certifications, targeted visa pathways for AI talent, and multicloud interoperability requirements to reduce friction and enable scalable, compliant deployments. Additionally, developers should meet model transparency and safety testing obligations, integrators should provide integration documentation, risk assessments, and deployment readiness artifacts, and deployers should implement end use controls, oversight, and monitoring.

#### Section C, Question 7

*Q: Generally, if guidance were provided on how consortia should be formed and governed, what should be included in that guidance?*

A: As the Department of Commerce develops guidance for the American AI Exports Program, it is imperative that the consortium framework fully recognizes *all* essential participants in the US AI value chain, including AI integrators.

Effective export packages depend not only on innovation at the component level, such as hardware, data infrastructure, and model development, but also on the coordination, integration, and operationalization of these technologies into cohesive, secure, and export-ready systems.

AI integrators play a critical role in bridging these layers, ensuring interoperability, compliance with US export controls, and sustained performance, trustworthiness, and security across diverse international environments. Therefore, program guidance should explicitly encourage consortia to include AI integrators alongside hardware manufacturers, cloud service providers, data specialists, and application engineers to ensure that selected export packages reflect the full strength and interdependence of the American AI technology stack.

Accordingly, we recommend that consortia be structured so integrators have a central role in shaping decisions on topics such as system architecture, security, compliance, localization, and ongoing support after export. The ITA should promote the use of unified frameworks and guidelines that enable all members to contribute to and uphold high standards throughout the

consortium. Readiness should be evaluated using clear, practical benchmarks, such as deployment timelines, ease of auditing, and operational reliability, to ensure that every participant's expertise is reflected in the consortium's outcomes.

#### Section I. Question 27

*Q: To what extent, and how, should the Federal Government seek to use the Program to promote the adoption of high-quality technical standards abroad?*

A: In order to best promote the adoption of high-quality technical standards abroad, the Federal Government should seek to update AI procurement policies to actively implement and scale the use of American AI technologies across agencies.

To advance US leadership in AI deployment, the federal government should continue to build on its efforts to create AI application marketplaces, like [USAI.gov](https://usai.gov), that enables streamlined access to built-for-purpose, American-developed AI platforms that can be rapidly tailored to agency missions. This modernization effort should include phased contracting models that reward iterative progress and regulatory sandbox frameworks that allow controlled testing without triggering full recertification. By aligning procurement practices with the operational realities of AI, the government can accelerate domestic innovation, global export efforts, strengthen the American AI industrial base, and ensure that federal missions are powered by trusted, US-origin AI technologies.

We further recommend harmonized technical standards and mutual recognition of certifications to reduce crossjurisdictional friction, and procurement requirements that include transparency artifacts maintained by integrators, such as integration documentation, interface controls, data governance plans, and risk registers that travel with the export package to support downstream oversight.

#### **Conclusion**

We encourage the Administration's continued work on regulation and guidance to support AI innovation in the US technology stack. As ITA seeks to advance US AI exports, the AIIC urges the ITA to recognize AI integrators as a distinct and indispensable part of the AI value chain and to ensure that future regulations and guidance reflect their critical role. Doing so will strengthen policy clarity, foster responsible innovation, and empower the companies driving AI adoption across industries. Thank you for your leadership on these critical issues. We look forward to continued collaboration as you work to promote AI innovation.

Sincerely,

Wes McClelland  
Executive Director  
AI Integrators Council