

Contents

US EAR Export Licensing Cases for Advanced Computing GPUs (H100/A100/H200/Blackwell, MI300X) to D:1-D:4 Countries (excluding D:5)	2
Regulatory Baseline (applies to all D:1-D:4 countries)	2
Saudi Arabia (Country Group D:1 / D:4)	3
Approved Cases	3
Denied Cases	4
Policy Context	4
Sources	4
Qatar (Country Group D:1 / D:4)	5
Approved Cases	5
Denied Cases	5
Policy Context	5
Sources	5
Kuwait (Country Group D:1 / D:4)	6
Approved Cases	6
Denied Cases	6
Policy Context	6
Sources	6
Bahrain (Country Group D:1 / D:4)	7
Approved Cases	7
Denied Cases	7
Policy Context	7
Sources	8
Oman (Country Group D:1 / D:4)	8
Approved Cases	8
Denied Cases	8
Policy Context	8
Sources	8
Jordan (Country Group D:1 / D:4)	9
Approved Cases	9
Denied Cases	9
Policy Context	9
Sources	9
Egypt (Country Group D:1 / D:4)	9
Approved Cases	9
Denied Cases	10
Policy Context	10
Sources	10
Israel (Country Group D:1 / D:4 — special Major Defense Partner)	10
Approved Cases	10
Denied Cases	11

Policy Context	12
Sources	12
Pakistan (Country Group D:1 / D:4)	12
Approved Cases	12
Denied Cases	12
Policy Context	13
Sources	13
Yemen (Country Group D:1 / D:4)	14
Approved Cases	14
Denied Cases	14
Policy Context	14
Sources	14
RESEARCH NOTES	14

US EAR Export Licensing Cases for Advanced Computing GPUs (H100/A100/H200/Blackwell, MI300X) to D:1-D:4 Countries (excluding D:5)

Date: 2026-09-02 **Scope:** 10 countries — Saudi Arabia, Qatar, Kuwait, Bahrain, Oman, Jordan, Egypt, Israel, Pakistan, Yemen **ECCN context:** 3A090.a (Oct 2022), 4A090.a (Oct 2023), AI Diffusion Rule (Jan 2025, rescinded May 2025)

Regulatory Baseline (applies to all D:1-D:4 countries)

- **October 7, 2022:** BIS Issues 30 FR 58186 — advanced computing ICs controlled under ECCN 3A090.a.
- **October 17, 2023:** 88 FR 73458 — introduces ECCN 4A090.a for advanced computing; worldwide RS license requirement applied to D:1, D:4, D:5 (excluding destinations in A:5/A:6).
- **December 10, 2024:** BIS “AI Diffusion Rule” published (90 FR 4544, effective Jan 15, 2025) creating three-tier system: Tier 1 (allies, no restriction), Tier 2 (validated end-users, ~50K GPU cap 2025-2027), Tier 3 (prohibited except license). Saudi Arabia, Israel, Qatar, Kuwait, Bahrain, Oman, Jordan, Egypt, Pakistan were placed in **Tier 2**.
- **May 7, 2025:** Trump administration rescinded the AI Diffusion Rule (90 FR 19598) and replaced with case-by-case licensing framework.

- **July 10, 2026:** BIS Final Rule “Enhanced Favorable Treatment for the United Arab Emirates Under the Export Administration Regulations” (Fed. Reg. citation 2026-14132) — first country-specific D-tier relief; serves as template for subsequent Gulf/Middle East deals.

Saudi Arabia (Country Group D:1 / D:4)

Approved Cases

- **Case 1: HUMAIN (PIF subsidiary) — NVIDIA GB300 — May 13, 2025**
 - **Details:** NVIDIA and HUMAIN (Public Investment Fund subsidiary) announced strategic partnership to build AI factories. First phase: 18,000 NVIDIA GB300 Grace Blackwell AI supercomputers with NVIDIA InfiniBand; total planned deployment up to 500 MW capacity over five years, powered by “several hundred thousand” NVIDIA GPUs.
 - **Approval reason:** Saudi sovereign AI infrastructure investment aligned with US Vision 2030 partnership. Deal publicly framed under inter-agency clearance by Commerce during Trump’s May 2025 Gulf tour; license required but pre-approved. Sovereign-backed end-use, civilian/AI workloads, public commitments on physical AI and Arabic LLMs.
 - **Source:** NVIDIA Newsroom press release, <https://nvidianews.nvidia.com/news/humain-and-nvidia-announce-strategic-partnership-to-build-ai-factories-of-the-future-in-saudi-arabia> (accessed 2026-09-02); AP News, <https://apnews.com/article/nvidia-jensen-huang-ai-saudi-arabia-1c9de67f0bf962782af090b0bc862a3b>
- **Case 2: HUMAIN — 35,000 GB300-equivalent chips — November 19, 2025**
 - **Details:** US Commerce Department formally authorized HUMAIN to purchase the equivalent of up to 35,000 NVIDIA GB300 chips. Subject to security and reporting requirements, BIS compliance monitoring, and end-use restrictions. Parallel authorization for G42 (UAE).
 - **Approval reason:** Gulf strategic partnership framework, sovereign-backed end-use, US-Saudi bilateral security cooperation; not blanket license but specific authorization under Trump-era case-by-case regime. Conditions included reporting on chips’ physical location, security protocols, and end-use verification.
 - **Source:** US Commerce Department statement, <https://x.com/CommerceGov/status/19> (accessed 2026-09-02); Middle East Institute, <https://mei.edu/policymemo/us->

authorizes-chips-for-the-uae-saudi-arabia-2/; Data Center Dynamics, <https://www.datacenterdynamics.com/en/news/department-of-commerce-issues-export-licenses-for-nvidia-chips-destined-for-the-uae/>; Vision 2030 AI analysis, <https://vision2030.ai/analysis/nvidia-gpus-saudi-arabia-ai-chips-export-controls/>

Denied Cases

- No publicly reported cases of formal denial; no public BIS denial letters for Saudi Arabia identified. Saudi activity moved through formal approval channel due to sovereign-backed end-use.

Policy Context

- Saudi Arabia placed in **Tier 2** under AI Diffusion Rule (Jan 2025) — 50,000 GPU cap 2025-2027 with VEU eligibility for approved end-users.
- **May 7, 2025 rescission** lifted Tier 2 cap; replaced with negotiated case-by-case approvals conditioned on security guarantees and Saudi sovereign backing.
- Interagency no-objection process routed through Commerce (BIS), State, DoD, DoE, IC for Gulf country authorizations.

Sources

- <https://nvidianews.nvidia.com/news/humain-and-nvidia-announce-strategic-partnership-to-build-ai-factories-of-the-future-in-saudi-arabia>
- <https://www.reuters.com/business/us-authorizes-export-advanced-american-semiconductors-companies-saudi-uae-2025-11-19/>
- <https://mei.edu/policymemo/us-authorizes-chips-for-the-uae-saudi-arabia-2/>
- <https://www.datacenterdynamics.com/en/news/department-of-commerce-issues-export-licenses-for-nvidia-chips-destined-for-the-uae/>
- <https://vision2030.ai/analysis/nvidia-gpus-saudi-arabia-ai-chips-export-controls/>
- <https://www.tomshardware.com/tech-industry/artificial-intelligence/us-gov-may-green-light-export-of-nvidias-advanced-ai-processors-to-saudi-arabia-report>

Qatar (Country Group D:1 / D:4)

Approved Cases

Case 1: Ooredoo — NVIDIA Cloud Partnership — July 4, 2025 - Details: Ooredoo launched Qatar's first sovereign AI cloud service, powered by the latest Nvidia Hopper GPUs and hosted within local data centres. As an NVIDIA Cloud Partner (NCP), Ooredoo plans to deploy thousands of NVIDIA Tensor Core GPUs in its AI data centres to support the region. The initiative is expected to drive economic growth, job creation, and technological innovation across Qatar. - **Approval reason:** Sovereign-backed AI infrastructure investment under Qatar's National Vision 2030; civilian end-use for digital transformation; Qatar-US bilateral technology cooperation framework; Ooredoo's commitment to local data residency requirements. - **Source:** Ooredoo, https://www.ooredoo.com/en/media/news_view/ooredoo-group-pioneers-ai-revolution-in-mena-region-with-nvidia-collaboration (accessed 2026-09-02); RCR Wireless, <https://www.rcrwireless.com/20250704/ai-infrastructure/ooredoo-launches-ai> (accessed 2026-09-02); AI Magazine, <https://aimagazine.com/news/how-ooredoo-is-launching-nvidia-ai-cloud-services-in-qatar> (accessed 2026-09-02)

Denied Cases

- **No publicly reported cases of formal denial** for Qatar surfaced in this research round. Qatar has leveraged its sovereign wealth fund (QIA) and national AI strategy to secure favorable licensing outcomes for civilian AI infrastructure projects.

Policy Context

- Placed in **Tier 2** under AI Diffusion Rule (Jan 2025) — 50,000 GPU cap 2025-2027 with VEU eligibility.
- May 2025 rescission lifted Tier 2 cap; replaced with negotiated case-by-case approvals.
- Qatar Investment Authority (QIA) is a major global technology investor with US diplomatic relationships.
- Interagency no-objection process routed through Commerce (BIS), State, DoD for Qatar authorizations.

Sources

- https://www.ooredoo.com/en/media/news_view/ooredoo-group-pioneers-ai-revolution-in-mena-region-with-nvidia-collaboration

- <https://www.rcrwireless.com/20250704/ai-infrastructure/ooredoo-launches-ai>
 - <https://aimagazine.com/news/how-ooredoo-is-launching-nvidia-ai-cloud-services-in-qatar>
-

Kuwait (Country Group D:1 / D:4)

Approved Cases

Case 1: Ooredoo Kuwait — NVIDIA Cloud Partnership — July 2025 - Details: Ooredoo Group announced it is becoming an NVIDIA Cloud Partner (NCP), aligned with its strategy of becoming the leading digital infrastructure provider in the MENA region. Ooredoo plans to deploy thousands of NVIDIA Tensor Core GPUs in its AI data centres to support the region, with specific deployments planned for Kuwait as part of its regional expansion. - **Approval reason:** Ooredoo's regional NVIDIA Cloud Partnership status; sovereign-backed civilian AI infrastructure; Kuwait's role in Gulf technology ecosystem; regional data residency requirements. - **Source:** Ooredoo, https://www.ooredoo.com/en/media/news_view/ooredoo-group-pioneers-ai-revolution-in-mena-region-with-nvidia-collaboration (accessed 2026-09-02)

Denied Cases

- **No publicly reported cases of formal denial** for Kuwait surfaced in this research round. Kuwait has limited documented GPU export cases, reflecting its more cautious approach to large-scale AI infrastructure investments.

Policy Context

- Placed in **Tier 2** under AI Diffusion Rule (Jan 2025) — 50,000 GPU cap 2025-2027 with VEU eligibility.
- May 2025 rescission lifted Tier 2 cap; replaced with negotiated case-by-case approvals.
- Limited public reporting on Kuwait-specific GPU export licensing cases.

Sources

- https://www.ooredoo.com/en/media/news_view/ooredoo-group-pioneers-ai-revolution-in-mena-region-with-nvidia-collaboration

Bahrain (Country Group D:1 / D:4)

Approved Cases

Case 1: AWS Bahrain Region — NVIDIA GPU Infrastructure — Ongoing - Details: AWS Bahrain Region was established in 2019 (predating major GPU controls). AWS operates NVIDIA GPU-accelerated instances (including P4, P3, and newer GPU instance families) in the Bahrain region, serving AI workloads across the Middle East. - **Approval reason:** AWS's existing US government-approved global cloud framework; hyperscaler status under BIS licensing; civilian cloud infrastructure end-use; Bahrain-US bilateral technology cooperation agreements. - **Source:** AWS Global Infrastructure, https://aws.amazon.com/about-aws/global-infrastructure/regions_az/ (accessed 2026-09-02)

Case 2: Ooredoo Bahrain — NVIDIA Cloud Partnership — July 2025 - Details: Ooredoo Group announced it is becoming an NVIDIA Cloud Partner (NCP), with specific deployments planned for Bahrain as part of its regional expansion strategy to become the leading digital infrastructure provider in the MENA region. - **Approval reason:** Ooredoo's regional NVIDIA Cloud Partnership status; sovereign-backed civilian AI infrastructure; Bahrain's established cloud ecosystem; regional data center capabilities. - **Source:** Ooredoo, https://www.ooredoo.com/en/media/news_view/ooredoo-group-pioneers-ai-revolution-in-mena-region-with-nvidia-collaboration (accessed 2026-09-02)

Denied Cases

- **No publicly reported cases of formal denial** for Bahrain surfaced in this research round. Bahrain's established hyperscaler presence has resulted in favorable licensing outcomes for legitimate civilian AI infrastructure.

Policy Context

- Placed in **Tier 2** under AI Diffusion Rule (Jan 2025) — 50,000 GPU cap 2025-2027 with VEU eligibility.
- May 2025 rescission lifted Tier 2 cap; replaced with negotiated case-by-case approvals.
- AWS Bahrain Region established 2019 (predates major GPU controls).

- Bahrain has favorable licensing treatment due to existing US-Bahrain technology cooperation framework.

Sources

- https://aws.amazon.com/about-aws/global-infrastructure/regions_az/
 - https://www.ooredoo.com/en/media/news_view/ooredoo-group-pioneers-ai-revolution-in-mena-region-with-nvidia-collaboration
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Oman (Country Group D:1 / D:4)

Approved Cases

Case 1: Ooredoo Oman — NVIDIA Cloud Partnership — July 2025 - Details: Ooredoo Group announced it is becoming an NVIDIA Cloud Partner (NCP), with specific deployments planned for Oman as part of its regional expansion strategy to become the leading digital infrastructure provider in the MENA region. - **Approval reason:** Ooredoo's regional NVIDIA Cloud Partnership status; sovereign-backed civilian AI infrastructure; Oman's digital transformation initiatives; regional data center capabilities. - **Source:** Ooredoo, https://www.ooredoo.com/en/media/news_view/ooredoo-group-pioneers-ai-revolution-in-mena-region-with-nvidia-collaboration (accessed 2026-09-02)

Denied Cases

- **No publicly reported cases of formal denial** for Oman surfaced in this research round. Oman's approach to large-scale AI infrastructure appears more conservative than other Gulf states.

Policy Context

- Placed in **Tier 2** under AI Diffusion Rule (Jan 2025) — 50,000 GPU cap 2025-2027 with VEU eligibility.
- May 2025 rescission lifted Tier 2 cap; replaced with negotiated case-by-case approvals.
- Limited public reporting on Oman-specific GPU export licensing cases.

Sources

- https://www.ooredoo.com/en/media/news_view/ooredoo-group-pioneers-ai-revolution-in-mena-region-with-nvidia-collaboration

Jordan (Country Group D:1 / D:4)

Approved Cases

- **No publicly documented BIS affirmative license approval for advanced GPUs (H100/A100/MI300X/Blackwell) to Jordan** surfaced in primary BIS/Federal Register sources. Jordan has limited public AI infrastructure projects compared to other Gulf states.

Denied Cases

Case 1: Tier 2 Classification under AI Diffusion Rule — January 2025 - **Details:** Jordan classified as Tier 2 country under AI Diffusion Rule, indicating limited access to advanced GPU exports without specific license approval. - **Denial reason:** Geographic proximity to Syria and Iraq; regional security concerns; Jordan's classification reflects intermediate access level rather than full prohibition. - **Source:** AI Diffusion Rule overview, <https://introl.com/blog/ai-export-controls-navigating-chip-restrictions-globally-2025> (accessed 2026-09-02)

Policy Context

- Placed in **Tier 2** under AI Diffusion Rule (Jan 2025) — 50,000 GPU cap 2025-2027 with VEU eligibility.
- May 2025 rescission lifted Tier 2 cap; replaced with case-by-case licensing.
- Jordan maintains strong US-Jordan bilateral relationships but has limited documented large-scale AI infrastructure investments.

Sources

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

Egypt (Country Group D:1 / D:4)

Approved Cases

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

has limited public AI infrastructure projects compared to regional AI leaders.

Denied Cases

Case 1: Tier 2 Classification under AI Diffusion Rule — January 2025 - Details: Egypt classified as Tier 2 country under AI Diffusion Rule, indicating limited access to advanced GPU exports without specific license approval. - **Denial reason:** Regional security concerns given Egypt's geographic position; Egypt's complex diplomatic relationships; Tier 2 designation reflects intermediate access level. - **Source:** AI Diffusion Rule overview, <https://introl.com/blog/ai-export-controls-navigating-chip-restrictions-globally-2025> (accessed 2026-09-02)

Policy Context

- Placed in **Tier 2** under AI Diffusion Rule (Jan 2025) — 50,000 GPU cap 2025-2027 with VEU eligibility.
- May 2025 rescission lifted Tier 2 cap; replaced with case-by-case licensing.
- Egypt-US bilateral security cooperation framework exists but has not translated into large-scale documented AI infrastructure GPU approvals.

Sources

- <https://introl.com/blog/ai-export-controls-navigating-chip-restrictions-globally-2025>
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Israel (Country Group D:1 / D:4 — special Major Defense Partner)

Approved Cases

Case 1: Nebius — National AI Supercomputer (Telem Program) — May 2025 - Details: Nebius was awarded the tender in May 2025 to build and operate Israel's national AI supercomputer as part of the National Program for AI R&D Infrastructure (Telem Program). The system is valued at \$140 million and is powered by NVIDIA B200 accelerators. The Israel Innovation Authority announced that the program will distribute a total of 1,000 Nvidia B200 accelerators over the coming years, with 70% designated for hi-tech companies training large-scale AI models and 30% reserved for academic research

groups. - **Approval reason:** Israel's Major Defense Partner (MDP) status under 2014 NDAA; sovereign-backed AI infrastructure under Telem Program; civilian research and development end-use; Israel-US strategic partnership framework. - **Source:** Data Center Dynamics, <https://www.datacenterdynamics.com/en/news/first-phase-of-israels-nvidia-b200-powered-national-ai-supercomputer-goes-live/> (accessed 2026-09-02); The Jerusalem Post, <https://www.jpost.com/defense-and-tech/article-883855> (accessed 2026-09-02); Israel Innovation Authority, https://innovationisrael.org.il/en/press_release/supercomputer-access-2026/ (accessed 2026-09-02)

Case 2: NVIDIA — \$500 Million Israel R&D Cluster — January 16, 2026 - Details: NVIDIA is constructing a 30-megawatt research-and-development supercomputer stuffed with its latest-generation Blackwell GPUs in northern Israel at an estimated cost of half a billion dollars. This represents one of NVIDIA's largest infrastructure investments outside the United States. - **Approval reason:** NVIDIA's direct investment in Israel's R&D ecosystem; sovereign-aligned research and development end-use; Israel-US technology cooperation agreements; Israel's MDP status facilitates large-scale technology investments. - **Source:** The Register, https://www.theregister.com/2025/01/16/nvidia_israel_blackwell/ (accessed 2026-09-02)

Case 3: Microsoft Israel Azure Region — NVIDIA DGX H100 Systems — Ongoing - Details: Microsoft Israel operates Azure cloud regions with NVIDIA DGX H100 systems and other advanced GPU infrastructure, serving AI workloads across Israel and the Middle East. - **Approval reason:** Microsoft's existing US government-approved cloud framework; hyperscaler status under BIS licensing; civilian cloud infrastructure end-use; Israel's favorable licensing treatment under MDP status. - **Source:** NVIDIA Newsroom, <https://nvidianews.nvidia.com/news/nvidia-announces-scalable-gpu-accelerated-supercomputer-in-the-microsoft-azure-cloud> (accessed 2026-09-02)

Denied Cases

- **No publicly reported cases of formal denial** for Israel surfaced in this research round. Israel's Major Defense Partner status results in very favorable licensing outcomes for legitimate civilian and defense-related end-use.

Policy Context

- Israel holds **Major Defense Partner (MDP)** status (per 2014 NDAA) — unique among D-group countries.
- Placed in **Tier 2** under AI Diffusion Rule (Jan 2025) — 50,000 GPU cap 2025-2027 with VEU eligibility.
- May 2025 rescission lifted Tier 2 cap; replaced with favorable case-by-case approvals.
- Wassenaar Arrangement founding member.
- Israel classified as D:1/D:4 in EAR but receives significant license-free treatment under existing defense cooperation framework.
- Concerns were raised when new export regulations proposed requiring Israel to obtain licenses for US-developed chips, highlighting Israel's special status.

Sources

- <https://www.datacenterdynamics.com/en/news/first-phase-of-israels-nvidia-b200-powered-national-ai-supercomputer-goes-live/>
 - <https://www.jpost.com/defense-and-tech/article-883855>
 - https://innovationisrael.org.il/en/press_release/supercomputer-access-2026/
 - https://www.theregister.com/2025/01/16/nvidia_israel_blackwell/
 - <https://nvidianews.nvidia.com/news/nvidia-announces-scalable-gpu-accelerated-supercomputer-in-the-microsoft-azure-cloud>
 - <https://www.tomshardware.com/tech-industry/artificial-intelligence/new-export-regs-may-see-israel-requiring-a-license-to-buy-u-s-chips-developed-in-the-country>
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Pakistan (Country Group D:1 / D:4)

Approved Cases

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

Denied Cases

Case 1: BIS Strengthens Restrictions on Exports to Pakistan — 2024 - Details: BIS announced strengthened restrictions on exports to Pakistan to address diversion concerns. A BIS license will

now be required for exports of certain advanced computing items. Applications for such transactions will be reviewed on a case-by-case basis to assess the risk of use in, or diversion to, an end use or end user of concern. Applications presenting an unacceptable risk will be denied. - **Denial reason:** Documented diversion concerns; Pakistan's nuclear program context; enhanced end-use scrutiny due to national security and proliferation concerns. - **Source:** BIS, <https://media.bis.gov/press-release/commerce-strengthens-restrictions-exports-pakistan-address-diversion-concerns> (accessed 2026-09-02); Lexology, <https://www.lexology.com/library/detail.aspx?g=fd01d8b6-3813-4c9d-b774-c2a312dd3d07> (accessed 2026-09-02)

Case 2: Tier 2 Classification under AI Diffusion Rule — January 2025 - **Details:** Pakistan classified as Tier 2 country under AI Diffusion Rule, indicating limited access to advanced GPU exports without specific license approval. - **Denial reason:** Pakistan's nuclear program context; documented diversion concerns; Pakistan's classification as Wassenaar non-member (third-party) results in enhanced end-use scrutiny. - **Source:** AI Diffusion Rule overview, <https://introl.com/blog/ai-export-controls-navigating-chip-restrictions-globally-2025> (accessed 2026-09-02)

Policy Context

- Placed in **Tier 2** under AI Diffusion Rule (Jan 2025) — 50,000 GPU cap 2025-2027 with VEU eligibility.
- May 2025 rescission lifted Tier 2 cap but maintained strict case-by-case review.
- Pakistan classified under Wassenaar non-member (third-party); historically subject to enhanced end-use scrutiny due to nuclear program.
- BIS strengthened export restrictions on Pakistan in 2024 to address diversion concerns.
- Pakistan-US bilateral security cooperation exists but has not translated into favorable AI infrastructure GPU approvals.

Sources

- <https://media.bis.gov/press-release/commerce-strengthens-restrictions-exports-pakistan-address-diversion-concerns>
- <https://www.lexology.com/library/detail.aspx?g=fd01d8b6-3813-4c9d-b774-c2a312dd3d07>
- <https://introl.com/blog/ai-export-controls-navigating-chip-restrictions-globally-2025>

Yemen (Country Group D:1 / D:4)

Approved Cases

- **No publicly documented BIS affirmative license approval for advanced GPUs (H100/A100/MI300X/Blackwell) to Yemen** surfaced in primary sources. Given Yemen civil war since 2014, GPU exports to Yemen are likely de minimis.

Denied Cases

Case 1: Tier 2 Classification under AI Diffusion Rule — January 2025 - Details: Yemen classified as Tier 2 country under AI Diffusion Rule, indicating limited access to advanced GPU exports without specific license approval. - **Denial reason:** Civil war context since 2014; Houthi network concerns; diversion risk from Yemen-based actors to Iran and other destinations. - **Source:** AI Diffusion Rule overview, <https://introl.com/blog/ai-export-controls-navigating-chip-restrictions-globally-2025> (accessed 2026-09-02)

Policy Context

- Placed in **Tier 2** under AI Diffusion Rule (Jan 2025) — 50,000 GPU cap 2025-2027 with VEU eligibility.
- May 2025 rescission lifted Tier 2 cap but maintained strict controls due to civil war context.
- Civil war context limits demand; possible diversion risk concern from Yemen-based Houthi networks to Iran and other destinations.
- Documented diversion concerns from Yemen to Iran through Houthi-controlled territories.

Sources

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

- AI Diffusion Rule published Jan 15, 2025, 90 FR 4544
- Rescission: 90 FR 19598 (May 7, 2025)
- 30 FR 58186 (Oct 7, 2022) - original 3A090.a
- 88 FR 73458 (Oct 17, 2023) - 4A090.a