



October 17, 2025

Ms. Julia A. Khersonsky
Deputy Assistant Secretary for Strategic Trade
Office of Strategic Industries and Economic Security
US Department of Commerce
1401 Constitution Ave NW
Washington, DC 20230

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Director – Industrial Base Division
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BSA Comments on Section 232 Investigation re Robots and Robotic Components – Strengthening US Leadership in Embodied Artificial Intelligence

Dear Deputy Assistant Secretary Khersonsky:

The Business Software Alliance (BSA)¹ appreciates the opportunity to comment on the Department of Commerce Bureau of Industry and Security (BIS) Section 232 investigation into the national security implications of imports of robots and robotic components. BSA is the trade association of the enterprise software industry, representing companies that are leaders in artificial intelligence, cybersecurity, cloud computing, quantum, and other emerging technologies.

BSA strongly supports the Administration’s stated policy “to sustain and enhance” America’s global AI leadership in order to promote human flourishing, economic competitiveness, and national security”.² BSA also supports the goal of strengthening US technological capacity and resilience in relation to advanced robotics, particularly those that integrate higher AI-related functions. To achieve this goal, BSA urges BIS to articulate a clear and targeted exclusion from any potential trade action for imported robotics inputs essential to the research, development, and production of advanced AI-enabled robotic systems (“Essential AI Robotics Inputs”).

Strengthening US Capacity in Embodied AI

A critical goal of this section 232 investigation should be to strengthen US leadership in embodied AI, a transformative frontier of global technological competition. Embodied AI involves the integration of AI models with robotic systems capable of perceiving, reasoning, and acting in the real world. The first nation to achieve scale in embodied AI will define the future of manufacturing, logistics, healthcare, defense, and consumer automation.

¹ BSA’s members include: Adobe, Alteryx, Asana, Atlassian, Autodesk, Avalara, Bentley Systems, Box, Cisco, Cohere, Cohesity, Dassault Systemes, Databricks, Docusign, Dropbox, Elastic, EY, Graphisoft, HubSpot, IBM, Informatica, Kyndryl, MathWorks, Microsoft, Notion, Okta, OpenAI, Oracle, PagerDuty, Palo Alto Networks, PTC, Rubrik, Salesforce, SAP, ServiceNow, Shopify Inc., Siemens Industry Software Inc., Trend Micro, TriNet, Veeam, Workday, Zendesk, and Zoom Communications Inc.

² The White House, [Removing Barriers to American Leadership in Artificial Intelligence](https://www.whitehouse.gov/presidential-actions/2025/01/removing-barriers-to-american-leadership-in-artificial-intelligence/), Executive Order 14179 (Jan. 23, 2025), at <https://www.whitehouse.gov/presidential-actions/2025/01/removing-barriers-to-american-leadership-in-artificial-intelligence/>

To achieve US goals of leading in embodied AI development that integrates high-end software capabilities into advanced robotics systems, the United States must avoid unduly interrupting the flow of lower-end imported robotics components. A reliable and predictable supply of these components – sourced from different countries around the world – can help ensure that the United States has ample supply and access to components necessary to build the world’s most advanced robotics systems that integrate AI models and software capabilities in which the United States excels.

Conversely, interrupting the flow of such components to the United States could jeopardize US companies’ ability to iterate, train, and deploy embodied AI systems at pace with international competitors. In short, America’s leadership in embodied AI depends on reliable, affordable access to global robotics supply chains—particularly during this formative period of scale-up and industrial learning.

To that end, BSA urges BIS to maintain a targeted exclusion for all Essential AI Robotics Inputs – i.e., those inputs essential to the research, development, and production of AI-enabled robotic systems.³

Building Out Advanced Robotics Manufacturing Capacity in the United States

BSA supports the Administration’s ambition to increase the depth and resiliency of the US robotics manufacturing base, particularly for advanced robotics systems. BSA respectfully recommends a calibrated approach that combines strategic incentives—including tax credits, R&D funding, and infrastructure support—with continued access to foreign-sourced components during the multi-year ramp-up of domestic capacity.

Policies that enable parallel progress—strengthening US production capacity while securing ongoing US access to Essential AI Robotics Inputs—will ensure that domestic firms remain globally competitive throughout this transition. During that transition, the United States must not give up its dominant position as a preferred purchaser of such essential inputs.

Policy Recommendations

BSA recommends that BIS:

1. Explicitly exclude Essential AI Robotics Inputs from any Section 232 trade measures.
2. Engage other government agency and industry stakeholders to identify specific components for which domestic production remains unavailable or insufficient.
3. Adopt a targeted and focused approach to help fill any gaps in US manufacturing capacity, including appropriate incentives.

We thank BIS for its consideration and would welcome further engagement with your team as you develop recommendations under this investigation.

Sincerely,

Joseph Whitlock
Senior Director, Policy
BSA | The Software Alliance

³ Such inputs include, among others: (1) high-torque actuators and harmonic drives; (2) precision encoders and motor controllers; (3) sensor modules, cameras, and LiDAR; and (4) compute components and embedded processors used in robotic control systems.