

# Two Weeks In: Key Trump Administration Developments in Tech Policy

Client Alert | February 4, 2025

*Reviewing key executive orders and administrative actions.* In his first two weeks in office, President Trump unleashed a series of executive orders (EOs) and other administrative actions signalling significant shifts in federal tech policy. Some of these changes will have immediate implications for the tech sector and are already shaping client engagement strategies with federal agencies and departments. Key changes include:

- **Artificial Intelligence:** Revocation of President Biden's signature AI EO, additional support for AI infrastructure, and a new directive prioritizing U.S. acceleration in AI with fewer regulatory constraints.
- **Content Moderation & Social Media:** Prohibiting the federal government from interfering with social media platforms' content moderation decisions, while launching a federal investigation into the prior administration's efforts to pressure online platforms to address misinformation online.
- **Crypto & Digital Assets:** A new EO emphasizing innovation and directing a review of current crypto regulations.
- **Cybersecurity:** Reinforced efforts to shore up government computer systems and dismissal of members of a key cybersecurity board.
- **Deregulation Policies: Tech Impact:** A moratorium and rollback of new and pending federal rules, including those affecting tech policy, a new EO designed to implement friction into rulemaking, including by reverting to pre-2023 methods for cost-benefit analysis, and a new EO directing an evaluation of regulations for rescission and a re-evaluation of the enforcement actions that are based on the regulations identified.
- **Federal Trade Commission:** A promise of increased scrutiny of the agency after years of criticism, and a potential end to several Biden-era investigations.
- **Technology Investment:** The launch of the \$500 billion Stargate Project to expand U.S. AI infrastructure and computing power and the rechartering of the President's Council of Advisors on Science and Technology with a focus on emerging technologies.

Below we review the EOs and actions impacting tech policy in the new Administration (as well as a few late Biden Administration actions). **Artificial Intelligence** President Trump's executive actions confirm his campaign promises to chart a new deregulatory approach to federal AI policy, pivoting from the workforce displacement, AI transparency, privacy, and bias concerns that were a hallmark of President Biden's AI policy. The President is intent on shifting the focus of federal AI policy to achieve global "dominance" in AI through a policy of reducing government friction to innovation and development of advanced AI. Below we review some of the recent pronouncements on AI and what they signal.

Executive Order Revoked: Safe, Secure, and Trustworthy Development and Use of Artificial Intelligence On his first day in office, President Trump revoked [EO 14110](#) – the Biden Administration's most extensive AI-related EO (Biden AI EO), which aimed to promote and formulate principles for the safe and ethical use of AI. Some of the stated goals of the rescinded Biden AI EO were to (i) develop standardized metrics to assess AI

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safety, (ii) facilitate watermarking and clear labeling of AI-generated content, (iii) promote responsible innovation and invest in AI-related training, (iv) ensure that American workers were not negatively affected by AI developments, (v) protect privacy and civil rights including by mitigating the use of AI to discriminate based on personal information, and (vi) manage the risks arising from the government's use of AI. New Executive Order: Removing Barriers to American Leadership in Artificial Intelligence After revoking the Biden AI EO, President Trump issued a shorter one of his own, [EO 14179](#), "Removing Barriers to American Leadership in Artificial Intelligence." This new AI EO sets out the organizing principles for AI policy, aiming to "solidify [America's] position as the global leader in AI." Key provisions and actions include:

- Stating that the development of AI systems must be "free from ideological bias or engineered social agendas."
- Directing presidential advisors to identify and "suspend, revise or rescind" actions taken pursuant to the Biden AI EO to the extent inconsistent with the stated goals of the Trump Administration's AI policy.
- Ordering the Office of Management and Budget ("OMB") to revise OMB Memoranda [M-24-10](#) and [M-24-18](#) (which created a set of requirements for federal agencies procuring AI) for consistency with the new AI policy.
- Announcing the "policy of the United States to sustain and enhance America's global AI dominance in order to promote human flourishing, economic competitiveness, and national security."
- Naming several officials (most importantly, the Assistant to the President for Science and Technology, the Special Advisor for AI and Crypto, and the Assistant to the President for National Security Affairs) responsible for developing an "action plan" to achieve the Administration's AI goals.

These provisions, though vague, are intended to promote AI deregulation and reject Biden's policies on AI equity, workforce protection, and "safe and responsible" innovation – including the OMB memorandum that required government agencies to consider equity, anti-discrimination, and environmental concerns when implementing AI. While many of President Biden's policies are being phased out, the new EO leaves some leeway to keep others in place. Notably, the Trump Administration has not yet announced its position on the Commerce Department's recently announced export control rules for AI chips and frontier model weights (titled the "Framework for Artificial Intelligence Diffusion" (further discussed in our recent [client alert](#))), leaving its fate uncertain. No Repeal of President Biden's Executive Order: Advancing United States Leadership in Artificial Intelligence Infrastructure As of today, President Trump has not rescinded [EO 14141](#), "Advancing United States Leadership in Artificial Intelligence Infrastructure," which President Biden issued during his last week in office. EO 14141 directs certain federal agencies to implement procedures by which non-federal entities, including private-sector companies, can apply to lease certain federal sites for the purpose of constructing and operating "AI infrastructure." The EO is largely consistent with President Trump's AI priorities – in fact, as further outlined below, President Trump has announced even more aggressive investment to improve AI infrastructure. For more information about EO 14141, see our recent [client alert](#). **Content Moderation & Social Media** President Trump's [EO 14149](#), "Restoring Freedom of Speech and Ending Federal Censorship," prohibits federal action or the "use [of] any Federal resources" in a manner that "would unconstitutionally abridge the free speech of any American citizen" and, in the same stroke, directs the Attorney General, together with agencies, to investigate and report on "activities of the Federal Government" during the Biden Administration that "exert[ed] substantial coercive pressure on third parties, such as social media companies, to moderate, deplatform, or otherwise suppress speech that the Federal Government did not approve." The EO primarily applies to federal agencies and their respective employees and agents, although the prohibition on using "taxpayer resources" to encroach on First Amendment protections could potentially extend to state, public, or private actors receiving federal funding. Although the EO harshly criticizes the prior administration's efforts to

combat online misinformation as motivated by “advanc[ing] the Government’s preferred narrative about significant matters of public debate,” early signals from the Trump Administration suggest continued pressure on content policies of online media platforms that are in tension with the EO. In selecting Andrew Ferguson as FTC Chair, President Trump praised his “proven record of standing up to Big Tech censorship,” and [Chair Ferguson has previously](#) “urge[d] the Commission to investigate online platforms for unfair acts or practices relating to their opaque, unpredictable processes for banning users and censoring content,” noting that “President Trump himself asked the Commission in 2020 to investigate such practices.” (FCC Commissioner Carr has similarly [criticized](#) alleged tech censorship.) During both the first Trump Administration and the Biden Administration, online platforms and social media companies have faced a stream of lawsuits, regulatory action, Congressional inquiries, and public pressure challenging the types of user content that are – or are not – available to be viewed among the billions of daily posts on their services. Gibson Dunn successfully has defended platforms’ immunity from government action targeting user content posted on their services, including under the First Amendment, see, e.g., [Meta Platforms, Inc. v. District of Columbia](#), and the Supreme Court has [indicated](#) that efforts to divulge and constrain platforms’ approaches to content moderation likely intrude on protected speech. These and numerous other appellate decisions upholding platforms’ content-moderation policies on First Amendment grounds suggest a fundamental tension in the EO’s espoused commitment to freedom of speech and the underlying policy objectives of the Trump Administration. Similarly, the EO’s mandate to investigate and “correct past misconduct by the Federal Government related to censorship of protected speech” could raise First Amendment concerns to the extent it seeks to invade or penalize the editorial decisions and content policies implemented by online platforms in response to a rapidly evolving policy and technical landscape or to leverage government resources to target viewpoints contrary to those supported by the current administration.

**Cryptocurrency & Digital Assets** President Trump’s [EO 14178](#), “Strengthening American Leadership in Digital Financial Technology,” according to the accompanying [fact sheet](#), signals the Trump Administration’s interest in promoting innovation in “digital financial technology” and establishing America’s leadership in the space, and revokes President Biden’s 2022 EO outlining priorities for crypto regulation. President Trump’s EO establishes the President’s Working Group on Digital Asset Markets, tasked with evaluating current crypto regulations and issuing recommendations for modifying or rescinding them, with deadlines over the next few months. President Trump has directed the group – chaired by David Sacks, the White House AI and Crypto Czar, and including the heads of the SEC and the Commodity Futures Trading Commission – to develop a framework for regulating digital assets and stablecoins, taking into account consumer protection, risk management, and market structure, and to evaluate the idea of creating a digital asset stockpile, which would be derived from “cryptocurrencies lawfully seized by the Federal Government through its law enforcement efforts.” On the campaign trail, President Trump [floated the idea](#) of a Bitcoin stockpile with the aim of making the U.S. the “crypto capital of the planet” and reducing the national debt. The recently issued EO does not specifically refer to a Bitcoin stockpile, but rather directs the working group to analyze the idea of a stockpile of digital assets, generally. By contrast, the revoked 2022 [EO 14067](#) from President Biden outlined six key priorities for crypto regulation: protecting U.S. interests, maintaining global financial stability, preventing illicit uses, promoting responsible innovation, enhancing financial inclusion, and ensuring U.S. leadership in the digital finance space. The Biden Administration’s regulatory framework faced criticism from cryptocurrency industry leaders, who argued that it created barriers for crypto firms and startups in accessing traditional banking services. President Trump’s EO appears oriented towards reversing these trends and making it easier for crypto companies to operate and access banking services. Additionally, the EO rescinds the Biden Treasury Department’s [digital asset framework](#) issued on July 7, 2022, which aimed to leverage central bank digital currencies to reinforce U.S. leadership in the global financial system while preventing illegal uses of digital currencies.

**Cybersecurity** Biden’s [Cybersecurity EOs Remain Intact](#) In his last week in office, President Biden issued [EO 14144](#), “Strengthening and Promoting Innovation in the Nation’s Cybersecurity,” building on his 2021 [EO 14028](#) (“Improving the Nation’s Cybersecurity”). To date, President Trump has not rescinded either EO 14114 or EO 14028. EO 14114 directs federal

government agencies to improve cybersecurity and defend digital infrastructure, promoting in particular secure software development and cloud security. The EO seeks to address persistent cyber threats from “adversarial countries and criminals” – in particular China – which, the EO states, disrupt the delivery of critical services and threaten Americans’ security and privacy. Given the bipartisan alignment on cybersecurity threats, especially from China, and National Security Advisor Mike Waltz’s [statement](#) that the Trump Administration is “hand in glove” with the Biden Administration on U.S. adversaries and national security issues, these EOs are likely to survive. Key provisions include:

- Agencies, including the OMB and NIST, must issue guidance on cybersecurity standards, and the Federal Acquisition Regulation Council must amend its regulations to require federal contractors to follow the new minimum cybersecurity standards.
- Agencies must adopt procedures to ensure that the software they use is secure and can be accessed only by appropriate parties.
- Agencies must implement “strong identity authentication and encryption” to secure their internal communications.
- To combat identity theft and benefits fraud, agencies are strongly encouraged to accept digital identity verification when determining eligibility for public benefits programs.
- As part of a new comprehensive framework for integrating AI into federal cybersecurity efforts, DOE must launch a pilot program to evaluate AI-enhanced cyber defense capabilities. Similarly, the DOD must also establish an advanced AI cyber defense program within 270 days.
- The types of cyber-related activities that will trigger sanctions have been expanded.

Key Appointments and Removals: Cybersecurity Even while there are signals that the Trump Administration will continue to pursue similar cybersecurity policy objectives, there are important indicators of change. On January 20, 2025, Acting Secretary of Homeland Security Benjamin Huffman directed the termination of all current memberships on advisory committees within DHS, effective immediately. This had the effect of removing the private-sector representatives of the Cyber Safety Review Board (CSRB), a component of the DHS, established in May 2021 by President Biden’s [EO 14028](#) (“Improving the Nation’s Cybersecurity”). The CSRB was charged with “review[ing] and assess[ing]” significant cyber incidents, and was composed of representatives from within the private sector and the U.S. Government. Since its establishment, the [CSRB](#) has published reports following reviews of three cyber incidents ([Log4j](#), [Lapsus\\$](#) and related threat actor groups, and the [Summer 2023 Microsoft Exchange Intrusion](#)). The CSRB [publicly confirmed](#) in October 2024 that it would initiate a review of the “Salt Typhoon” incident, which involved attacks from a China state-backed threat actor, and held its first meeting to begin the investigation on December 6, 2024. The future membership of the CSRB is unknown, and it is uncertain whether the investigation into the “Salt Typhoon” incident will continue. New Federal Acquisition Regulation: Controlled Unclassified Information Just days before President Trump took office, the Department of Defense, General Services Administration, and National Aeronautics and Space Administration proposed new regulations related to Controlled Unclassified Information (CUI). The [proposal](#) would amend the Federal Acquisition Regulation that implements [EO 13556](#), an Obama-era directive instructing agencies to create unified standards to define and protect CUI across all aspects of government. The proposed rule creates a standardized set of requirements to be incorporated into all government contracts that involve the handling of CUI. These requirements are comprehensive and broad in scope – covering (among other things) how CUI is identified, which cybersecurity standards apply to CUI, and how contractors must train employees and report CUI incidents. The proposed rule carries both benefits and risks for government contractors. On the one hand, it aims to standardize the many existing cybersecurity requirements that vary across agencies,

providing much-needed uniformity and clarity. However, the proposed rule also tightens many requirements, potentially creating new compliance risks for government contractors. Since the announcement of the [DOJ's Civil Cyber Fraud Initiative](#) in October 2021, combatting cybersecurity-related fraud by government contractors under the False Claims Act has been a top priority for the DOJ, and the proposed rule could give rise to further enforcement actions if enacted. The comment period expires on March 17, 2025. Although the proposed rule is subject to President Trump's regulatory freeze memorandum (discussed below), given the ongoing importance of cybersecurity, it seems likely that the proposed rule will move forward in some form. **Deregulation Policies: Tech Impact Regulatory Freeze** As is customary, President Trump (in addition to [rescinding](#) more than 70 EOs issued by the Biden Administration) issued a freeze of numerous Biden Administration policy and regulatory directives. His [memorandum](#) – which is similar to the [regulatory freeze](#) issued by the OMB on behalf of the President at the beginning of the Biden Administration – (1) places a moratorium on any new “rules” or “regulatory actions,” pending review by President Trump's appointees; (2) directs agencies to immediately withdraw any rules sent out for publication but not yet published in the Federal Register; and (3) directs agencies to consider postponing, by 60 days, the effective dates of any rules that have been published but not taken effect. The moratorium may affect several final rules or rule proposals during Biden's Administration including executive actions on cybersecurity, data privacy, and AI, including:

- The DOJ's recent [final rule](#) on bulk U.S. sensitive personal data, which prohibits or restricts U.S. persons from engaging in covered data transactions involving certain categories of U.S. residents and/or government bulk sensitive personal data with covered persons and countries of concern (China, Cuba, Iran, North Korea, Russia, and Venezuela). Although the rule has an exception for certain corporate group transactions, the Biden Administration took a narrow view of the exception, and U.S. companies will need to proceed cautiously if the rule comes into effect as drafted.
- The U.S. Commerce Department's Bureau of Industry and Security's connected-vehicles [final rule](#), which bans certain imports and sales of vehicles from China (including Hong Kong) and Russia, as well as key hardware and software components, based on “undue or unacceptable risks” to U.S. national security.
- The Information and Communications Technology and Services Supply Chain (ICTS) [final rule](#), which permits the Secretary of Commerce to prohibit ICTS transactions or impose mitigation measures for ICTS transactions involving “persons owned by, controlled by, or subject to the jurisdiction or direction of foreign adversaries” posing certain “undue or unacceptable risks.”
- The infrastructure-as-a-service (IaaS) [notice of proposed rulemaking](#), which imposes restrictions on the activities of U.S. IaaS providers, including the training of large AI models, and relied significantly on the Biden AI EO.

For more information on the impact of the new administration's regulatory freeze memorandum on regulations relevant to privacy, data, cybersecurity, technology, and artificial intelligence, see our recent [client alert](#). **New Executive Order: Unleashing Prosperity Through Deregulation** On January 31, President Trump continued his deregulatory efforts, issuing an [EO](#) titled “Unleashing Prosperity Through Deregulation,” which aims to “promote prudent financial management and alleviate unnecessary regulatory burdens.” The EO directs:

- Departments and agencies to identify 10 regulations for repeal for every new regulation issued,
- Department and agency heads to ensure that the total cost of all new regulations for fiscal year 2025, including repealed regulations, is “significantly less than zero,”
- OMB to issue guidance to agencies regarding the implementation of the above,



including processes for standardizing the measurement and estimation of regulatory costs, and

- OMB to revoke the Biden Administration's [2023 version](#) of OMB Circular No. A-4 and reinstate the [prior version](#), which was issued in 2003. This action will return the threshold for conducting rigorous analysis to account for uncertainties about the benefits and costs of “significant” regulations from \$200 million to \$100 million, increasing scrutiny on more rules. The action also returns the discount rates for conducting cost-benefit analysis from a single 2% rate to a 7% rate for the cost of capital and a 3% rate for the social rate of time preference, meaning that rules with future, speculative benefits will be less likely to be considered cost-justified.

The EO demonstrates the Trump Administration’s commitment to across-the-board deregulation as a tool to reduce compliance costs, stimulate economic growth and innovation, and increase global competitiveness. It will have a significant impact on the rulemaking process during President Trump’s second term and increase the likelihood that many Biden Administration rules will be rescinded. [New Executive Order: Ensuring Lawful Governance and Implementing the President’s “Department of Government Efficiency” Deregulatory Initiative](#) On February 19, President Trump took the next step in his deregulatory efforts, issuing an EO titled “Ensuring Lawful Governance and Implementing the President’s ‘Department of Government Efficiency’ Deregulatory Initiative.” The EO has two main stated objectives: (1) to focus limited enforcement resources on “regulations squarely authorized by constitutional Federal statutes,” and (2) “to commence the deconstruction of the overbearing and burdensome administrative state.” The EO directs:

- Evaluation of Regulations for Rescission
  - Agency heads to coordinate with their DOGE Team Leads and Director of the Office of Management and Budget (OMB) to develop a process to review all regulations within their jurisdiction.
  - Agency heads to identify—prioritizing those rules that qualify as “significant regulatory actions” under EO 12,866—(i) unconstitutional regulations; (ii) regulations based on unlawful delegations of legislative power; (iii) regulations based on anything other than the best reading of the relevant statute, in light of the Supreme Court’s decision in *Loper Bright Enterprises v. Raimondo*, 603 U.S. 369 (2024); (iv) socially, politically, or economically significant regulations not authorized by clear statutory authority; (v) regulations that impose significant costs on private parties not outweighed by public benefits; (vi) regulations that harm the national interest by significantly and unjustifiably impeding technological innovation, infrastructure development, disaster response, inflation reduction, research and development, economic development, energy production, land use, and foreign policy objectives; and (vii) regulations that impose undue burdens on small business and impede private enterprise and entrepreneurship.
  - Agency heads to provide a list of all such regulations within 60 days (i.e., before April 20, 2025) to the Administrator of the Office of Information and Regulatory Affairs (OIRA) within OMB and to coordinate with the OIRA Administrator to develop a Unified Regulatory Agenda to rescind or modify the identified regulations, as appropriate.
- Re-evaluation of Enforcement Priorities
  - Agency heads to de-prioritize enforcement actions involving regulations that are not based on the best reading of a statute and that go beyond “the powers vested in the Federal Government by the Constitution.”
  - Agency heads to determine whether ongoing enforcement of any of the identified regulations does not comport with “law and Administration

policy.”

- Agency heads, in consultation with the OMB Director, to direct the termination of such enforcement proceedings, on a case-by-case basis and consistent with applicable law.

The EO provides three exemptions for: (i) any action related to a military, national security, homeland security, foreign affairs, or immigration-related function of the United States; (ii) any action related to the executive branch’s management of its employees; or (iii) anything else exempted by the Director of the Office of Management and Budget. This most recent deregulatory EO is notable for two reasons. First, it provides agencies with the most specific guidance to date about which rules to prioritize for regulatory review and potential modification or rescission. Correlatively, it provides regulated entities with more insight into which regulations may receive scrutiny under the new Trump Administration. Second, it explicitly directs agencies to evaluate ongoing *enforcement* actions based on those regulations and to terminate them if they “do not comply with the Constitution, laws, or Administration policy.” For more detailed analysis of this EO, please see our client alert [here](#). **Federal Trade Commission New Executive Order: Ending the Weaponization of Federal Government** President Trump’s [EO 14147](#), “Ending the Weaponization of the Federal Government,” purports to address the Biden Administration’s “systematic campaign against its perceived political opponents.” The EO instructs the Attorney General to review all agencies with enforcement authority to identify any actions taken as part of this alleged campaign and prepare a report recommending remedial actions. The Director of National Intelligence must do the same for the intelligence community. Notably, the order singles out three agencies for scrutiny: the FTC, the DOJ, and the Securities and Exchange Commission (SEC). This notable FTC callout comes on the heels of criticism of Chair Lina Khan’s leadership of the agency under the Biden Administration. In [March 2023](#) and [October 2024](#), Republican House staff issued two reports attacking Chair Khan’s purported mismanagement of the agency to pursue political and ideological aims, undermine agency norms, and centralize power. Republican Commissioners had also been critical of former Chair Khan’s leadership. On February 14, 2023, Commissioner Christine Wilson [publicly resigned](#) in protest over what she alleged was Chair Khan’s “disregard for the rule of law and due process” that had made “it impossible to continue serving.” Similarly, in the waning days of the Biden Administration, Commissioner Andrew Ferguson (whom President Trump recently appointed as Chair) published multiple opinions criticizing the agency’s last minute actions as political, including [one in which he described](#) the FTC’s filing of a suit to be “one final insult to the Commission, its staff, and the rule of law” that was about “partisan politics, pure and simple.” While the full implications of the EO are not yet clear, it provides support for the incoming Republican Commissioners to reevaluate ongoing or planned investigations, including several tech industry investigations launched under Chair Khan’s watch. At the very least, the EO signals that the FTC may move away from several of Chair Khan’s more ambitious enforcement initiatives and administrative changes. **New Executive Order: Ensuring Lawful Governance and Implementing the President’s “Department of Government Efficiency” Deregulatory Initiative** On February 19, President Trump took the next step in his deregulatory efforts, issuing an EO titled “Ensuring Lawful Governance and Implementing the President’s ‘Department of Government Efficiency’ Deregulatory Initiative.” The EO has two main stated objectives: (1) to focus limited enforcement resources on “regulations squarely authorized by constitutional Federal statutes,” and (2) “to commence the deconstruction of the overbearing and burdensome administrative state.” The EO directs:

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- The project is structured as a phased investment, with an initial \$100 billion deployment and a promise to hit \$500 billion within five years. Among the projects mentioned at the press conference, the greatest focus was on an ongoing data-center development.
- The project aims to secure U.S. technological dominance in AI processing capacity, support domestic and allied security interests, and mitigate reliance on



foreign AI infrastructure.

- From an economic standpoint, Stargate is expected to create over 100,000 jobs in AI infrastructure, cloud computing, and clean energy development.
- Initial Stargate equity funders include OpenAI, which will lead AI model development and operations, SoftBank (which will oversee financing), and Oracle and MGX (which, alongside technology partners such as Microsoft, NVIDIA, and Arm, will provide the cloud, semiconductor, and compute capabilities necessary to scale operations).

**New Executive Order: President Trump Revamps Science and Technology Advisory Council. With a Focus on Emerging Technologies and Promoting American Technological Leadership** On January 23, 2025, President Trump issued [EO 14177](#), rechartering the President's Council of Advisors on Science and Technology (PCAST) for a minimum of two years to advise on policies related to science, technology, and innovation, with a specific emphasis on emerging technologies including AI, quantum computing, and advanced biotechnology. The [accompanying fact sheet](#) explains that PCAST will "champion bold investments in innovation, the elimination of bureaucratic barriers, and actions to help the United States remain the world's premier hub for scientific and technological breakthroughs." The fact sheet also announces that the President's science and technology policies will be "refocused" on "results-driven excellence and merit-based achievement" to combat the "threat from ideological agendas," which, according to the EO, have "eroded public trust, undermined the integrity of research, stifled innovation, and weakened America's competitive edge." The EO additionally states that achieving and maintaining "unquestioned and unchallenged global technological dominance" is a "national security imperative," and that PCAST's advice will inform policies concerning national and homeland security, the American economy, and the American worker. President Trump's restructured PCAST will include up to 24 members and will be co-chaired by the White House A.I. and Crypto Czar (technology investor David Sacks) and the Assistant to the President for Science and Technology (President Trump's former Chief Technology Officer Michael Kratsios), who may in turn designate up to two PCAST members as vice chairs. PCAST is tasked with meeting regularly to respond to requests for information and advice from the President or the co-chairs; soliciting information from a broad range of stakeholders; and serving as an advisory body related to high-performance computing and nanotechnology, and to the National Science and Technology Council. PCAST is also authorized to create standing subcommittees and ad hoc groups. In his first term, President Trump waited nearly two years to recharter PCAST and appointed only seven members, many of whom had backgrounds in business rather than technology. The timing and structure of President Trump's EO suggests that PCAST will play a more significant role during his second term, and that it will be fully staffed to support his administration's efforts to cultivate emerging technologies and the artificial intelligence and cryptocurrency industries. **Looking Ahead** The Trump Administration has set a deregulatory, pro-innovation tone for domestic tech policy, with reversals from Biden-era policies on the approach to AI, content moderation, digital assets and regulation of the tech sector. There is more continuity on the international front, with the Trump Administration continuing the Biden Administration's focus on cybersecurity and export controls of sensitive technology, particularly as to China, albeit while dismantling key public-private partnerships that focused on these areas. As the Trump Administration fills in the details of its new tech policy agenda, Gibson Dunn lawyers will be watching closely and are ready to advise businesses on breaking developments. *Please click on the link below to view our previous alert and charts covering some of the most relevant recent rulemaking in the areas of data privacy, cybersecurity, and AI:* [Read More](#)

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