November 26th, 2025

Submitted via Regulations.gov

William Kimmitt
Under Secretary for International Trade, United States Department of Commerce.
International Trade Administration, U.S. Department of Commerce.

Re: Notice of Request for Information; American AI Exports Program (Docket No. 251023-0165)

Dear Under Secretary Kimmit,

On behalf of millions, Americans for Prosperity, with activists across all 50 states, we write to express our strong support regarding the potential of AI exports.

International trade plays a critical role in the modern global economy, offering multiple advantages to businesses and nations alike. From higher compensation rates to fostering innovation, trade enables economic growth, boosts productivity, and creates opportunities for companies to scale and innovate.

Some of the economic benefits of trade are higher compensations for workers in exporting industries. Employees in export-driven sectors earn, on average, 18% more than their counterparts in non-exporting industries. This wage premium reflects the added value and higher productivity of businesses engaged in international markets. Also contrary to common assumptions, small and medium-sized enterprises (SMEs) account for a substantial share of global exports. Approximately 98% of companies involved in exporting are SMEs, highlighting the importance of trade for businesses of all sizes.[i]
Economic research consistently shows a positive link between trade openness and economic prosperity. The OECD reports that a 10% increase in a country's openness to trade is associated with a 4% increase in income per capita. Also engaging in international trade fosters innovation and R&D investments. Exporting firms often need to innovate to stay competitive, which drives investment in new technologies, processes, and products.[ii]

The tech industry, particularly in areas like AI and semiconductor manufacturing, benefits greatly from global markets. As new technologies are developed and adopted, they generate a "network effect," where the value of the product increases as more users or companies adopt it. Today, tech giants value of a product or service increases as more users participate, creating an incentive for additional users to join. This positive feedback loop is not confined solely to user networks. It can also operate within platforms that connect users with various providers or suppliers, potentially producing even stronger "winner-take-all" outcomes and more significant economic effects.[iii]

With significant investments being made in onshoring production and scaling technological capabilities, such as semiconductor manufacturing, TSMC investment in Arizona has expanded from $12 billion to $165 billion.[iv] The massive costs of building production facilities, particularly in high-tech industries, require these businesses to look beyond local markets. Expanding into global markets helps companies achieve the economies of scale necessary to make their operations profitable and sustainable.

While the benefits of trade are clear, exporting is not an immediate process. It typically takes 12 to 24 months for companies to achieve meaningful success in international markets.[v] Building strong relationships with customers, adapting to local market conditions, and navigating regulatory requirements all take time. Competition is fierce, and consolidating a loyal customer base abroad requires strategic planning.

In sectors like AI and semiconductors, maintaining a technological edge is crucial. The companies that led the tech world in the 1990s are very different from the current market leaders. To remain competitive, firms must continue to innovate and capitalize on their technological advantages while they still hold a leading position. Any missed opportunity for export sales could result in a long-term revenue loss, which is particularly damaging in industries that rely heavily on reinvestment in R&D.

Also, it is important to mention that, although the overall volume of trade has continued to rise globally, its expansion relative to global GDP has slowed since the 2008–2009 financial crisis. From 1995 to 2007, trade grew at roughly twice the pace of world GDP, but its share of global GDP reached a high of about 25% in 2008 and has either remained flat or declined thereafter, settling into a plateau by 2024[vi]. In an environment where trade growth is stagnating, ensuring access to international markets and preserving open channels for exports becomes increasingly important.

The reduction in competition can negatively impact investment. When companies feel less competitive pressure, they may reduce investments in innovation and development, which can stifle long-term growth.[vii]

There is a fundamental difference in how China and the U.S. are approaching the global expansion of AI. In Washington, the discussion consistently centers on how AI should be limited or control the export, a stance radically different from Xi's, who has described China's technology as "a public good for the international community".[viii]

Power availability is the key constraint on compute for America's leading AI firms. However, updating legislation and developing new infrastructure takes time. While this is necessary, it's also crucial to work with allies' countries who have excess energy capacity and can help accelerate AI deployment.

Regarding countries for AI expansion, the U.S. needs to adopt a global approach rather than focus so narrowly on China's access; China's development of AI and the limitations it faces have, in fact, fostered its innovation.

Arab countries have shown strong interest in deploying American technology, such as Saudi Arabia's HUMAIN project and the UAE's Group 42, while also expressing frustration with U.S. export controls.[ix] At the same time, these swing states are already using Chinese technology and will likely try to maintain a balance rather than fully committing to one ecosystem over the other for broad deployment.

Within the neighborhood, Argentina emerges as a key strategic country, thanks to its abundant energy resources, including some of the world's largest shale-oil and shale-gas deposits, giving Argentina the world's fourth-largest shale oil and second-largest shale gas prospective resources.[x]

Beyond fossil fuels, Argentina also has a long track record in nuclear energy, including the development of small modular reactors such as the CAREM prototype, and more recently the ACR-300 concept, for which INVAP secured a U.S. patent.[xi]

On the regulatory side, Argentina has recently enacted a legal framework designed to attract and protect foreign investment over the long term. The flagship policy is the Incentive Regime for Large Investments (RIGI)[xii], which offers a 30-year legal and fiscal stability guarantee for qualifying large projects over $200 million. Under RIGI, investors benefit from tax breaks, customs exemptions on imports of capital goods, and profit-repatriation rules, and protections under international arbitration treaties in case of regulatory changes.

The combination of significant energy reserves, a history in nuclear power, a stable regulatory framework for foreign investment, and a geographic location distant from conflict provides Argentina with opportunities to expand U.S. technology and commercial partnerships.

In conclusion, international trade provides numerous benefits, from driving economic growth and rising incomes to fostering innovation and maintaining a technological edge. As companies look to scale and stay competitive in a rapidly changing global market, embracing export opportunities is essential. However, businesses must be prepared for the time and investment required to succeed in international markets. The future of global trade depends on strong alliances, open and fair markets, and strategic investments in technology that advance shared economic growth and U.S. competitiveness.

Sincerely,

/s/ Mario Ottero

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