Global Data Alliance Comments on the Department of Commerce International Trade Administration's Request for Information on the American AI Export Program

December 11, 2025

The Global Data Alliance ("GDA")[1] respectfully submits the following comments regarding the International Trade Administration's (ITA) Request for Information on the AI Export Program.

The GDA is a cross-industry coalition of companies committed to high standards of data responsibility and to the trusted, secure, and interoperable movement of data across borders. The GDA supports policies that help instill trust in the digital economy without imposing undue cross-border data restrictions or localization requirements that undermine cybersecurity, innovation, economic development, and international trade. GDA members support billions of dollars of investment and millions of jobs in the United States.

GDA members share ITA's objective of promoting leadership in artificial intelligence (AI) as well as US exports of AI-related products and services. GDA members operate in every major economic sector, including manufacturing, financial services, logistics, health, energy, and technology.

As ITA considers how to operationalize the program to achieve our shared objective, GDA respectfully submits that ITA should consider how to ensure that the program is both far-reaching – extending economic benefits to many different sectors of the US economy – and durable and long-lasting – paying dividends to US exporters and technology leadership for years to come. To ensure breadth of impact, we urge ITA to develop an inclusive, comprehensive, and flexible approach that promotes an array of AI-related exporter business interests. To ensure that the program's benefits outlast the signature date on any particular sales contract, we urge ITA to evaluate how to set the conditions for long-term success. In other words, ITA should also account for the broader landscape in which these global commercial transactions occur and address overarching policy concerns affecting the AI ecosystem in AI export program country markets.

We urge ITA to take steps to ensure that AI export program countries offer US exporters an operating environment that is conducive to the successful development and deployment of AI across many different use cases and business sectors. This includes ensuring that AI export program countries do not impose improper restrictions on cross-border data transfers or data localization mandates. Given that AI systems depend upon the aggregation and computational analysis of large volumes of data from around the world, **AI exports can only succeed – as a functional, operational, and commercial matter – if data is able to flow seamlessly between servers and network infrastructure in AI export program partner markets and in the United States**.

The AI export program should enshrine principles endorsed by the partner country as a means of building trust and reflecting its support for US legal and security expectations that are integral to the United States' agreement to export US AI exports. Such principles could be reflected in a Joint Statement of Principles, a Memorandum of Understanding ("MoU"), or even a set of contractual terms and conditions.

Such commitments should include, at a minimum, expectations that partner economies will refrain from imposing data localization mandates and undue data transfer restrictions that would effectively impede use of a US-based AI Stack, as well as commitments to promote better alignment and interoperability on technology security, cybersecurity, and related controls and best practices. Similarly, the commitments should also promote alignment of the partner country's export controls and investment controls policies with those of the United States.

[1] For more information on the Global Data Alliance, please see: https://www.globaldataalliance.org/

This approach will help establish AI export program participants as preferred long-term partners in sectors including the automotive, aerospace, agriculture, finance, insurance, health, media, software, telecommunications, and transportation sectors.

Unfortunately, if a foreign country maintains a data localization requirement or restricts data transfers, thus impeding the ability of US-based AI tools to access and analyze data from that country, that country will find that its purchases of US AI tech stack technologies would significantly underperform, or even lack overall functionality. US AI export program partners will simply not be able to realize AI's full potential if they isolate themselves from data exchange and alignment with the United States.

For all of these reasons, we strongly urge ITA to develop streamlined Joint Statement, MOU, or contractual commitments that underscore the importance of seamless and responsible data transfers to AI development and deployment. Such commitments will help ensure that the AI export program promotes important US strategic objectives – namely greater interoperability, integration, and interdependence. In short, such commitments comprise the legal foundation of an enduring US-led AI ecosystem that strengthens US economic and national security interests over the long term.

GDA members would welcome the opportunity to meet with your team to discuss this matter. Please reach out if you have any questions or comments.

Sincerely yours,

Joseph P. Whitlock
Executive Director
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Annex I

Why Shared Principles on Cross-Border Data are Essential to the Success of the AI Export Program

The US AI ecosystem is inherently global. Every major AI breakthrough depends not only on domestic innovation but also on real-time access to know-how, data, and information from around the world. When allied partners seek to develop AI in their markets, this same principle also applies in reverse. In sum, without the ability to seamlessly participate in transnational digital networks and the broader AI development ecosystem, the United States risks losing its edge in AI development and deployment.

It is widely understood that cross-border data transfers are integral to the effective deployment of AI solutions to enhance economic growth, help advance scientific progress, promote cutting-edge R&D, protect networks and information systems, and solve pressing national challenges. Science- and innovation-oriented organizations consistently emphasize that computational analytic capabilities depend on data drawn from globally distributed sources.

From developing predictive models to deploying AI-based systems, these systems are “trained” by ingesting large, heterogeneous data sets that reveal latent patterns, relationships, and trends. These models then generate predictions when new data are introduced. Because training data frequently originate from geographically dispersed sources, it is imperative to ensure that data can move seamlessly and securely across borders.

Regrettably, cross-border data barriers are prevalent and increasing rapidly in many of the markets that ITA seeks to engage via the AI export program. In fact, such barriers have increased by over 500% in the Asia-Pacific alone in just the last few years. Such restrictions have a direct impact on US-based AI development and innovation, because they fragment networks, reduce dataset diversity, inhibit the flow of cyber threat data, and increase the risk of error or other unintended outcomes. A robust US engagement agenda with AI export program country partners to remove such barriers is critical to the future health and resilience of AI development in the United States.

Conversely, when AI export program country partners impose cross-border data transfer restrictions or data localization mandates, they severely handicap their own ability to deploy and benefit from US AI exports. Whether US exports take the form of GPUs or AI models (on the one hand), or AI-enabled automotive, finance, health, or media-related exports (on the other), AI export program country partners that block data flows or mandate localization will simply not be able to unlock the full transformative potential of those US AI exports.

Annex II

Illustrative Use Cases for AI and Cross-Border Data

This Annex contains illustrative use cases for AI in several sectoral contexts in which GDA members are active.

A. AI-Grounded Healthcare, Medical Technology, and Biopharmaceutical R&D

AI is transforming innovation across therapeutics, diagnostics, devices, imaging, and monitoring systems. These AI systems depend on access to diverse datasets from around the world—genomic databases, imaging archives, clinical trial outcomes, sensor data from devices, diagnostic assay results, population health studies, and phenotypic registries.

- Diagnostic imaging, surgical video and algorithmic interpretation: AI models built from imaging datasets (MRI, CT, PET, X-ray) and surgical video drawn from multiple countries improve generalizability and training, reduce error rates, and adapt to diverse patient populations.
- Device calibration and optimization: Smart devices, wearables, and implantables generate streams of sensor data. AI models refined with global datasets improve accuracy across different physiological and environmental conditions.
- Assay and diagnostic development: AI models trained on biomarker, proteomic, and genomic data sourced internationally detect early disease signatures with greater robustness.
- In silico trials and simulations: AI-based modeling of drug-device interactions or device performance is strengthened by integrating global performance datasets.
- Real-world evidence and regulatory readiness: AI-driven analysis of international registries and post-market device data improves regulatory submissions and post-market safety monitoring.

Restricting cross-border flows—through localization mandates, vague data export rules, or restrictive transfer regimes—directly constrains AI innovation, slows time to market, degrades accuracy, and risks introducing unintended error or outcomes into AI-driven solutions.

B. AI and Agriculture & Environmental Predictive Systems

AI models in environmental science and agricultural planning rely on integrating global geospatial, remote sensing, weather, soil, hydrological, and satellite datasets.

- Climate and extreme event forecasting: Global satellite and atmospheric data improve predictive accuracy for droughts, floods, and heat waves.
- Precision agriculture: AI integrates soil, crop, and climate data from multiple regions to optimize farming practices and resource use.
- Pest and disease monitoring: AI trained on global datasets enables early detection of outbreaks and rapid cross-border response.
- Carbon and ecosystem modeling: AI integrates international land and forestry data to improve carbon accounting and inform climate policy.
- Cross-regional learning: AI trained on data from one agroecological zone can suggest adaptive innovations in another.

Without open global flows, models become parochial, less accurate, and less resilient.

C. AI and Financial- and Cyber-security

Cyberattacks and fraudulent financial activity are inherently transnational. AI-driven cybersecurity tools are necessary to meet this challenge, but such tools are only as effective as the global data available to train them.

- Threat intelligence: Malicious actors reuse infrastructure globally. AI trained on attack patterns abroad can recognize emerging variants before they reach the U.S.
- Fraud detection: AI that integrates diverse international transaction data detects anomalies more effectively than models trained on domestic-only inputs.

- Critical infrastructure defense: Energy, telecom, and financial networks require AI-powered cybersecurity tools that are informed by global threat data.
- Supply chain security: AI detection of anomalous behavior in software or hardware requires global inputs.

Cybersecurity is global by necessity. Restrictions on cross-border data flows undermine resilience, hurt national security, and weaken AI-enabled protection.

Annex III

Model Joint Statement Text

GDA recommends that the following paragraphs be embedded in any agreement or announcement regarding American AI exports. This text is modeled on negotiations undertaken in 2018 in the first Trump Administration, which resulted in similar text in the United States – Singapore Joint Statement on Financial Services Data Connectivity.

> [COUNTRY] recognizes that the ability to aggregate, store, process, and transmit data across borders is critical to the development and deployment of artificial intelligence (AI) to improve the economic and national security of both [COUNTRY] and the United States. The expanding use of data in AI development and deployment offers a range of benefits, including greater AI accuracy and reliability, improved security, enhanced risk management capabilities, and increased efficiency and economic opportunity. [COUNTRY] is committed to working with the United States to promote AI that supports our shared economic and national security interest in an integrated, interdependent, and interoperable AI ecosystem.
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> To fulfill these shared objectives, [COUNTRY] agrees to:
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> (a) refrain from measures that discriminate against US digital services or US products distributed digitally;
> (b) refrain from measures that require from covered person to use or locate computing facilities in [COUNTRY'S] territory as a condition for conducting business in that territory;
> (c) enable the cross-border transfer of data by electronic means across trusted borders, with appropriate protections, for the conduct of business; and
> (d) cooperate with the United States with a view to restricting transactions of its nationals with individuals and entities included in the U.S. Department of Commerce Bureau of Industry and Security Entity List (Supplement 4 of Part 744 of the Export Administration Regulations), as well as the U.S. Department of the Treasury Office of Foreign Assets Control Lists of Specially Designated Nationals and Blocked Persons List (SDN List) and the Non-SDN Consolidated Sanctions List.