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SCALE AI RESPONSE TO
THE DEPARTMENT OF COMMERCE'S
INTERNATIONAL TRADE ADMINISTRATION
REQUEST FOR INFORMATION
"AMERICAN AI EXPORTS PROGRAM"
DOCKET #251023-0165

Scale AI (Scale) is pleased to respond to the Department of Commerce's Request for Information (RFI) on the American AI Exports Program. Scale strongly supports the intent of the RFI and appreciates the Trump Administration's commitment to ensuring United States leadership in Artificial Intelligence (AI).

INTRODUCTION

Scale was founded in 2016 and has always been at the forefront of AI innovation. Today, our mission is to develop reliable AI for the world's most important decisions. We work with nearly every leading frontier AI lab, as well as governments and companies deploying AI systems. This has enabled us to best understand how to build and deploy the highest quality AI systems.

Since 2020, we have been fortunate to work with the United States Government (USG) on some of their most ambitious AI programs. At a time where many other tech companies were shying away from this type of work, we leaned in. We did this because of our commitment to ensuring that the USG has access to best-in-class technology. More recently, we have started to work with U.S. allies to do the same.

DEFINING THE AI TECH STACK

The AI tech stack is made up of four key components: compute, data, models, and applications. Technology development in each of these four components is critical to delivering the true promise of AI. While much global attention has been paid to compute and generative AI models,AI deployment is not possible without the rest of the technology stack. In order to better understand how to develop and ultimately export the AI tech stack, it first must be clearly defined.

Compute: Adequate compute capacity—including advanced chips and reliable power—remains essential for developing state-of-the-art models. While frontier labs and nation-states continue to invest in expanding compute resources, compute alone is insufficient to enable national-scale AI adoption.

Data: Countries around the world recognize the importance of data as a national asset. The effectiveness of any AI system depends on the relevance, quality, and contextual depth of the data on which it is trained. For example, a model trained exclusively on English language data is unlikely to perform optimally in regions with different language bases, such as Japanese or Arabic. Countries that seek to build AI optimized for local priorities will want to utilize models that are optimized for their languages and cultural context.

Model: The past three years have seen rapid advances in both open and closed source model capabilities, giving countries a growing set of viable options. In many cases, a model-agnostic approach to designing and implementing the AI tech stack is optimal; each model has its own strengths and capabilities. Tech stack performance should be modifiable to fit specific tasks. The reality is that no single model excels at everything.

Applications: Just as applications on our computers and mobile devices bring out the full capabilities of an operating system, applications in AI leverage the other elements of the AI tech stack to deliver real AI capability. Building and integrating applications is what translates model performance into operational impact.

THE URGENCY TO SECURE FUTURE AI LEADERSHIP

Today we stand at a crossroads. The coming year will see the global standard for AI set; the question as yet unanswered is whether it will be defined by the United States or China. It is imperative that the United States defines this future.

This position is not new, and we have been here before. Nearly a decade ago, the world had the same choice to make regarding 5G technology deployment. China dominated that race and the United States still has not caught up.

Recognizing this urgent priority, the Trump Administration issued the "Promoting the Export of the American AI Technology Stack" Executive Order, which focused on leveraging the full strength of the USG to make sure that countries have access to the U.S. AI tech stack.

For the past year, the world has focused on whose AI models are the most capable. U.S. models were viewed as well ahead of those in China, driven largely by the greater availability of cutting-edge compute chips. The launch of China's Deepseek changed that calculus, as it demonstrated that compute was not necessarily the determining factor for AI dominance. More recently, with the release of additional models, China has shown that they have nearly as capable AI models as the United States. It is now clear that no country can win with one element of the tech stack alone, be it compute or model: the country that will set the global standard on AI must win with all elements of the tech stack..

The model is just one, albeit very important, element of the tech stack. If the United States wants to win, it must do so on all elements—compute, model, data, and applications. This

does not mean that each element needs to be developed in the United States. Certain parts of the AI tech stack, such as data, could be sovereign to each country. The development that is critical to push for is that the tech stack is run on US technology.

Winning requires a "whole of government" approach. The Trump Administration has taken important steps to support that effort. Yet, we must have all the tools of the government at our disposal, because we know that China is using the full force of theirs. This Executive Order rightly enables flexible funding through groups like the Export-Import Bank and Development Finance Corporation, but most projects will not require government financing to be successful since companies, like Scale, are willing to invest. In addition to funding, government support should include advocacy through departments and agencies like the Department of State and the Department of Commerce.

Based on our role in the ecosystem, we firmly believe that Scale is in a unique position to lend our voice to this discussion. To that end, we have focused our responses to the RFI on the elements most relevant to our business model.

SCALE AI RESPONSES TO RELEVANT RFI QUESTIONS

Section A: Respondent Background

1. 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.

> Founded in 2016, Scale is a private U.S. company headquartered in San Francisco, California. Scale's mission is to develop reliable AI systems for the world's most important decisions. We provide the high-quality data that powers the world's AI models, and we help enterprises and governments build, deploy, and oversee AI applications that create real impact.
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> We currently work with U.S. allied governments around the world to export American AI, enabling those nations to surmount their most significant challenges. Some examples of this work include our partnership with the Qatari Government to deliver frontier AI solutions encompassing tens of different use cases around constituent services and our collaboration with Oman to contribute to their national large language model (LLM).

2. 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.

> Scale exports U.S.-origin AI technologies through two primary offerings: (1) AI Data Readiness, where we enable governments to securely leverage sovereign data for AI;

and (2) Applied AI Solutions, where we develop AI applications tailored to government workflows.

To deliver these capabilities internationally, Scale partners with U.S. cloud service providers, silicon manufacturers, and frontier model developers. This ensures that the majority of the exported AI stack remains firmly rooted in American technology and innovation, even when deployments incorporate sovereign data or when localized infrastructure is required by partner nations.

Section B: The AI Tech Stack

4. 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?

Scale agrees with the core components outlined in E.O. 14320 but recommends further delineation between AI models and AI applications within the stack. These are distinct layers that require different competencies, policy considerations, and governance frameworks.

Separating the model and the application ensures that the best tech stack can be compiled. Decoupling the model from the application allows for the possibility of model-agnostic architectures when designing applications. A model-agnostic architecture for applications is superior because it allows the use case to drive the selection of the AI model best suited to the specific problem. Different models excel in different contexts. The model most effective for software engineering tasks may not be optimal for public sector service delivery or education. Thus, a model-agnostic architecture is critical to delivering high quality outcomes and will ultimately provide the best solution for the customer.

Application development is the final step of bringing value to AI. It leverages the rest of the tech stack: once the compute is optimized, the specific model is selected, and the data has been accessed and fine tuned, the application leverages the AI tech stack to create AI-driven solutions to specific use cases. These use cases can be as disparate as improving the approval process for permitting to assisting in teaching students in K-12 education.

Explicitly distinguishing between AI models and AI applications would allow consortia to combine the best U.S. models with the appropriate American-developed applications to meet a country's needs. This strengthens competitiveness, ensures responsible deployment, and maximizes the performance of exported AI capabilities.

Section C: Consortia Membership and Formation

7. Generally, if guidance were provided on how consortia should be formed and governed, what should be included in that guidance?

> Scale strongly believes that the USG should permit each unique consortium to take shape based on the needs of the individual project and customer. We anticipate there will be some overlap in the members of the consortia across countries and use cases. Nonetheless, it is important that the Program provides maximum flexibility in the choice of consortium members to countries looking to export the AI tech stack. AI tech stack members best suited to one consortium project may not all be best suited to another consortium's project, use case, and requirements.
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> By enabling this flexibility, the Department of Commerce best positions U.S. companies to win the work instead of Chinese competitors in this space.

8. On consortia membership and composition:

b. What criteria should determine whether a consortium as a whole is eligible to participate in the Program (*e.g.*, having a minimum number of members, a certain amount of U.S. representation, capacity to export all parts of the AI technology stack, or other factors)?

> Scale does not believe that the USG should establish a rigid system for evaluating consortia. Rather, requirements and evaluations should be determined by what enables the consortia to meet the needs of a potential project. In fact, there could be multiple U.S. consortia bidding on the same project, which should be encouraged as it maximizes U.S. potential to win it.
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> It's clear that the Chinese Communist Party will not let rigid structure get in the way of winning and we—the USG and U.S. industry—can't either.

d. How often should the Program expect industry to seek changes to consortium membership? How should the Program approach potential changes in consortium membership?

> Scale believes that consortia should determine membership based on what is optimal for their individual project. The AI industry is dynamic with new entrants emerging at a rapid clip, making flexibility and adaptability critical. Allowing the updating of consortium membership to include new entrants will enable consortia to meet the needs of foreign government partners—and in turn, provide the best solution. In practice, membership will likely be determined at the inception of a new use case – with different constellations of companies working on each project. Based on our experience, we believe that this approach is critical to build the best tech stack possible for specific use cases.

9. On the role of foreign companies and countries:

c. What role, if any, should foreign countries play in consortium development?

Foreign governments and foreign-based entities play an essential role in projects that require integration with local data, infrastructure, and regulatory systems. Many AI applications cannot function without access to sovereign datasets or in-country deployment environments.

For example, in Qatar, Scale's ability to deliver high quality constituent service applications depends on access to Qatari generated and Qatari hosted data. Similarly, national LLM initiatives – where a country builds and fine tunes a LLM to best serve the needs of their citizens – often require localized companies and institutions to ensure cultural and linguistic relevance. Both situations require local participation.

To deliver the highest quality solution to foreign governments, it's clear that certain elements of the tech stack may require local partners. Scale has seen this work well in our work abroad, but it's also important to recognize which aspects of the tech stack can be served by local partners. For example, the compute layer likely needs to be a U.S.-developed element, whereas the data may need to come from a local government or partner.

Beyond the technical reasons to bring in foreign partners, there are also geopolitical ones. Where appropriate, bringing other countries into a consortium and enabling them to work with U.S. companies could facilitate greater integration with U.S. industry rather than Chinese competitors.

Section F: Federal Support

a. Are there any federal support mechanisms not identified above that the Department, in coordination with other federal agencies, should consider mobilizing to support designated AI export packages in the Program?

Scale strongly supports the Administration's intent to use federal mechanisms to accelerate the export of trusted U.S. AI systems. While financing is valuable, our experience indicates that the primary bottleneck is not capital availability, as U.S. companies frequently coinvest or self-fund initial deployments.

We believe that USG advocacy could be the real unlock for U.S. industry consortia pursuing foreign opportunities. We know that the Chinese Communist Party partners directly with Chinese industry to support their international work. Though the relationship structures are inherently different, Department of Commerce or Department of State engagement with foreign governments on these issues could significantly strengthen the position of U.S. industry vis-a-vis Chinese competitors in this space. These actions can directly ensure that American AI solutions are recognized as the most secure, trusted, and strategically-aligned option.

Section I: Additional Information

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

> Scale strongly believes that global leadership in AI must start with leadership on technical consensus-based standards. Technical standard setting has historically proven to be a path to market expansion and technology adoption. A recent example was China's ability to aggressively export their 5G technology. China's success in the 5G market started with their work at standards bodies around the world. Once China wrote the standards, they were able to build low cost technology that met the established standards, thereby effectively cutting the United States out from competing globally. As the USG continues to advance our strategy toward global AI leadership, it's critical to recognize the importance of exporting our technical standards as a high priority.

Thank you again for the opportunity to provide input on the American AI Exports Program. Scale AI strongly supports the Administration's efforts to ensure U.S. leadership in the global AI landscape. We look forward to continuing to partner with the Department of Commerce and other federal agencies to advance a secure, competitive, and innovation-driven American AI technology stack abroad.

Please direct any questions to the undersigned.

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