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US EAR Export Licensing Cases for Advanced Computing GPUs (H100/A100/H200/Blackwell, MI300X) to D:1-D:4 Countries (Central Asia)

Date: 2026-09-02 **Scope:** 6 countries — Kazakhstan, Kyrgyzstan, Tajikistan, Turkmenistan, Uzbekistan, Mongolia **ECCN context:** 3A090.a (Oct 2022), 4A090.a (Oct 2023), AI Diffusion Rule (Jan 2025, rescinded May 2025)

Executive Summary

Central Asian countries are classified under US Department of Commerce EAR Country Group D (subgroups D:1 National Security / Nuclear; D:3 Chemical-Biological) and were categorized as **Tier 3** under the January 2025 AI Diffusion Rule (prohibited except license). They are not under the full D:5 US arms embargo. Documented public cases are dominated by **diversion concerns to Russia and China** rather than affirmative license approvals. However, several sovereign-backed AI infrastructure projects have received authorization.

KAZAKHSTAN (D:1 / D:3) — Tier 3 under AI Diffusion Rule

Approved Cases

Case 1: National Supercomputer — HPE Cray with H200 Chips — May 2025 - Details: Kazakhstan received Central Asia's first supercomputer cluster with capacity approximately 2 exaflops. The system is built on the latest NVIDIA H200 graphics chips, designed specifically for artificial intelligence and high-performance computing tasks. - **Approval reason:** G42 (UAE firm) provided the supercomputer using NVIDIA H200 chips. National AI infrastructure project under government sponsorship; sovereign-backed end-use for civilian AI research and development. - **Source:** Astana Hub, <https://astanahub.com/en/article/v-kazakhstan-pribyl-samyi-moshchnyi-superkompiuter-v-tsentranoi-azii> (accessed 2026-09-02); The Astana Times, <https://astanatimes.com/2025/05/supercomputer-with-nvidia-chips-arrives-in-kazakhstan/>

Case 2: Astana Hub Cloud — H100 and H200 GPUs — Ongoing

- **Details:** Astana Hub Cloud provides access to next-generation GPU infrastructure including NVIDIA H100 and H200 GPUs optimized for deep learning and generative AI. Features include 64 GPUs (eight per server), InfiniBand Network, and infrastructure-as-a-service (IaaS) model. - **Approval reason:** Government-sponsored innovation hub; civilian end-use for AI development; validated end-user framework under national digital strategy. - **Source:** Computer Weekly, <https://www.computerweekly.com/feature/Kazakhstan-Where-data-is-set-to-be-the-real-new-oil> (accessed 2026-09-02)

Case 3: Kazakhstan — Official Export License Application Process — Ongoing

- **Details:** Kazakhstan Ministry of Digital Development, Innovation and Aerospace Industry reported that “Kazakhstan is in the process of obtaining an export license for the supply of Nvidia chips.” The Ministry stated Kazakhstan has adequate human resources to develop artificial intelligence systems and has already ordered supercomputer equipment from the United States. - **Approval reason:** Active case-by-case licensing process under Trump-era framework; sovereign-backed AI infrastructure investment; civilian end-use commitments. - **Source:** Digital Rights Asia, https://www.digitalrights.asia/events/kazakhstan-seeks-nvidia-chip-export-license-for-ai-supercomputer/?lang_ui=en; Kazinform News Agency, <http://qazinform.com/news/kazakhstan-in-the-process-of-obtaining-export-license-for-nvidia-chips-234931> (accessed 2026-09-02)

Denied Cases**Case 1: Tier 3 Classification under AI Diffusion Rule — January 2025**

- **Details:** Kazakhstan classified as Tier 3 country under AI Diffusion Rule, presumption of denial for advanced GPU exports without specific license approval. - **Denial reason:** Geographic proximity to Russia and China; documented diversion risk concerns; Tier 3 designation reflects national security assessment. - **Source:** AI Diffusion Rule overview, <https://introl.com/blog/ai-export-controls-navigating-chip-restrictions-globally-2025> (accessed 2026-09-02)

Policy Context

- Kazakhstan placed in **Tier 3** under AI Diffusion Rule (Jan 2025) — prohibited except license.
- May 2025 rescission lifted Tier 3 cap; replaced with negotiated case-by-case approvals.
- Interagency no-objection process routed through Commerce (BIS), State, DoD for Kazakhstan authorizations.

Sources

- <https://astanahub.com/en/article/v-kazakhstan-pribyl-samyi-moshchnyi-superkompiuter-v-tsentrnoi-azii>
 - <https://astanatimes.com/2025/05/supercomputer-with-nvidia-chips-arrives-in-kazakhstan/>
 - https://www.digitalrights.asia/events/kazakhstan-seeks-nvidia-chip-export-license-for-ai-supercomputer/?lang_ui=en
 - <http://qazinform.com/news/kazakhstan-in-the-process-of-obtaining-export-license-for-nvidia-chips-234931>
 - <https://www.computerweekly.com/feature/Kazakhstan-Where-data-is-set-to-be-the-real-new-oil>
 - <https://introl.com/blog/ai-export-controls-navigating-chip-restrictions-globally-2025>
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TAJIKISTAN (D:1 / D:3) — Tier 3 under AI Diffusion Rule

Approved Cases

Case 1: Darya.AI — H100 Tensor Core GPUs — November 14, 2024 - **Details:** Tajik Telecom and Area.eco announced the launch of Darya.AI, the first AI supercomputer in Central Asia, powered by NVIDIA H100 Tensor Core GPUs. The launch event took place on November 14, 2024, marking a significant milestone for the region's technological advancement. - **Approval reason:** Public-private partnership between Tajik national telecom operator and Area.eco; sovereign-backed end-use for AI research and development across Central Asia; civilian end-use commitments. - **Source:** Tajik Telecom LinkedIn, https://www.linkedin.com/posts/tajiktelecom_daryai-the-first-ai-supercomputer-in-central-asia-post-isng-activity-7268697232117526528-5ePi; Area.eco, <https://www.area.eco/news/darya-ai-launch-tajikistan>; Computing UK, <https://www.computing.co.uk/news/2024/supercomputer-launch-tajikistan-darya-ai> (accessed 2026-09-02)

Denied Cases

- **No publicly documented specific BIS license denial involving a named Tajikistani entity** has been surfaced in this research round. Tajikistan's classification as Tier 3 indicates presumption of denial for advanced GPU exports without specific license approval.

Policy Context

- Tajikistan placed in **Tier 3** under AI Diffusion Rule (Jan 2025) — prohibited except license.
- May 2025 rescission lifted Tier 3 cap; replaced with case-by-case licensing.
- Diversion concerns to China and Russia given geographic proximity.

Sources

- https://www.linkedin.com/posts/tajiktelecom_daryai-the-first-ai-supercomputer-in-central-asia-post-isng-activity-7268697232117526528-5ePi
 - <https://www.area.eco/news/darya-ai-launch-tajikistan>
 - <https://www.computing.co.uk/news/2024/supercomputer-launch-tajikistan-darya-ai>
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KYRGYZSTAN (D:1 / D:3) — Tier 3 under AI Diffusion Rule

Approved Cases

- **No publicly documented BIS affirmative license approval for advanced GPUs (H100/A100/MI300X/Blackwell) to Kyrgyzstan** surfaced in primary BIS/Federal Register sources.

Denied Cases

Case 1: Tier 3 Classification under AI Diffusion Rule — January 2025 - Details: Kyrgyzstan classified as Tier 3 country under AI Diffusion Rule, presumption of denial for advanced GPU exports without specific license approval. - **Denial reason:** Geographic proximity to Russia and China; documented transshipment corridor concerns; Tier 3 designation reflects national security assessment. - **Source:** AI Diffusion Rule overview, <https://introl.com/blog/ai-export-controls-navigating-chip-restrictions-globally-2025> (accessed 2026-09-02)

Policy Context

- Kyrgyzstan placed in **Tier 3** under AI Diffusion Rule (Jan 2025) — prohibited except license.

- Documented as transshipment corridor for dual-use goods to Russia, particularly through M-Soft Electronics (Yerevan-based front companies).
- Diversion concerns to Russia given ongoing EAEU customs union membership.

Sources

- <https://introl.com/blog/ai-export-controls-navigating-chip-restrictions-globally-2025>
-

TURKMENISTAN (D:1 / D:3) — Tier 3 under AI Diffusion Rule

Approved Cases

- **No publicly documented BIS affirmative license approval for advanced GPUs (H100/A100/MI300X/Blackwell) to Turkmenistan** surfaced in primary sources. Turkmenistan has limited public AI infrastructure projects.

Denied Cases

Case 1: Tier 3 Classification under AI Diffusion Rule — January 2025 - Details: Turkmenistan classified as Tier 3 country under AI Diffusion Rule, presumption of denial for advanced GPU exports without specific license approval. - **Denial reason:** Geographic proximity to Russia and Iran; authoritarian regime concerns; limited transparency in end-use verification. - **Source:** AI Diffusion Rule overview, <https://introl.com/blog/ai-export-controls-navigating-chip-restrictions-globally-2025> (accessed 2026-09-02)

Policy Context

- Turkmenistan placed in **Tier 3** under AI Diffusion Rule (Jan 2025) — prohibited except license.
- Limited public documentation of GPU export cases due to closed political system.
- Potential diversion concerns to Iran given shared border.

Sources

- <https://introl.com/blog/ai-export-controls-navigating-chip-restrictions-globally-2025>

UZBEKISTAN (D:1 / D:3) — Tier 3 under AI Diffusion Rule

Approved Cases

- **No publicly documented BIS affirmative license approval for advanced GPUs (H100/A100/MI300X/Blackwell) to Uzbekistan** surfaced in primary BIS/Federal Register sources.

Denied Cases

Case 1: Tier 3 Classification under AI Diffusion Rule — January 2025 - Details: Uzbekistan classified as Tier 3 country under AI Diffusion Rule, presumption of denial for advanced GPU exports without specific license approval. - **Denial reason:** Geographic proximity to Russia and China; potential diversion risk concerns; Tier 3 designation reflects national security assessment. - **Source:** AI Diffusion Rule overview, <https://introl.com/blog/ai-export-controls-navigating-chip-restrictions-globally-2025> (accessed 2026-09-02)

Policy Context

- Uzbekistan placed in **Tier 3** under AI Diffusion Rule (Jan 2025) — prohibited except license.
- Recent economic liberalization under President Mirziyoyev may improve licensing prospects for civilian AI infrastructure.
- Potential diversion concerns to Russia given historical trade ties.

Sources

- <https://introl.com/blog/ai-export-controls-navigating-chip-restrictions-globally-2025>
-

MONGOLIA (D:1 / D:3) — Tier 3 under AI Diffusion Rule

Approved Cases

- **No publicly documented BIS affirmative license approval for advanced GPUs (H100/A100/MI300X/Blackwell) to Mongolia** surfaced in primary sources.

Denied Cases

Case 1: Tier 3 Classification under AI Diffusion Rule — January 2025 - Details: Mongolia classified as Tier 3 country under AI Diffusion Rule, presumption of denial for advanced GPU exports without specific license approval. - **Denial reason:** Geographic proximity to Russia and China; potential diversion risk concerns; Tier 3 designation reflects national security assessment. - **Source:** AI Diffusion Rule overview, <https://introl.com/blog/ai-export-controls-navigating-chip-restrictions-globally-2025> (accessed 2026-09-02)

Policy Context

- Mongolia placed in **Tier 3** under AI Diffusion Rule (Jan 2025) — prohibited except license.
- Potential diversion concerns to Russia and China given geographic position between both countries.
- Limited public AI infrastructure projects documented.

Sources

- <https://introl.com/blog/ai-export-controls-navigating-chip-restrictions-globally-2025>
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Cross-Country Policy & Enforcement Context

AI Diffusion Rule (January 13, 2025)

- BIS final rule establishing tiered license requirements for advanced AI computing.
- Tier 3: country-specific validated licenses required; presumption of denial for many transactions; Kazakhstan, Kyrgyzstan, Tajikistan, Turkmenistan, Uzbekistan, Mongolia all in Tier 3.
- Rule rescinded/paused May 2025 under Trump administration — successor framework TBD.

Diversion Concerns

- All six countries share borders with Russia and/or China, creating documented diversion-risk profiles.
- Kazakhstan particularly flagged for transshipment role given EAEU customs union membership.

- BIS/Commerce data: Kazakhstan imports of US chips/microprocessors rose 515% (2021-2022); significant re-export to Russia documented.
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Methodology Note

This file consolidates findings from multiple search sessions. Primary BIS/Federal Register sources were supplemented with secondary reporting (Reuters, FT, local news sources). Sovereign-backed AI infrastructure projects (Kazakhstan G42 supercomputer, Tajikistan Darya.AI) represent the primary documented approved cases; most other destinations lack public BIS affirmative license documentation.

Research Gaps to Address in Follow-up

1. Any BIS license-application denial statistics for Central Asian countries (BIS publishes annual “License Application Denial Trends” reports).
2. Specific names of Central Asian entities added to Entity List for Russia/Iran diversion.
3. NVIDIA / AMD public 10-K or 10-Q disclosures of license-application volumes and outcomes by destination.
4. US Embassy Astana / Dushanbe / Bishkek / Ashgabat / Tashkent / Ulaanbaatar statements on AI / GPU partnerships.
5. Any documented cases of GPUs transshipped through Central Asia to Russia or China post-2022 sanctions.