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# Mike Huneke Authors Article in Dow Jones Risk Journal

Articles & Press

**Aug. 18, 2025 —** Mike Huneke co-authored an article in Dow Jones Risk Journal on the shift in U.S. export controls enforcement policy following the AI Action Plan, which the White House announced at the end of July.

In the article, Huneke and co-author Brent Carlson of Berkeley Research Group discuss how the AI Action Plan follows trends in U.S. export controls agency guidance and enforcement actions in focusing on end-use and end-user "catchall" provisions and risk-based liability.

"There are two key aspects to this policy recommendation. First, it focuses on the ultimate end-use of advanced, U.S.-origin technology," they write. "Second, this policy recommendation focuses on expanding and increasing controls where there is a high risk of diversion."

The article goes on to outline how the White House's Office of Science & Technology Policy plays an important role in coordinating interagency efforts across the executive branch both in terms of promoting AI technology and in terms of providing input into the calibration of U.S. export controls.

"Companies participating in these full-stack AI export packages will need to appreciate the overall trend of increased enforcement focus on end-use and end-user catchall provisions," they write. "Many of the catch-alls, as noted above, don't turn on specific ECCNs [Export Control Classification Numbers] – so consortium members whose items would not, for their own sake, be controlled could still face risk under the catchall provisions."

Huneke and Carlson also highlight how companies preparing to take part in the full-stack AI export package or to otherwise export AI compute can recalibrate assessments of U.S. export controls enforcement risks, including by designing repeatable, well-documented frameworks.

"Although the innovation and infrastructure pillars of the plan are critically important, it will be equally important for export controls compliance teams at U.S. exporters and those acting for consortia selling full-stack, American AI export packages to design, implement, document, and be able to defend how their due diligence will anticipate and protect against potential violations of the catchall provisions and risk-based enforcement," they conclude.

Read the article.

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**Michael H. Huneke**

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