



October 31, 2025

The Honorable Chuck Schumer  
Majority Leader  
US Senate  
Washington, DC 20510

The Honorable Mitch McConnell  
Minority Leader  
US Senate  
Washington, DC 20510

The Honorable Mike Johnson  
Speaker  
US House of Representatives  
Washington, DC 20515

The Honorable Hakeem Jeffries  
Minority Leader  
US House of Representatives  
Washington, DC 20515

The Honorable Jack Reed  
Chairman  
US Senate Armed Services Committee  
Washington, DC 20510

The Honorable Roger Wicker  
Ranking Member  
US Senate Armed Services Committee  
Washington, DC 20510

The Honorable Mike Rogers  
Chairman  
US House Armed Services Committee  
Washington, DC 20515

The Honorable Adam Smith  
Ranking Member  
US House Armed Services Committee  
Washington, DC 20515

Dear Majority Leader Schumer, Minority Leader McConnell, Speaker Johnson, Minority Leader Jeffries, Chairman Reed, Ranking Member Wicker, Chairman Rogers, and Ranking Member Smith:

On behalf of BSA | The Software Alliance, I would like to draw your attention to several important topics that will arise during the House and Senate's deliberations of the National Defense Authorization Act (NDAA) for Fiscal Year 2025. We ask that you review the following recommendations about specific provisions that have been included, or may be under consideration for inclusion, in the final legislation. We appreciate your leadership on this legislation as these provisions have the potential to significantly impact the enterprise software industry and the federal government.

BSA is the leading trade association representing the global enterprise software and technology industry.<sup>1</sup> Digital transformation, and the software that enables it, is essential to businesses of all sizes and in every industry. Our members provide cutting-edge cloud services, data analytics, manufacturing and infrastructure tools, and other digital capabilities to help businesses modernize and grow.

The Department of Defense (DoD) is both the Federal government's largest department and the leading innovator of security technologies. Our members are focused on supporting the DoD's (and other agencies') digital transformation, which means providing the products and services the DoD needs to complete its missions effectively and efficiently today and well into the future.

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<sup>1</sup> BSA's members include: Adobe, Alteryx, Asana, Atlassian, Autodesk, Bentley Systems, Box, Cisco, CNC/Mastercam, Cohere, Databricks, DocuSign, Dropbox, Elastic, EY, Graphisoft, HubSpot, IBM, Informatica, Kyndryl, MathWorks, Microsoft, Notion, Okta, OpenAI, Oracle, PagerDuty, Palo Alto Networks, Prokon, Rubrik, Salesforce, SAP, ServiceNow, Shopify Inc., Siemens Industry Software Inc., Splunk, Trend Micro, Trimble Solutions Corporation, TriNet, Twilio, Workday, Zendesk, and Zoom Video Communications, Inc.

Earlier this year, we wrote to the Armed Services Committees about our priorities for this year's legislation to advance multi-cloud technology, Artificial Intelligence, cybersecurity, and harness digital transformation at the DoD, and we are grateful that many of these priorities were addressed in the legislation. As the negotiations proceed between the House and Senate, we urge you to continue to attend to those and other priorities, addressed below.

We have focused our recommendations to address provisions in H.R. 8070 and S.4638.

### ***Expansion and Oversight of Multi-Cloud Technology Throughout the DoD***

- To help address threats from geopolitical adversaries, the US government needs to leverage the panoply of cloud solutions that foster innovation and reduce the government's total cost of acquisition.

Infrastructure-as-a-service (IaaS), platform-as-a-service (PaaS), and software-as-a-service (SaaS) have proven to be effective and efficient ways to upgrade federal information technology. Currently, however, guidance promoting these solutions, particularly in connection with multi-cloud solutions, is lacking. Multi-cloud solutions enhance the beneficial effects of cloud computing (improved cybersecurity, resiliency, redundancy, and access to artificial intelligence enabled by cloud computing). They encourage cost competition, allow for diversified applications and solutions, and facilitate system interoperability, which can enhance resiliency. They also reduce the risk of vendor lock-in created by the concentration of government data in one cloud service provider.

BSA strongly advocates for the use of multi-cloud across the entire federal government. One way to assist in the adoption of multi-cloud would be to include report language that requires the General Accountability Office (GAO) to produce a study on best practices by agencies moving to multi-cloud. Our proposed language to include with **Senate Section 810** follows:

"The conferees note the importance of advancing Federal Government innovation using AI through multi-cloud technology and direct the General Accountability Office (GA) to study the use by agencies of multi-cloud technology to identify agency best practices for adopting, implementing, and managing multi-cloud technology. The GAO shall provide the Committees on Armed Services of the Senate and House of Representatives with a report no later than January 1, 2026."

Senate Section 810 in S.4638 enables several positive outcomes for the Executive Branch as it seeks to promote artificial intelligence while also elevating the need for multi-cloud procurement. **BSA supports Senate Section 810 to ensure competition in AI procurement while also creating the infrastructure for utilization of AI in the DoD, while including the report language into the final bill.**

- BSA supports the Department's efforts to expand the cloud capabilities across the services. BSA supports the competition between Joint Warfighter Cloud Capability (JWCC) awardees and wants to make sure that the marketplace is vibrant. Public reporting will help to ensure competition across the contracts. **BSA supports Senate Section 884 that requires public reporting on the task orders awarded under JWCC.**
- With cloud infrastructure adoption accelerating at a rapid pace, CIOs must be vigilant to the new threat vectors, expanded attack surface, and the additional security data monitoring workload that comes with securing new cloud infrastructure. Planning for cloud security by adopting cutting edge, DoD network-authorized Cloud Native Application Protection Platforms (CNAPP) will ensure DoD's cloud infrastructure can efficiently and effectively serve the warfighter without taking on unintended cybersecurity risk. DoD must pair its multi-cloud migration with effective cloud native security solutions that secure applications by design;

ensure DoD network defenders maintain continuous visibility and control over cloud-centric misconfigurations, privileges, data, and vulnerabilities; and provide continuous, real-time protection for cloud workloads, applications, and APIs, regardless of network location. **BSA supports the House report language and Senate Section 1612, which requires the DoD CIO to develop a strategy on JWCC to incorporate zero-trust, standardize user identities, and increase AI applications in the JWCC and other multi-cloud environments. BSA asks that the committee include both pieces within the final bill.**

- BSA appreciates the concern that the Committee has with international competition. However, the language in Senate Section 885: Phase-Out of Computers or Printers Acquisition involving Entitles Owned or Controlled by China is over-broad in scope and pulls in IT infrastructure beyond the intended scope. This language would require a graduated phase out of DoD acquisitions of printers and computers from Chinese entities. The schedule would mandate 10% non-China threshold in FY26, increasing to 95% non-China by 2029. As with the House provision from FY 24, "manufacturer" is broadly defined to include the entity that transforms components into an end item, and an entity that subcontracts the manufacturing to an entity in China or directs manufacturing in China. "Computers" are defined to include personal devices but also cloud-based data storage facilities, defined as "data processing devices performing storage functions, including a data storage facility." **BSA urges the Senate and House to modify Senate Section 885 to clearly exclude cloud services from the scope and to modify the definition of manufacturer to carve out entities with a U.S. parent.**

### **Artificial Intelligence**

BSA members are on the leading edge of providing artificial intelligence (AI)-enabled products and services. They are at the forefront of the responsible development of AI, providing trusted software solutions that enable enterprises to harness the power of the technology to improve their operations and services. They have unique insights into enterprise AI's tremendous potential to further spur digital transformation in the private and public sectors and the policies that can best support the responsible use of AI.

- As the need for digital transformation accelerates with the new technology, it is more important than ever to broaden opportunities, promote alternative paths, improve training programs, and expedite the development of the diverse workforce needed to secure our shared future. Section 231 in the NDAA requires DoD to identify and brief on the Department's AI workforce. **BSA believes that a strong workforce is imperative for DoD to successfully use AI and supports the continued inclusion of Senate Section 231 in the final package.**
- BSA also supports the adoption and acceleration of the Department of Defense's use of large language models (LLMs) and the development of use cases call for in the House Section 1538. **BSA urges the Committees to support the inclusion of House Section 1538 language in the final bill.**
- BSA applauds the House's leadership in building the cyber workforce of the present and future by increasing cyber-related educational opportunities through the report language in Section 248. The report will help to identify potential gaps in the skills and training of the workforce which will allow for increased use of AI by DoD staff. **BSA urges the Committees to support House Section 248 report language.**

### **Quantum**

- BSA believes that the emergence of quantum computers will create a technological leap forward. Both the federal government and industry are investing heavily and working diligently to tap the full potential. **BSA supports this critical effort outlined in House Section 220 Measures to Advance Quantum Information Science within the Department of Defense and calls for maintained inclusion in the bill.**

### ***Outbound Investment and Export Controls***

- BSA strongly supports security in cloud computing and is pleased to work with Congress on a variety of efforts in this area. However, we caution Congress to carefully consider the unintended consequences that overbroad provisions may have on legitimate U.S. business interests. Any outbound investment or export control proposals should be narrowly scoped to address demonstrated national security concerns.

### ***Cybersecurity***

- BSA applauds the Committee's encouragement for the DoD to use Authorizations-to-Operate (ATOs) granted by one department across all departments in the DoD. This allows for speed of use of new technologies across the DoD. BSA urges the Committees to update the language to include all software, not just cloud based software, so that ATOs may be used quickly and efficiently across the DOD. **BSA supports inclusion of the language in the Senate Section 1621 and House Section 1522 with the additional clarification outlined.**

Thank you for your time and consideration of the above-mentioned recommendations, and we would welcome the opportunity to work with you and your staff to address these priorities in the final version of the FY25 NDAA. Thank you for your leadership, and we look forward to working with you.

Sincerely,



Victoria A. Espinel  
President and CEO