

November 26, 2025

International Trade Administration
U.S. Department of Commerce
1401 Constitution Avenue NW
Room 2846
Washington, District of Columbia 20230

RE: Comments of ACT | The App Association to the International Trade Administration on its Request for Comments on the American AI Exports Program (Docket No. 251023-0165)

ACT | The App Association (ACT) appreciates the opportunity to submit written comments to the International Trade Administration (ITA) in response to its Request for Information (RFI) on the establishment of the American AI Exports Program pursuant to Executive Order 14320, “Promoting the Export of the American AI Technology Stack.”¹

I. Introduction and Statement of Interest

ACT represents small business software application development companies and technology firms that create the technologies that drive internet of things (IoT) use cases across consumer and enterprise contexts. Today, the value of the domestic ecosystem ACT represents—which we call the app economy—is valued at \$1.8 trillion and is responsible for 6.1 million American jobs, while serving as a key driver of the \$8 trillion IoT revolution.² Alongside the world’s rapid embrace of mobile technology, our members create the innovative solutions that power IoT across modalities and segments of the economy. As ACT members increasingly grow their businesses by leveraging the global digital economy, they export, re-export, and transfer in-country emerging technologies abroad, as well as utilize distributed workforces that may be located abroad and/or that include foreign nationals as employees, interns, or consultants; thus, fair access to the global market is essential to the American small business developer community’s success.

As the Administration launches the American AI Exports Program, we welcome efforts to strengthen U.S. AI leadership and support American companies competing abroad. At the same time, it is essential that this program uphold the competitiveness of small and medium-sized businesses (SMBs), the backbone of U.S. innovation, by ensuring that program requirements, consortia structures, tech-stack definitions, and federal support mechanisms are accessible, modular, and risk-proportionate, and not designed solely around the capabilities and business models of hyperscalers.

We applaud ITA’s efforts to develop a comprehensive foundation for the American AI Exports Program and to solicit public input on the policies, structures, and requirements that will guide the

¹ <https://www.federalregister.gov/documents/2025/10/28/2025-19674/american-ai-exports-program>.

² ACT | The App Association, State of the App Economy (2022), <https://actonline.org/wpcontent/uploads/APP-Economy-Report-FINAL.pdf>.

export of full-stack American AI technologies. We commit to working with ITA and other stakeholders to ensure this program effectively supports U.S. innovators and strengthens America's global AI leadership. With respect to digital trade, the small business innovators we represent prioritize the following principles:

- **Cross-Border Data Flows:** The seamless flow of data between economies and across political borders is essential to the functioning of the global economy. Innovative app development companies must be able to rely on unfettered data flows as they seek access to new markets.
- **Reversal of Data Localization Policies:** American companies looking to expand into new markets often face regulations that force them and other foreign providers to build and/or use local infrastructure in the country. Data localization requirements seriously hinder imports and exports, reduce an economy's international competitiveness, and undermine domestic economic diversification. Our members do not have the resources to build or maintain unique infrastructure in every country in which they do business, and these requirements effectively exclude them from commerce.
- **Elimination of Customs Duties on Digital Content:** American app developers and technology companies must take advantage of the internet's global nature to reach the 95 percent of customers who live outside of the United States. However, the "tolling" of data crossing political borders with the purpose of collecting customs duties directly contributes to the balkanization of the internet. These practices jeopardize the efficiency of the internet and effectively block innovative products and services from market entry.
- **Ban Market Entry Contingent on Source Code Transfer Practices:** Some governments have proposed policies that require companies to transfer, or provide access to, proprietary source code as a requirement for legal market entry. Intellectual property is the lifeblood of app developers' and tech companies' innovation; the transfer of source code presents an untenable risk of theft and piracy. Government policies that pose these requirements are serious disincentives to international trade and a non-starter for ACT's members.
- **The Ability to Utilize Strong Encryption Techniques to Protect End User Security and Privacy:** Global digital trade depends on the use of strong encryption techniques to keep users safe from harms like identity theft. However, some governments continue to demand that backdoors be built into encryption keys for the purpose of government access. These policies jeopardize the safety and security of data, as well as the trust of end users, by creating known vulnerabilities that unauthorized parties can exploit. From a privacy and security standpoint, the viability of an app company's product depends on the trust of its end users.
- **Intellectual Property Protections:** The infringement and theft of intellectual property and trade secrets threatens the success of ACT's members and hurts the billions of consumers who rely on these app-based digital products and services. These intellectual property violations can lead to customer data loss, interruption of service, revenue loss, and reputational damage – each alone a potential "end-of-life" occurrence for a small app development company. Strong but fair protection of intellectual property for copyrights, patents, trademarks, and trade secrets is essential to the success of our members.

- **Misapplication of Competition Laws to Software Distribution Platforms:** Various regulators, including key trading partners, are currently considering or implementing policies that jeopardize the functionality of mobile operating systems and software distribution platforms that have enabled countless American small businesses to grow. Since its inception, the app economy has successfully operated under an agency-sale relationship that has yielded lower overhead costs, greater consumer access, simplified market entry, and strengthened intellectual property protections for app developers with little-to-no government influence. Foreign governments regulating digital platforms and curated online marketplaces inconsistent with U.S. law will upend this harmonious relationship enjoyed by small-business app developers and mobile platforms, undermine consumer privacy, and ultimately serve as significant trade barriers. Frameworks like the Digital Markets Act (DMA) could diminish the online marketplaces our member companies use. This is in part because open access requirements in the DMA (and similar proposals and policies across other important markets) would introduce new security and privacy vulnerabilities, which disproportionately harm small app company prospects. But the open access mandates would also hamstring American competitors, opening significant market opportunities for rival companies owned by Chinese firms that would not be subject to the regulatory framework.

The strong U.S. innovation ecosystem, driven primarily by small businesses, is well-positioned to increase U.S. exports of AI, strengthening the nation’s competitiveness. It is important for the U.S. government to recognize, document, and work to prevent AI (and other emerging technology)-specific trade barriers increasingly being proposed and finalized across key markets. For example, the European Commission’s AI Act could impose overly stringent obligations on “high-risk” AI systems and outright bans on “unacceptable risk” AI systems, that threaten to inhibit innovation in numerous ways and suppress U.S. innovators’ ability to export to AI to the EU (as well as other jurisdictions that choose to mirror its requirements).³ In Europe and elsewhere, the assistance of ITA and other U.S. government agencies is critical in ensuring a global trading environment that will facilitate the development and export of AI while using a scaled and risk-based approach to mitigating demonstrated harms.

II. Overarching Themes and Recommendations

To ensure the American AI Exports Program fulfills its goals while supporting the full spectrum of U.S. innovators, including SMBs, the program should incorporate flexible, modular, and risk-proportionate approaches across its core policy areas.

SMB participation must be realistic and meaningful. Program structures, including consortia eligibility, technical requirements, security obligations, and access to federal financing, should not unintentionally limit participation to hyperscalers. SMBs contribute essential components of the AI technology stack, such as domain-specific applications, data labeling systems, cybersecurity features, testing resources, accessibility tools, and standards-based interoperability modules. Federal guidance should emphasize:

³ For more details, please see ACT’s public comments filed with the European Commission, available at: https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12527-Artificial-intelligence-ethical-and-legal-requirements/F2665281_en

- Modularity that allows consortia to assemble full-stack export packages through component-level partnerships rather than vertical integration.
- Flexible, industry-led governance structures that do not privilege only the largest firms.
- Right-sized compliance expectations that reflect organizational scale.

Definitions of the full AI technology stack should not impose unnecessary burdens. Many SMBs specialize in distinct segments of the stack. Program implementation should clarify that the full stack is a consortium-level capability rather than a requirement for any single member. Participation should be explicitly permitted for SMBs that supply one or more stack components, and consortia should be allowed to demonstrate full-stack readiness through collective capacity rather than ownership of every layer.

Export controls and national security safeguards should not create de facto barriers for SMBs. Trusted partner designations and export-control documentation requirements should be transparent, scalable, and aligned with actual risk. SMBs should not be excluded by complex certification processes or high compliance burdens. Rules should avoid broad presumptions of risk for small developers that lack geopolitical leverage.

The program should promote open standards, interoperability, and FRAND-protected innovation. Alignment with the National Institute of Standards and Technology's (NIST) AI Risk Management Framework, voluntary consensus-based technical standards, and safeguards against abusive standard-essential patent licensing practices is essential. These measures help ensure that American AI technologies, including those developed by SMBs, can operate safely, reliably, and competitively across global markets.

Federal support tools must be accessible to SMBs. ITA market navigation support should offer scaled pathways for smaller exporters rather than only for firms capable of constructing or operating capital-intensive infrastructure. Support should extend to lightweight deployments such as AI-enabled health, education, agriculture, accessibility, and cybersecurity applications.

Domestically, in other jurisdictions, and in the context of international trade across a range of fora, ACT has been forthright in recognizing that AI also has the potential to raise a variety of unique considerations for policymakers. ACT appreciates ITA's exploration of global trade implications, especially exports, regarding AI technologies. To assist the Administration, we offer a comprehensive set of AI policy principles, appended to this filing, with which we strongly encourage alignment as the U.S. government engages with key trading partners abroad.⁴

ACT also continues to work proactively to advance the adoption of AI in key use cases. As just one example, ACT's Connected Health Initiative⁵ (CHI) assembled a Health AI Task Force in the summer of 2018 consisting of a range of innovators and thought leaders. CHI unveiled its AI Task Force's deliverables during a public-private multistakeholder dialogue in Washington, DC, which included a position piece supporting AI's role in healthcare, policy principles addressing how policy frameworks should approach the role of AI in healthcare, and a terminology document targeted at

⁴ ACT | The App Association's AI policy principles are appended to this comment.

⁵ See www.connectedhi.com.

policymakers.⁶ Since then, CHI has also developed Good Machine Learning Practices specifically for AI development and risk management of AI meeting the Food and Drug Administration’s definition of a medical device.⁷ More generally, ACT continues to lead in advocating for the establishment of frameworks that will responsibly support the development, availability, and use of AI innovations.

III. Responses to Specific Questions

Section B: The AI Tech Stack (Questions 4, 5, and 6). ACT has worked to define the typical actors in an AI value chain, and to recommend steps, mapped to the NIST AI Risk Management Framework, that each actor should take to ensure efficacy and safety. We urge ITA and the Department of Commerce to align its AI export program with this risk-based, pro-innovation approach.

⁶ The CHI Health AI Task Force’s deliverables are accessible at <https://actonline.org/2019/02/06/why-does-healthcare-need-ai-connected-health-initiative-aims-to-answer-why/>.

⁷ The CHI’s Good Machine Learning Practices are available at <https://bit.ly/3gcar1e>.

Stakeholder Group	Definition	Roles	NIST RMF Actor Tasks
AI/ML Developers	<p>Someone who designs, codes, researches, or produces an AI/ML system or platform for internal use or for use by a third party.</p> <p>See below for defined Subgroups of this Stakeholder Group along with recommendations specific to that Subgroup.</p>	<ul style="list-style-type: none"> • Informing deployers and users of data requirements/definitions, intended use cases/populations and applications (e.g., disclosing sufficient detail allowing providers to determine when an AI-enabled tool should reasonably apply to the individual they are addressing), including whether the AI/ML tools are intended to augment human work versus automate workflows, and status of/compliance with all applicable legal and regulatory requirements. • Prioritizing safety, effectiveness, transparency, data privacy, and security from the earliest stages of design, leveraging (and, where appropriate, updating) existing AI/ML guidelines on research and ethics, leading standards, and other resources. • Employing algorithms that produce repeatable results and, when feasible, are auditable, and make decisions that comply with relevant sector-specific requirements. • Using risk management approaches that scale to the potential likely harms posed in intended use scenarios to support safety, protect privacy and security, avoid harmful outcomes due to bias, etc. • Providing information that enables those further down the value chain can assess the quality, performance, and utility of AI/ML tools. 	<p>AI Deployment; Operation and Monitoring; Test, Evaluation, Verification, and Validation (TEVV); Human Factors; Domain Expert; AI Impact Assessment; Governance and Oversight</p>

		<ul style="list-style-type: none"> Aligning with relevant ethical obligations and international conventions on human rights and supporting the development of new ethical guidelines to address emerging issues. 	
Foundation Model Developer	Someone who creates or modifies large and generalizable machine learning models that can be used/adapted for various downstream tasks and applications, such as natural language processing, computer vision, or software development.	<p>Building on the cross-AI/ML Developer roles noted above:</p> <ul style="list-style-type: none"> Assessing what bias and safety issues might be present in its Foundation Model, and documenting steps taken to mitigate those issues in its Transparency Documentation (e.g., Transparency Notes, System Cards and product documentation). Providing clear guidance on (1) how to use and adapt its Foundation Model for various foreseeable downstream tasks and applications, and (2) what limitations or risks may arise from doing so based on challenges discovered during testing and deployment. 	AI Deployment; Operation and Monitoring; Test, Evaluation, Verification, and Validation (TEVV); Human Factors; Domain Expert; AI Impact Assessment; Governance and Oversight
AI Platform Developer	Someone who leverages existing foundation models and builds an industry-agnostic platform that enables other developers to access, customize, and deploy these models for various use cases and applications, such as natural language processing, computer vision, and/or software development.	<p>Building on the cross-AI/ML Developer roles noted above:</p> <p>Testing for, identifying, and mitigating bias and safety issues that may arise from using or modifying existing foundation models for its AI Platform, and documenting these issues and steps taken to address them in its transparency documentation (e.g., transparency notes, system cards and product documentation).</p>	AI Deployment; Operation and Monitoring; Test, Evaluation, Verification, and Validation (TEVV); Human Factors; Domain Expert; AI Impact Assessment; Governance and Oversight
Use Case AI Platform Developer	Someone who creates or uses AI-powered platforms	<p>Building on the cross-AI/ML Developer roles noted above:</p>	AI Deployment; Operation and Monitoring; Test,

	that are tailored for a particular domain or sector. These platforms may leverage foundation models (or other types of machine learning models or solutions), such as AI platforms, that are suitable for domain-specific problems and data sources.	<ul style="list-style-type: none"> Meeting specific requirements and standards of the domain to address unique accuracy, efficacy, explainability, and compliance needs. Testing for, identifying, and mitigating any bias and safety issues that may affect domain-specific outcomes or performance needs, and documenting these issues and the steps it has taken to address them in its transparency documentation (e.g., transparency notes, system cards and product documentation). 	Evaluation, Verification, and Validation (TEVV); Human Factors; Domain Expert; AI Impact Assessment; Governance and Oversight
AI Solution Developer	Someone who creates complete digital tools and technologies for a domain. They may build or incorporate AI solutions with both use case AI platforms, which are specialized for the domain, and AI platforms, which are more general and adaptable for various use cases and applications.	<p><i>Building on the cross-AI/ML Developer responsibilities noted above:</i></p> <ul style="list-style-type: none"> Specifying appropriate uses for its solution to avoid amplifying bias or safety issues that may exist in the underlying foundation models, AI platforms, or domain-specific AI platforms. Designing user interfaces to enable an end user to safely and effectively act upon the output of the tool, such as providing explanations, feedback mechanisms, or human oversight options, providing clear documentation to Deploying Organizations and Users to help them avoid bias and safety issues. 	AI Deployment; Operation and Monitoring; Test, Evaluation, Verification, and Validation (TEVV); Human Factors; Domain Expert; AI Impact Assessment; Governance and Oversight
Deploying Organization	Someone who is deploying solutions built by AI Solution Developers. They may also have their own internal IT staff that employ use case AI platforms or general AI platforms to develop their own	<p><i>Respecting that managing AI/ML risks will be more challenging for small to medium-sized organizations depending on their capabilities and resources:</i></p> <ul style="list-style-type: none"> Adopting AI/ML Developer instructions for use, specifying appropriate uses for Users through governance policies to avoid 	AI Deployment; Operation and Monitoring; Domain Expert; AI Impact Assessment; Procurement; Governance and Oversight

	<p>custom AI solutions.</p>	<p>bias and safety issues that may exist in the underlying foundation models, AI platforms, or use case AI platforms.</p> <ul style="list-style-type: none"> • Developing and leveraging solutions that augment efficiencies in automation, facilitate administrative simplification/reduce workflow burdens, and are fit for purpose. • Setting organization policy/designing workflows to reduce the likelihood that a User will act upon the output of the tool in a way that would cause fairness/bias or safety issues (tailored explanations, feedback mechanisms, and/or human oversight options). • Assuring that AI/ML systems allow for the individualized assessment of domain-specific circumstances and flexibility to override automated decisions, ensuring that use of AI/ML does not improperly reduce or withhold intended benefits or inappropriately override human judgement. • Developing support mechanisms for the use of AI/ML by providers based on validation, aligning with decision-making processes familiar to the domain and high-quality evidence. • Developing organizational guidance on how the AI solution should and should not be used. • Creating engagement pathways to support dialogue with AI use case developers, AI solution developers, or any other applicable AI/ML developer, to enable ongoing updates 	
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		<p>to address evolving risks and benefits of AI solution uses.</p> <ul style="list-style-type: none"> • Creating risk-based, tailored communications and engagement plans to enable easily understood explanations to customers about how the AI solution was developed, its performance and maintenance, and how it aligns with the latest best practices and regulatory requirements. 	
AI End Users	<p>Someone who directly interacts with or benefits from the AI solutions that are built by AI Solution Developers or by the internal IT staff of the Deploying Organization.</p>	<p><i>Respecting that managing AI/ML risks will be more challenging for small to medium-sized organizations depending on their capabilities and resources:</i></p> <ul style="list-style-type: none"> • Aligning with consensus AI/ML definitions, present-day and future AI/ML solutions, the future of AI/ML changes and trends. • Taking required training and incorporating employer guidance about use of AI/ML solutions. • Documenting (through automated processes or otherwise) and reporting any issues or feedback to the developer, such as errors, vulnerabilities, biases, or harms (where AI/ML's use is known by the User). • Ensuring there is appropriate review of the output or recommendations from each AI solution prior to acting on it to make decisions, if relevant (where AI/ML's use is known by the User). • Raising awareness of and acting according to customers' rights and choices when using AI solutions, such as consent, access, correction, or deletion of their personal data. 	<p>AI Deployment; Operation and Monitoring; Domain Expert; AI Impact Assessment; Procurement; Governance and Oversight; Human Factors</p>

<p>Standard-Setting Organizations</p>	<p>An organization whose primary function is developing, coordinating, promulgating, revising, amending, reissuing, interpreting, or otherwise contributing to the usefulness of technical standards to those who employ them.</p>	<ul style="list-style-type: none"> Developing and promoting adoption of international voluntary/non-regulatory consensus standardized approaches and resources to steward a shared responsibility approach to technology standards that include or are otherwise related to AI. 	<p>Human Factors; Domain Expert; AI Impact Assessment; Governance and Oversight</p>
<p>Certification Bodies & Test Beds</p>	<p>A certification body is a third-party organization that assures the conformity of a product, process or service to specified requirements.</p> <p>A test bed is a platform for conducting rigorous, transparent, and replicable testing of scientific theories, computing tools, and new technologies to a standard.</p>	<ul style="list-style-type: none"> Creating and making available transparent and reliable processes for the assurance of conformity to voluntary AI standards. Creating and making available voluntary sandbox environments to help evaluate the usability and performance of AI/ML-based high-performance computing applications to advance the understanding of how reliable and efficacious AI, and to provide an appropriate assurance of reliability and efficacy. 	<p>Test, Evaluation, Verification, and Validation (TEVV); Human Factors; Domain Expert; AI Impact Assessment; Governance and Oversight</p>
<p>Accrediting and Licensing Bodies, Specialty Societies and Boards</p>	<p>Accrediting and licensing bodies are governing authorities that establish the suitability of any participating certification body. Notably, state-level boards serve this purpose for certain professions to standards set by each state.</p> <p>Specialty societies are organizations for</p>	<ul style="list-style-type: none"> Based on needs and expertise, developing and setting the standard of practice/behavior and ethical guidelines to address emerging issues with the use of AI/ML in the relevant domain. Identifying the most appropriate uses of AI-enabled technologies and developing and disseminating guidance and education on the responsible deployment of AI/ML, both generally and for specialty-specific uses. 	<p>Test, Evaluation, Verification, and Validation (TEVV); Human Factors; Domain Expert; AI Impact Assessment; Governance and Oversight</p>

	specialized professionals.		
Academic Education Institutions	Tertiary educational institutions, professional schools, or forms a part of such institutions, that teach and award professional degrees.	<ul style="list-style-type: none"> • Developing and teaching curriculum that will advance understanding of and ability to use AI/ML solutions responsibly, which should be assisted by inclusion of data scientists and engineers as instructors as needed. • Developing curriculum to advance the understanding of data science research to help inform ethical bodies. 	Human Factors; Domain Expert; AI Impact Assessment

Section C: The AI Tech Stack (Questions 7, 8, 9 and 10). Guidance on consortia formation and governance under E.O. 14320 should provide clear yet flexible frameworks that promote transparency, fairness, and broad industry participation, particularly including small companies. It should specify governance structures with clear roles, decision-making processes, and mechanisms to safeguard intellectual property and address conflicts of interest. The guidance should encourage a modular approach to consortium design, allowing members to participate in specialized segments, in order to promote innovation and dynamism. Program rules around membership changes should be flexible enough to allow annual updates or timely adjustments with transparent notification and review processes, reflecting the fast pace of AI development and market evolution.

Consortia success and membership should be conditioned on supporting the time-tested and world-leading U.S. approach to technology standards in OMB Circular A-119.⁸ Further, ITA and Commerce Department guidance should instruct consortia on ways to mitigate barriers to the use of standards. As a prime example of such barriers, abusive tactics by entities that voluntarily attach patents to open standards under FRAND commitments pose significant challenges, as these patent holders, known as standard-essential patent (SEP) owners, inherently control access to the standard. While patent holders have exclusionary rights, those who contribute to standards agree to license on fair, reasonable, and non-discriminatory (FRAND) terms to enable broad adoption. However, SEP licensing abuse, often amplified by non-practicing entities (NPEs) asserting questionable patents or engaging in privateering, disproportionately impacts small businesses and threatens the goals of government initiatives like the AI Export Program. Addressing these challenges requires targeted policy actions to clarify U.S. standards and patent policies, promote competition, and prevent abusive SEP enforcement that undermines American innovation and market fairness. By embedding straightforward FRAND commitments,⁹ consortia will uphold a

⁸ OMB Circular No. A-119 (Revised), *Federal Participation in the Development and Use of Voluntary Consensus Standards and in Conformity Assessment Activities*, at 1 (2017), <https://www.whitehouse.gov/wp-content/uploads/2017/11/Circular-119-1.pdf>.

⁹ A commitment to FRAND patent licensing is a broad commitment that means:

balanced intellectual property framework that supports both patent holders' rights and the wider industry's ability to build interoperable, cutting-edge AI technologies.

The federal government's role should dually focus on oversight to ensure compliance with program requirements, while also participating alongside the private sector consistent with OMB A-119.

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- **The FRAND Commitment Means All Can License** – A holder of a FRAND-committed SEP must license that SEP to all companies, organizations, and individuals who use or wish to use the standard on FRAND terms.
 - **Prohibitive Orders on FRAND-Committed SEPs Should Only Be Allowed in Rare Circumstances** – Prohibitive orders (federal district court injunctions and U.S. International Trade Commission exclusion orders) should not be sought by SEP holders or allowed for FRAND-committed SEPs except in rare circumstances where monetary remedies are not available.
 - **FRAND Royalties** – A reasonable rate for a valid, infringed, and enforceable FRAND-committed SEP should be based on the value of the actual patented invention itself, which is separate from purported value due to its inclusion in the standard, hypothetical uses downstream from the smallest saleable patent practicing unit, or other factors unrelated to invention's value.
 - **FRAND-committed SEPs Should Respect Patent Territoriality** – Patents are creatures of domestic law, and national courts should respect the jurisdiction of foreign patent laws to avoid overreach with respect to SEP remedies. Absent agreement by both parties, no court should impose global licensing terms on pain of a national injunction.
 - **The FRAND Commitment Prohibits Harmful Tying Practices** – While some licensees may wish to get broader licenses, a SEP holder that has made a FRAND commitment cannot require licensees to take or grant licenses to other patents not essential to the standard, invalid, unenforceable, and/or not infringed.
 - **The FRAND Commitment Follows the Transfer of a SEP** – As many jurisdictions have recognized, if a FRAND-committed SEP is transferred, the FRAND commitments follow the SEP in that and all subsequent transfers.

ACT appreciates the opportunity to submit its comments to ITA. We look forward to assisting in assessing the current global AI market and small businesses' concerns regarding international AI policies, regulations, and other measures which may impact U.S. exports of AI technologies.

Sincerely,



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