American AI Exports Program Comments

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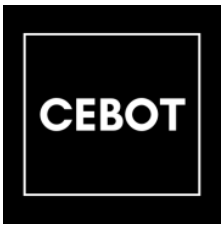

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Subject:
Response to Request for Information on the American AI Exports Program under Executive Order 14320, “Promoting the Export of the American AI Technology Stack”

American AI Exports Program Comments

Integrating Infrastructure, Workforce, and Governance to Power American AI Abroad

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Section I

Executive Summary

The Council Exchange Board of Trade submits this response to the American AI Exports Program because the United States has entered a decisive moment in global technology competition. For American AI to lead the next era of economic growth, U.S. exports must move beyond product sales and shift toward the deployment of complete, secure, and governance aligned national systems. These systems must combine infrastructure, data, workforce, institutions, and energy into an integrated platform capable of enabling full stack AI adoption in trusted partner countries.

CEBOT represents a national scale consortium of two hundred U.S. companies that together form a full stack AI export engine. The consortium includes manufacturers, microgrid developers, cloud and datacenter architects, AI engineering firms, packaging and industrial systems suppliers, cybersecurity companies, workforce development organizations, and governance institutions. Its Governance as a Service platform ensures transparency, compliance, export control alignment, procurement integrity, and lifecycle accountability for every component deployed abroad. This structure reflects a simple truth confirmed through a decade of field work. AI does not scale unless governance, infrastructure, and human capital advance together.

The consortium's on the ground partnerships demonstrate this reality. Through the Sokoine University of Agriculture, CEBOT is anchoring a national industrialization strategy powered by microgrids, advanced packaging systems, cold chain modernization, SME development, and AI enabled agriculture. Through the Dar es Salaam Institute of Technology, CEBOT is supporting digital public infrastructure, cloud readiness, cybersecurity modernization, and early stage datacenter deployment. In Kenya, CEBOT is working with partners to establish a youth aerospace workforce corridor that incorporates AI enabled training, digital twin simulation, and engineering apprenticeships aligned with U.S. standards. These three sites together form a multi country demonstration ecosystem that validates the full stack AI export model envisioned by the Program.

The American AI Exports Program is essential to the strategic future of the United States. It strengthens U.S. national security, expands domestic manufacturing demand, deepens global standards alignment, and provides American companies with new markets for

advanced energy, industrial, AI, and digital systems. By selecting consortia capable of integrating governance, infrastructure, financing, workforce, and AI tools into a unified architecture, the Department of Commerce can ensure that American technology becomes the backbone of emerging digital economies rather than allowing competitors to define those systems.

CEBOT is prepared to support this national mission. The consortium brings the technical capacity, governance maturity, and institutional partnerships required to deploy U.S. full stack AI systems responsibly and at scale. We stand ready to work with the Department of Commerce, federal agencies, and international partners to ensure that the American AI Exports Program delivers lasting economic, strategic, and diplomatic benefit to the United States.

Section II

Respondent Background

Q1. Organizational Identity and Purpose of Response

The Council Exchange Board of Trade represents a national consortium of more than two hundred U.S. based technology and industrial companies working together to advance American competitiveness, rebuild domestic production capacity, and accelerate national digital transformation. We are submitting this response because the American AI Exports Program aligns directly with CEBOT's mission to expand U.S. industrial throughput, strengthen domestic employment, and connect American technology firms to international markets in a manner that is governance ready, secure, and economically scalable. Our consortium's work across Africa, including institutional partnerships with universities, public agencies, industrial associations, cooperatives, and technical ministries, gives us unique visibility into the real conditions that determine whether full stack AI systems can be successfully deployed and sustained. This response reflects ten years of on the ground engagement and is informed by direct implementation experience rather than theoretical analysis.

Q2. CEBOT as a Potential American AI Exporter

CEBOT does not export a single product. Instead, the consortium exports a comprehensive AI readiness and deployment architecture that integrates American manufactured components, cloud systems, data pipelines, AI models, cybersecurity tools, power and digital infrastructure, workforce pathways, and governance frameworks. The goods and services represented by CEBOT member companies are overwhelmingly manufactured, engineered, assembled, coded, or architected in the United States. These include microgrid components, advanced packaging systems, energy storage technologies, cold chain systems, datacenter enclosures, digital identity tools, enterprise software, traceability platforms, embedded AI modules, and training systems. Each is essential to the secure and responsible export of a full stack AI system. CEBOT's structure ensures that U.S. companies can participate in export opportunities that would otherwise require large consortium capabilities beyond the reach of individual firms.

Q3. Support Needed from the American AI Exports Program

The Program can support CEBOT's export readiness in three central ways. First, by providing formal recognition to industry led consortia that operationalize full stack AI solutions in partner nations. This signals credibility to foreign governments, investors, and financial institutions. Second, by mobilizing federal financing tools that help de risk U.S. company participation in large scale infrastructure and AI readiness programs. This includes blended finance coordination between EXIM, DFC, TDA, MCC, USAID, USDA, and State Department economic diplomacy teams. Third, by aligning export guidance, standards, and compliance requirements across agencies so that U.S. companies can operate with clarity when deploying AI systems abroad. CEBOT's strongest foreign markets include East Africa, West Africa, the Caribbean, and Indo Pacific nations where U.S. aligned institutions, strong university systems, and large youth populations create high receptivity to American AI. The Program's support would enable CEBOT to deploy multi sector AI modernization at scale, expand American manufacturing demand, and deepen long term political and economic ties.

4. Why CEBOT's Perspective Is Relevant to the Program

Full stack AI exports do not succeed unless the receiving nation has the governance, infrastructure, workforce, and institutional alignment to absorb the technology. CEBOT's work has demonstrated that AI systems fail when deployed as isolated components and succeed when deployed through integrated modernization. The consortium model we are advancing offers a new pathway for the United States to compete internationally by deploying AI as part of a holistic transformation strategy rather than a technology transaction. This approach expands U.S. jobs, increases domestic manufacturing throughput, strengthens American standards leadership, and ensures that U.S. firms capture the long term value of AI enabled economic development abroad.

Section III

The AI Technology Stack

Q4. Clarifying and Expanding the AI Technology Stack Defined in E.O. 14320

The AI technology stack described in the Executive Order identifies critical layers including compute hardware, data systems, AI models, cybersecurity, and applications. Based on CEBOT's operational experience, the stack should be expanded in two ways to better reflect the real conditions required for effective adoption in foreign markets. First, a governance and institutional readiness layer is needed to ensure AI systems operate within trusted, transparent, and enforceable rules. This layer includes standards alignment, digital public infrastructure, data governance, procurement integrity, auditability, and lifecycle oversight. Second, a workforce and market enablement layer is required to ensure that local talent can operate, maintain, and extend AI systems and that SMEs, cooperatives, and public agencies can integrate AI tools into daily operations. These additions transform the AI stack from a technology perspective into a full system capable of secure and sustainable deployment.

Q5. Evaluating Each Component of the Full Stack in a Proposal

Each component of the stack should be evaluated through three lenses. The first is security, meaning alignment with United States export controls, NIST cybersecurity frameworks, and local regulatory capacity. The second is operational viability, meaning the infrastructure, market environment, and institutional governance are mature enough to support each component of the stack without interruption. The third is long term sustainability, meaning the partner country possesses the workforce, financing structures, and institutional partnerships required to operate and maintain the technology after initial deployment. This evaluation method ensures that proposals are judged not only by the quality of the technology, but by the system that receives it.

Q6. Challenges Consortia May Face When Developing Full Stack Proposals

Consortia face three principal challenges when assembling full stack AI export packages. The first challenge is integration, since compute, data pipelines, governance, and workforce systems often come from different vendors and must function coherently in real mission environments. The second challenge is sequencing, since infrastructure, policies,

training, and AI applications must be deployed in an order that reduces risk and enhances adoption. The third challenge is cross border compliance, since full stack exports must align simultaneously with United States security requirements and the regulatory frameworks of partner nations. CEBOT addresses these challenges through its Governance as a Service platform, its multi institution partnership model, and its ability to combine industrial capabilities, digital infrastructure, and AI applications into a unified architecture. This system level approach ensures that full stack AI exports strengthen American competitiveness and create the conditions for responsible and secure adoption abroad.

Section IV

Consortia Membership and Formation

Q7. Guidance for How Consortia Should Be Formed and Governed

Effective consortia for AI export must be built as systems, not vendor assemblies. The United States requires structures that integrate governance, technology, infrastructure, and workforce capacity into a unified operating architecture. Guidance should therefore require each consortium to establish a governance framework anchored in transparency, security, and lifecycle accountability. This includes a governing board with representation from U.S. technology firms, institutional partners in the receiving country, and neutral intermediary organizations capable of overseeing compliance, procurement integrity, and standards alignment. Clear decision rights, milestone based performance management, data governance requirements, and risk controls should be mandatory elements of every consortium's structure. A well governed consortium ensures that American AI is deployed responsibly, delivered effectively, and supported sustainably.

Q8a. Criteria for Determining Eligibility of Consortium Members

Consortium members should be required to meet threshold criteria in technical competence, financial integrity, and compliance readiness. Eligible entities should demonstrate proven capabilities in one or more components of the AI export stack, the ability to operate under U.S. regulatory expectations, and a verifiable commitment to transparent contracting, data protection, and security protocols. Members should also show evidence of workforce development programs or the ability to integrate into apprenticeship based talent pipelines in partner countries. These criteria ensure that the consortium is composed of technically strong and governance aligned organizations capable of long term engagement.

Q8b. Criteria for Determining Whether a Consortium Is Eligible for the Program

A consortium should meet eligibility requirements that demonstrate it can deliver the full stack of AI, infrastructure, governance, and workforce systems required for national level deployment. These requirements include a minimum number of U.S. based companies,

representation from institutions capable of absorbing AI in the receiving country, and a technical architecture that spans compute, cloud, data pipelines, cybersecurity, applications, and governance. The consortium should demonstrate the ability to deploy AI in multiple sectors such as agriculture, public services, logistics, and energy. In addition, the consortium should submit a plan for long term sustainability that includes workforce development, financing pathways, and governance continuity. These criteria ensure that selected consortia are capable of delivering high impact, scalable, and secure national modernization programs.

Q8c. Encouraging Modularity in Consortium Formation

Modularity should be encouraged because full stack AI exports require diverse expertise and must adapt to the varying degrees of readiness in partner countries. Modularity allows consortia to deploy U.S. manufactured technology, cloud services, AI tools, microgrid systems, or governance platforms as discrete modules that can be integrated into a unified ecosystem. This approach supports multiple deployment scenarios across agriculture, energy, logistics, and public sector modernization. CEBOT's model already includes modular capabilities through its twenty seven member categories and two hundred participating companies that collectively provide components of the AI stack, industrial systems, workforce programs, and governance frameworks.

Q8d. Managing Changes in Consortium Membership

Consortium membership will evolve over time as projects scale, new requirements emerge, and specialized capabilities become necessary. The Program should allow for changes in membership as long as the consortium maintains U.S. leadership, governance integrity, and continuity in technical and operational capability. A formal amendment process should be required for any membership changes, including disclosure of new entities, updates to governance charters, and proof that the new partners meet eligibility and security criteria. This ensures that consortia remain flexible while upholding the standards necessary for responsible AI export.

Q9a. Conditions for Participation of Foreign Entities

Foreign entities may participate in a consortium only under conditions that uphold the security posture of the United States and reinforce the strategic objectives of the Program. Participation should be restricted to institutions that have demonstrated trustworthiness, regulatory alignment, and transparent governance. Foreign partners should be limited to roles that support local adoption such as research universities, cooperatives, public

sector modernization agencies, and SMEs that contribute to workforce training or data generation. Participation of entities from countries of concern should be prohibited. This approach ensures that foreign participation strengthens, rather than compromises, U.S. strategic interests.

Q9b. Involving Foreign Entities in Formation of Consortia

Foreign entities should become involved through structured selection processes based on institutional capacity, strategic alignment with U.S. objectives, sector specific expertise, and demonstrated capability to absorb full stack AI systems. Universities such as the Sokoine University of Agriculture and public technology institutions such as the Dar es Salaam Institute of Technology are examples of partners with the institutional depth to support AI research, workforce development, and operational deployment. Including foreign entities in the formation stage ensures early alignment on governance, data standards, and infrastructure requirements.

Q9c. Role of Foreign Countries in Consortium Development

Foreign countries should play a role in providing enabling environments, including national strategies, regulatory commitments, workforce pipelines, and infrastructure readiness. Their role should be facilitative rather than directive, with decision making authority residing in the U.S. led consortium. Governments can support the consortium by aligning national policy priorities, ensuring regulatory compliance, and creating incentives that accelerate adoption of U.S. technology. This approach ensures that the consortium operates within a stable policy environment while maintaining American leadership and compliance with U.S. security expectations.

Q9d. Consideration of a Trusted Partner Program

A trusted partner program should be considered to formally certify foreign countries and companies that meet governance, security, and transparency standards aligned with U.S. requirements. Criteria should include adherence to data protection frameworks, alignment with export control rules, institutional capacity to absorb AI at scale, and participation in regional or global standards bodies. Benefits of trusted partner designation should include streamlined procurement, accelerated financing access, and priority consideration for multi country corridor deployments. A trusted partner program strengthens the strategic positioning of the United States by creating a network of aligned institutions capable of deploying American AI systems securely and responsibly.

Q10a. Designating a Lead Entity for Each Consortium

Each consortium should be required to designate a lead entity. The lead entity should possess the governance maturity, technical breadth, financial integrity, and institutional relationships required to coordinate multi sector AI deployments. The lead must have experience managing public private partnerships, operating across borders, ensuring compliance, and stewarding lifecycle governance. CEBOT fulfills these characteristics through its national governance architecture, its two hundred company network, and its established role as an intermediary between U.S. institutions and African partners.

Q10b. Role of the Federal Government in Consortium Formation

The Federal Government should play a supportive role by providing standards guidance, export control clarity, financing coordination, and diplomatic engagement. The Government should not manage or direct the consortium but should establish clear expectations for governance, security, and performance. Federal agencies should act as strategic partners that help align U.S. industrial capacity with foreign market opportunities. This partnership model accelerates deployment while preserving the agility and innovation of industry led consortia.

Section V

Foreign Markets

Q11. Priority Countries and Regions for American AI Exports

Africa, the Caribbean, and the Indo Pacific represent priority regions where American AI can achieve high impact, strengthen U.S. competitiveness, and generate long term geopolitical and economic alignment. These regions share three characteristics that make them strong candidates for full stack AI deployment. First, they have large youth populations that are positioned to become an AI enabled workforce. Second, they have institutions that are ready to collaborate with the United States on modernization, including universities, cooperatives, technical agencies, and national infrastructure programs. Third, they have national development agendas that align with export oriented industrialization, clean energy, digital governance, and regional integration.

CEBOT's engagement across East Africa provides a clear example of where U.S. AI exports can deliver transformational impact. Tanzania, through its Sokoine University of Agriculture partnership, has demonstrated demand for AI enabled agriculture, clean energy microgrids, packaging modernization, and digital supply chain systems. Similarly, the proposed collaboration with the Dar es Salaam Institute of Technology positions Tanzania to lead in AI enabled public sector modernization, data governance, and early stage datacenter deployment. Kenya, through its interest in spaceport and aerospace workforce development, illustrates demand for AI enabled youth upskilling and next generation industrial careers. These environments represent high potential markets where American technology can scale responsibly.

Q12. Tradeoffs Between Country Specific and Regional Export Strategies

Consortia will encounter tradeoffs when prioritizing individual countries versus regional blocs. Country specific strategies allow deeper alignment with national development plans, tighter governance integration, and more reliable adoption pathways. They also enable demonstration sites that prove the efficacy of U.S. AI systems in real economic environments. Regional strategies, such as those associated with the African Continental Free Trade Area, unlock larger market sizes, create cross border supply chains, and expand the strategic footprint of American standards and technology.

CEBOT's approach acknowledges both pathways. Deployments anchored in institutions like SUA or DIT serve as national demonstration hubs. These hubs then connect to regional corridors such as the East African logistics belt or the emerging aerospace training ecosystem in Kenya. By balancing national and regional strategies, U.S. consortia can maximize adoption efficiency, expand market reach, and ensure long term interoperability.

Q13. Factors and Criteria for Evaluating Priority Markets

Priority markets should be evaluated using readiness criteria that reflect the conditions necessary for full stack AI deployment. These criteria fall into five categories. The first is governance readiness, which includes institutional transparency, digital public infrastructure, regulatory capacity, and alignment with U.S. security expectations. The second is infrastructure readiness, including power reliability, datacenter potential, logistics capability, and microgrid feasibility. The third is workforce readiness, which includes university and technical pipeline depth, youth demographics, and national training capacity. The fourth is economic alignment, meaning the presence of industries capable of absorbing AI such as agriculture, manufacturing, logistics, and public administration. The fifth is regional integration, meaning the country's ability to anchor multi country corridors or serve as a hub for broader deployment.

CEBOT's field assessments in Tanzania and Kenya show strong alignment with these criteria. Tanzania has a clear agricultural modernization agenda that aligns with full stack AI deployment, including clean energy microgrids powering industrial parks, national value addition strategies, and a university led governance model through SUA. Kenya demonstrates readiness for aerospace aligned youth development, AI enabled manufacturing, and regional datacenter expansion. These use cases illustrate how CEBOT evaluates priority markets and why U.S. AI exports can achieve sustained success in these environments.

Section VI

Business and Operational Models

Q14. Business, Operational, and Ownership Models the Government Should Prioritize

The Government should prioritize business and operational models that integrate infrastructure, governance, AI applications, workforce development, and financing into a unified system. In practice, this means selecting consortia capable of deploying multi layer modernization programs rather than isolated AI products. The most effective models include Special Purpose Vehicles for governance, industrial infrastructure, and data systems, combined with university led workforce programs and U.S. based technology partners. These structures ensure continuity, accountability, and lifecycle stewardship.

CEBOT's architecture is built around this approach. The Governance SPV provides contract integrity, compliance alignment, procurement oversight, standards governance, and milestone based financing. The Infrastructure SPVs support microgrid powered industrial parks, cold chain capacity, packaging ecosystems, and datacenter deployment aligned with U.S. technology partners. The AI Deployment SPVs support applications across agriculture, logistics, public services, space workforce development, and SME enablement. This multi SPV approach ensures stable ownership, reduces investor risk, and enables long term expansion across sectors.

Q15. Documentation Demonstrating Who Builds, Owns, and Operates Infrastructure

Consortia should provide documentation that clearly establishes ownership, operational responsibility, and governance oversight. Documentation should include SPV charters, shareholder agreements, vendor and equipment contracts, microgrid development plans, datacenter site agreements, university governance commitments, and long term maintenance contracts. These documents should demonstrate how American firms, local institutions, and international partners are integrated into a coherent operational model.

CEBOT provides all required documentation through its Governance as a Service platform, which standardizes how microgrids, industrial parks, packaging lines, cold chain hubs, and datacenter modules are contracted and monitored. This platform ensures that all

operational entities operate under transparent and auditable structures. It also ensures that U.S. export control considerations, cybersecurity requirements, and lifecycle integrity are embedded from the beginning.

Q16. Requirements for Consortium Partnerships with Non Traditional Infrastructure Entities

Many critical infrastructure partners do not originate from the AI sector. These include microgrid developers, cold chain operators, packaging manufacturers, logistics providers, and regional universities. Consortia should require such partners to meet governance, security, and transparency standards equivalent to those of core AI technology providers. This includes compliance with NIST cybersecurity frameworks, data governance protocols, export control rules, financial transparency requirements, and university or cooperative based workforce programs.

CEBOT's model integrates these non traditional partners into a controlled and secure environment. For example, in Tanzania the microgrid powered industrial parks and packaging Mega Centers are operated by SPVs that adhere to U.S. aligned standards. The National Packaging Innovation Center is jointly governed by SUA and U.S. technology partners under transparent oversight. Similarly, the DIT collaboration integrates public sector infrastructure into secure digital frameworks. This demonstrates how a consortium can responsibly integrate infrastructure providers while maintaining system integrity.

Q17. How the Program Should Treat Various Ownership and Operational Models

The Program should acknowledge that ownership and operational models vary based on sector and readiness. Microgrids may be owned by SPVs with public sector participation. Datacenters may require hybrid ownership models combining U.S. technology partners and local institutions. Packaging and cold chain systems may be owned by cooperatives supported by universities. The key requirement should be that all ownership models operate within transparent governance structures with clear lines of accountability and that U.S. firms maintain control over security sensitive components.

CEBOT's model demonstrates this in practice. Microgrids are delivered through phased SPVs aligned with DOE policy. Datacenters are deployed through hybrid models that secure American technology leadership while enabling local participation. Packaging, SME manufacturing, and logistics systems follow cooperative aligned governance anchored in

university oversight. These models create long term stability and strengthen U.S. strategic influence.

Q18. Business and Operational Models that Support AI Deployment at Scale

To deploy AI at national scale, consortia need models that integrate infrastructure, workforce, governance, and financing. CEBOT's three use cases demonstrate how such models function. The SUA industrialization program integrates microgrids, packaging innovation, SME clusters, cold chain systems, and AI enabled agriculture into a unified national strategy. The DIT collaboration proposes a public sector modernization pathway supported by early datacenter deployment and university based applied research. The Kenya spaceport workforce corridor illustrates how AI can support aerospace readiness, youth employment, and regional innovation clusters. These use cases illustrate how business and operational models must align with national priorities, create workforce pipelines, and enable U.S. companies to scale across multiple sectors.

Section VII

Federal Support Requirements and U.S. Government Alignment

Q17. Federal Support Mechanisms Most Useful to Consortia

The American AI Exports Program can dramatically expand U.S. competitiveness by mobilizing federal tools that reduce risk, accelerate deployment, and create predictable pathways for U.S. companies to operate in foreign markets. The most critical mechanisms include export financing, political risk mitigation, feasibility support, and regulatory coordination across agencies.

Export financing from EXIM enables U.S. companies to provide equipment such as microgrids, packaging lines, datacenter modules, AI servers, and workforce training systems that would otherwise be difficult for foreign buyers to procure. Political risk insurance and blended finance from the Development Finance Corporation protect U.S. companies against geopolitical volatility while enabling long term infrastructure investments. Feasibility studies and pilot funding from the U.S. Trade and Development Agency support early stage deployments that validate American technology in real operating environments.

Regulatory guidance from the Department of Commerce, the State Department, and the interagency team is equally important because it provides clarity on trade compliance, data governance, and export controls. In CEBOT's experience, consistent interagency guidance reduces delays in project execution and increases the confidence of U.S. manufacturers engaging in full stack AI exports.

Collectively, these federal tools ensure that American companies can scale internationally with the confidence that their investments and intellectual property are protected.

Q17a. Additional Federal Support Mechanisms Needed

Beyond the tools already identified, two new forms of support would significantly enhance full stack AI export success.
First, the Program should consider a dedicated AI Readiness Support Fund that provides grants to trusted foreign institutions for regulatory alignment, workforce training, data

governance, and digital public infrastructure. These are essential components of AI deployment that local governments often cannot fund independently.
Second, the Program should encourage the development of AI Standards and Regulatory Alignment Missions led by NIST, Commerce, and USAID to accelerate digital governance maturity in partner nations. These missions would prepare local markets to adopt U.S. technology responsibly and ensure maximum interoperability with American systems.

Q17b. Adjustments to Federal Mechanisms to Support Full Stack Exports

Federal support mechanisms must reflect the reality that AI is not a single product export. Full stack AI deployments require infrastructure, energy, data, governance, and workforce systems operating in synchrony. For this reason, several adjustments are recommended:

Federal financing tools should explicitly support microgrids, cold chain systems, datacenters, digital identity platforms, packaging innovation centers, and national AI workforce programs, not just technology "products".
Export licensing should be streamlined for modular AI components when deployed inside governance aligned consortia.
Political risk insurance products should be expanded to support cooperative governed SME clusters, university led research hubs, and regional innovation corridors.
These adjustments ensure that U.S. companies can participate in complex architecture level deployments that define the future of AI enabled development.

Q18. Requirements Consortia Should Meet to Gain Access to Federal Support

Consortia receiving federal support should meet requirements that reflect the strategic importance of the Program. First, they should demonstrate transparent governance and compliance maturity, including adherence to NIST AI standards, U.S. export controls, and federal cybersecurity frameworks. Second, they should show evidence of multi sector capability, including infrastructure, datacenters, AI applications, SME development, and workforce enablement. Third, they should provide documentation of local institutional partnerships that support long term sustainability, such as universities, public sector agencies, cooperatives, and industrial parks. Fourth, they should have a clear workforce strategy that supports U.S. jobs, increases U.S. manufacturing demand, and builds technical capacity in partner nations.

CEBOT's consortium model satisfies each of these requirements. Its Governance as a Service platform ensures transparency and contract integrity. Its two hundred member companies span all components of the full stack, including microgrids, industrial

packaging, datacenter modules, AI engineering, manufacturing, and digital public infrastructure. Its partnerships with institutions such as SUA, DIT, and Kenya's emerging aerospace corridor demonstrate the ability to operationalize U.S. AI systems in complex environments. This multi dimensional capability makes CEBOT a strong candidate for federal support and positions the United States to lead AI deployment across high potential global markets.

Section VIII

National Security Regulations

Q19. Ensuring Compliance with Export Controls, Outbound Investment Rules, and National Security Policies

Successful deployment of full stack AI systems abroad requires a disciplined compliance architecture that protects U.S. national security while enabling strategic technology leadership. Consortia must demonstrate the ability to maintain continuous alignment with export controls, including the Export Administration Regulations, end user screening, U.S. persons rules, outbound investment restrictions, and national security directives governing advanced compute, data infrastructure, and dual use technologies.

CEBOT's Governance as a Service platform operationalizes compliance through identity verified contracting, supply chain traceability, security vetting of institutional partners, milestone based deployment, and real time auditability of infrastructure and data systems. This ensures that U.S. technology, equipment, and AI systems are deployed only within trusted environments that meet U.S. security thresholds. The platform integrates NIST standards, BIS guidance, and zero trust principles into every deployment stage, from microgrid construction to datacenter commissioning and AI model integration.

This approach protects American intellectual property, prevents unauthorized technology transfer, and strengthens national security across both civilian and strategic sectors.

Q20. Advancing U.S. AI Exports While Reducing Dependence on Technologies from Countries of Concern

The Program can expand U.S. technology leadership by exporting end to end AI systems that provide partner nations with viable alternatives to technologies offered by competitors. The key to reducing dependency is to deploy AI as part of a larger modernization ecosystem that strengthens local institutions, builds energy and datacenter capacity, scales workforce pipelines, and aligns regulatory systems with American standards.

CEBOT's field work demonstrates why this matters. In Tanzania, the integrated microgrid industrial park and packaging innovation program creates a foundation for U.S. manufactured equipment and AI tools to become the backbone of agricultural and industrial modernization. In the DIT collaboration, early stage datacenter deployment aligned with American governance frameworks positions Tanzania to adopt U.S. cloud, cybersecurity, and digital identity systems. In Kenya, the AI enabled youth-spaceport workforce corridor creates a pipeline of aerospace aligned talent trained on U.S. tools and standards.

These deployments not only expand American economic influence but also diminish the allure and accessibility of adversarial technologies. They create trusted corridors where U.S. technology becomes the default operating standard.

Q21. Additional Factors that Maximize National Security Benefits for the United States

Three additional factors are essential to maximizing national security benefits for the United States. First, AI exports must create pathways for American companies to anchor critical digital and energy infrastructure abroad, including microgrids, datacenters, packaging innovation hubs, logistics systems, and digital public infrastructure. These assets serve as strategic footholds that align foreign markets with U.S. technology ecosystems.

Second, AI exports should be tied to workforce development programs that cultivate long term alignment with U.S. standards. Training fifty thousand Tanzanian youth through SUA's agriculture and industrial programs or building aerospace talent pipelines in Kenya strengthens U.S. influence for decades.

Third, AI deployments must reinforce U.S. diplomatic objectives. Multi country corridors, such as the East African logistics belt or future aerospace and satellite ecosystems, can become strategic alliances anchored in shared standards, secure data systems, and interoperable U.S. technology.

CEBOT's architecture reflects all three factors. It deploys AI within governance aligned corridors powered by U.S. microgrid, datacenter, packaging, and logistics technologies. It builds workforce and institutional capacity that aligns foreign markets with U.S. innovation. It establishes multilateral technical corridors that enhance U.S. diplomatic and economic influence. This strengthens national security, expands American competitiveness, and ensures that U.S. leadership defines the global AI future.

Section IX

Evaluating Proposals

Q22. Factors the Department Should Use to Evaluate the Relative Merits of a Consortium's Proposal

Evaluation should focus on whether a consortium can deliver a complete and secure architecture for national level AI deployment rather than isolated technological components. Four factors are essential.

First, governance maturity, including transparent decision making, lifecycle stewardship, NIST aligned standards, and compliance with export controls, cybersecurity requirements, and procurement integrity rules.

Second, full stack capability, meaning the consortium can integrate compute, cloud, data pipelines, microgrids, packaging infrastructure, datacenters, applications, and workforce systems into a coherent deployment model.

Third, institutional readiness, meaning the consortium has credible partnerships with universities, public agencies, cooperatives, and private sector actors in the receiving country that can absorb, operate, and sustain AI systems.

Fourth, strategic alignment, meaning the consortium's proposal supports U.S. national security, enhances American competitiveness, and positions U.S. companies as long term partners in infrastructure, manufacturing, and digital transformation.

CEBOT's work across Tanzania and Kenya demonstrates how these factors produce successful outcomes and illustrates the importance of selecting consortia that combine governance, industrial capacity, AI expertise, and workforce development.

Q23. Considering Proposals That Include Non Consortium Contributors

Proposals should allow for non consortium contributors if they operate under defined governance and compliance frameworks approved by the lead entity. Many AI deployments require specialized institutions such as universities, grid operators, cold chain providers, packaging SMEs, logistics hubs, or aerospace training centers. These partners may not be formal consortium members but can play essential roles in local adoption, data generation, or workforce training.

To ensure integrity, contributions from non members should be limited to specific functions and governed by transparent agreements that adhere to export control requirements, cybersecurity policies, and standards alignment. CEBOT's partnerships with SUA, DIT, regional cooperatives, and Kenya's youth spaceport initiative demonstrate how non consortium contributors can be integrated responsibly into a full stack architecture without compromising governance or security.

Q24. Tradeoffs in Selecting More or Fewer Consortia for Participation in the Program

Selecting fewer consortia creates deeper oversight, stronger governance control, and more consistent deployment of American technology and standards. It also allows federal agencies to work closely with a limited number of intermediaries who can scale across multiple countries. However, limiting consortia also constrains the diversity of U.S. innovation and may slow the pace of regional expansion.

Selecting more consortia expands participation and innovation diversity but increases federal oversight complexity and risks inconsistent governance or uneven security alignment. The optimal strategy is to certify a limited number of anchor consortia with proven full stack capability and then allow additional specialized consortia to contribute within specific sectors. This creates both discipline and innovation while preserving U.S. security interests.

Q25. Additional Factors That Support the Competitiveness of American Technology

Three additional factors should be considered.
First, proposals must demonstrate the ability to stimulate U.S. manufacturing demand through procurement of microgrids, datacenter enclosures, packaging systems, AI

hardware, clean energy equipment, and advanced machinery. This drives domestic job creation and strengthens American industrial capacity.

Second, proposals should show clear alignment with U.S. AI standards, including lifecycle accountability, bias controls, cybersecurity readiness, auditability, and transparent data governance. These standards differentiate American AI from that of competitors.

Third, proposals should demonstrate the ability to create regional corridors of adoption, enabling U.S. companies to scale across multiple countries. CEBOT's integrated work across SUA's agricultural innovation corridor, DIT's public sector modernization track, and Kenya's emerging aerospace workforce corridor illustrates how U.S. technology can expand from demonstration sites into multi country systems.

These factors collectively maximize the global competitiveness of U.S. technology and ensure that American AI serves as a strategic asset for economic expansion and diplomatic influence.

Section X

Additional Considerations for Program Success

Q26. Participation of U.S. Companies Not Formally Included in a Consortium

The Program should create structured pathways for U.S. companies that fall within the AI technology stack but are not formal consortium members. Many small and medium enterprises offer components that are essential for full stack deployment, including cybersecurity tools, industrial sensors, workforce training systems, packaging equipment, microgrid components, and cloud applications. Allowing these firms to participate through pre vetted vendor pools, modular procurement pathways, or associate membership categories ensures that American innovation is not restricted to a small number of large companies. This also expands the economic impact of the Program by increasing procurement opportunities for U.S. manufacturers and service providers.

CEBOT already demonstrates how this can work in practice. Its two hundred participating companies span twenty seven technical and industrial categories and include both major U.S. technology providers and small manufacturers supplying specialized components. This structure enables a single consortium to mobilize a wide range of U.S. companies in the deployment of microgrids, packaging innovation centers, datacenter modules, agriculture AI, logistics systems, and workforce programs. A formal mechanism within the Program would allow this model to scale nationally.

Q27. Promoting Adoption of High Quality Technical Standards Abroad

The Program should position the United States as the global reference point for AI, data governance, cybersecurity, digital identity, clean energy microgrids, and datacenter standards. High quality standards promote interoperability, reduce operational risk, and strengthen the credibility of American technology. To achieve this, the Program should encourage consortia to embed NIST aligned frameworks, zero trust cybersecurity principles, transparent procurement practices, and lifecycle governance accountability into every deployment.

Universities and technical institutions in partner countries should serve as national standards diffusion centers. CEBOT's work with SUA, DIT, and Kenya's emerging

aerospace corridor illustrates how university led governance can institutionalize American standards across agriculture, public administration, industrial parks, and youth workforce development. Embedding standards through trusted institutions extends U.S. influence, strengthens U.S. aligned digital ecosystems, and reduces the adoption of adversarial technology platforms.

Q28. Additional Factors the Department Should Consider to Ensure Program Success

Three additional factors are essential to the long term success of the Program.
First, AI deployment must be tied to national development strategies. Nations adopt AI more effectively when it supports clear objectives such as agricultural value addition, energy modernization, logistics efficiency, aerospace training, or public sector transformation. CEBOT's microgrid industrial park strategy, datacenter deployment framework, and spaceport youth innovation pipeline illustrate how AI becomes a structural tool rather than an isolated application.

Second, program success depends on workforce systems that operate at national scale. AI enabled transformation requires tens of thousands of technicians, engineers, analysts, and operators. University ecosystems such as SUA and DIT, along with Kenya's emerging aerospace training hubs, provide the environment needed to train and credential these workers. Embedding U.S. aligned workforce pipelines into consortium proposals ensures long term sustainability and supports U.S. companies seeking stable operating environments abroad.

Third, program success depends on American technology becoming the organizing backbone of regional economic integration. AI systems become exponentially more valuable when deployed across corridors, clusters, and economic belts. CEBOT's work demonstrates how agricultural corridors, logistics networks, microgrid powered industrial parks, and aerospace workforce ecosystems can be connected into multi country systems that align with U.S. strategic interests. These corridors accelerate adoption, reduce cost, and expand the footprint of U.S. innovation.

By addressing these additional factors, the Program can create an enduring global architecture in which U.S. technology, standards, and institutions serve as the cornerstone of emerging digital economies.

Section XI

Case Study Annex

An Integrated Three Country Demonstration Architecture for Full Stack AI Deployment

Introduction

A Multi Layer, Multi Sector, Multi Country Test Network

For the American AI Exports Program to succeed, the United States must demonstrate that AI can operate inside the real conditions of national economies. AI needs energy, infrastructure, institutional partners, and workforce systems before it can meaningfully scale. The CEBOT field ecosystem across Tanzania and Kenya provides an integrated platform where all of these conditions exist in complementary forms.

Each demonstration site embodies a different layer of the AI export stack.
Together, they show how United States technology can anchor national modernization when deployed through governance ready institutions.

• SUA operationalizes AI for agriculture, industrialization, clean energy, packaging, and SME development.

• DIT operationalizes AI for public administration, digital governance, datacenter compute, and cybersecurity.

• Kenya operationalizes AI for next generation aerospace and youth workforce development.

This multi country architecture validates that AI adoption is a systems challenge. It requires aligned infrastructure, governance, policy, and talent. It requires institutions that operate in real time with real national responsibilities. It requires corridors, not pilots. The three platforms below together form the strongest real world demonstration available to the United States of what "full stack AI deployment" means in practice.

A. The SUA Microgrid Industrialization and Packaging Innovation Platform
A National Testbed for AI Enabled Economic Transformation

Sokoine University of Agriculture (SUA) offers the United States the most complete demonstration environment in East Africa for AI driven industrialization. SUA's national mandate, field presence, extension networks, research institutes, and longstanding

cooperative relationships make it uniquely positioned to support a systems level deployment.

1. A Full Stack Deployment Environment

The Government of Tanzania and CEBOT are advancing a national strategy anchored by thirty microgrid powered industrial parks and six Mega Centers. These centers integrate the foundational elements required for AI to function inside a real economy:

- microgrids capable of powering industrial loads
- high capacity processing and packaging lines
- cold chain systems supporting agricultural and export sectors
- broadband and distributed compute nodes
- traceability, digital identity, and quality assurance hubs
- workforce training and SME incubation facilities

This architecture forms a live testbed where American energy systems, packaging equipment, cloud and datacenter infrastructure, automation technologies, and AI applications interact with real supply chains and economic actors.

2. A Governance and Workforce Engine

SUA provides the governance structure required to anchor modernization across regions. Its role includes:

- operating the National Packaging Innovation Center
- conducting materials science, AI quality control, and traceability research
- training large cohorts of youth and technicians in modern manufacturing
- coordinating cooperatives, farmer networks, and regional deployment teams
- ensuring digital governance, compliance, and transparent performance tracking

SUA demonstrates that AI adoption requires institutional leadership capable of managing complexity, enforcing standards, and guiding multi stakeholder implementation.

3. A U.S. Export Demonstration Pipeline

Through this ecosystem, the United States gains a national scale platform to deploy and validate:

- clean energy microgrid technologies
- American packaging and automation equipment
- cold chain innovations and predictive logistics tools

• modular datacenter and cloud infrastructure
• AI applications for agriculture, materials science, and industrial operations

SUA allows U.S. technology to be tested and scaled under accountability, scientific rigor, and governance maturity.

B. The DIT Digital Public Infrastructure and Datacenter Corridor A Platform for AI Governance, Urban Digital Transformation, and Compute Expansion

The Dar es Salaam Institute of Technology (DIT) complements SUA by anchoring the public sector and regulatory dimensions of full stack AI. DIT works where national digital transformation, engineering, ICT, cybersecurity, and policy development converge.

1. A Public Sector AI Deployment Environment

DIT is positioned to support AI deployment inside ministries, agencies, municipalities, and national programs. Core modernization priorities include:

• national digital identity and verification systems
• procurement, budgeting, and financial transparency
• transportation analytics and urban mobility systems
• cybersecurity capacity building and zero trust frameworks
• regulatory sandboxes for AI oversight and model risk evaluation

This provides the U.S. with the conditions required to deploy governance and compliance layers of the AI stack.

2. The Early Datacenter and Cloud Compute Corridor

DIT also anchors the nation's early datacenter corridor, enabling compute resources for:

• public sector operations and digital public infrastructure
• industrial corridor analytics
• agricultural and geospatial data processing
• SME digitalization and fintech ecosystems
• cloud migration aligned with U.S. security expectations

Without compute and secure data frameworks, AI cannot scale. DIT provides the national environment where these capabilities can mature.

3. Strategic Value for the United States

DIT gives the United States a platform to deploy:

- modular American datacenters
- cloud architectures aligned with U.S. standards
- cybersecurity and digital governance tools
- NIST aligned regulatory and compliance models
- secure digital public infrastructure

DIT enables a governance corridor that increases demand for U.S. technologies and reduces reliance on non aligned digital ecosystems.

C. The Kenya Spaceport Youth Workforce Innovation Corridor A Continental Workforce Engine for AI, Aerospace, and Advanced Engineering

Kenya's emerging spaceport initiative offers a third demonstration platform centered on AI driven workforce development, aerospace exposure, and next generation engineering.

1. A Youth Workforce Opportunity of Continental Scale

Kenya produces millions of new entrants into the workforce annually. The spaceport initiative transforms this demographic advantage into a capabilities engine for:

- satellite ground operations
- UAV and drone systems management
- aerospace maintenance logistics
- digital twin simulation and testing
- AI assisted safety and operational oversight

This produces a regional workforce aligned with American aerospace and advanced engineering ecosystems.

2. AI Enabled Training and Technical Pathways

CEBOT's contribution focuses on:

- AI driven training simulations and technical apprenticeships
- workforce credentialing and safety engineering standards
- predictive maintenance and aerospace analytics

• digital twin training environments
• early exposure to American aerospace tools and platforms

This establishes a future oriented talent pipeline that complements the industrial and public sector modernization in Tanzania.

3. Strategic Alignment with U.S. Competitiveness

Together with SUA and DIT, Kenya completes the three part architecture needed for scalable AI ecosystems:

• a national industrialization hub
• a public sector and digital governance hub
• a continental workforce and high technology hub

This alignment strengthens U.S. competitiveness by ensuring AI exports are supported by a trained labor force capable of sustaining and expanding these systems.

Integrated Value of the Three Demonstration Sites

A Full Stack AI Export Ecosystem in Action**

The combination of SUA, DIT, and Kenya forms an integrated, multi country corridor that demonstrates the real conditions required for successful AI deployment at national scale.

The three platforms collectively validate that AI requires:

• infrastructure and clean energy
• compute and datacenters
• data systems and traceability
• governance and security
• workforce and institutions
• sector specific corridors
• export finance readiness
• standards adoption
• multi country scalability

These conditions cannot be created by software alone. They require systems architecture, coordinated institutions, and aligned national strategies. These three platforms provide that architecture today.

Why This Matters to the American AI Exports Program

This demonstration ecosystem shows that:

- AI adoption is a systems level endeavor, not a technology transaction
- Full stack deployment becomes viable when anchored in strong institutions
- U.S. exports expand when paired with clean energy, datacenters, packaging, and workforce systems
- Regional corridors amplify U.S. diplomatic and economic influence
- American AI becomes the default architecture for emerging economies when governance and infrastructure are aligned with U.S. standards

This three country demonstration corridor is the most advanced, high fidelity, and strategically aligned example currently available of the Program's vision operationalized in the real world.

Section XII

Conclusion

The American AI Exports Program represents a generational opportunity for the United States to shape the global architecture of artificial intelligence, digital governance, industrial modernization, and regional economic integration. The Program's ambition cannot be met through traditional vendor based approaches that focus on selling discrete products. It requires full stack deployment capabilities that integrate U.S. manufactured infrastructure, secure data systems, AI tools, energy innovation, workforce pipelines, and governance aligned institutions into a unified export ecosystem.

CEBOT's consortium model demonstrates how this can be achieved responsibly, securely, and at national scale. The consortium is structured to combine the strengths of two hundred U.S. companies, American research institutions, university partners, microgrid developers, industrial systems suppliers, AI engineering firms, cybersecurity providers, and regional institutional partners. Its Governance as a Service platform provides the transparency, compliance, lifecycle integrity, and export control alignment required for responsible deployment of advanced technologies abroad. The consortium's field proven partnerships with SUA, DIT, and Kenya's emerging aerospace workforce ecosystem illustrate what a true full stack deployment looks like in practice.

These deployments serve as national demonstration sites where microgrids, packaging systems, datacenters, AI agriculture, digital governance, and aerospace workforce programs are integrated into coordinated modernization strategies that align with U.S. standards and strategic interests. They validate the core premise of this Program. AI deployment succeeds when governance, infrastructure, institutions, and workforce systems advance together.

By selecting consortia capable of delivering integrated full stack solutions, the United States can create long term economic pathways for American companies, accelerate domestic manufacturing demand, expand U.S. leadership in global technology standards, and strengthen diplomatic and economic relationships with trusted partners. CEBOT's model provides the Department of Commerce with a scalable framework to operationalize this vision across Africa, the Caribbean, and the Indo Pacific.

The consortium stands ready to contribute to this national mission, to support interagency coordination, and to deliver full stack American AI exports that advance economic opportunity, national security, and global competitiveness.