UNITED STATES INTERNATIONAL TRADE COMMISSION
WASHINGTON, DC

IN THE MATTER OF	
CERTAIN VERTICAL POWER DELIVERY SYSTEMS, COMPONENTS THEREOF, AND COMPUTING SYSTEMS CONTAINING THE SAME	**Investigation No. 337-TA-_____** **Docket No. 3936**

PROPOSED RESPONDENTS LUXSHARE PRECISION INDUSTRY CO., LTD. AND DONGGUAN LUXSHARE TECHNOLOGY CO., LTD. A/K/A LUXSHARE-TECH'S PUBLIC INTEREST STATEMENT

Proposed Respondents Luxshare Precision Industry Co., Ltd. and Dongguan Luxshare Technology Co., Ltd. a/k/a Luxshare-Tech ("Luxshare") respectfully submit this response to the U.S. International Trade Commission's solicitation of comments relating to the public interest in the above-captioned matter. *See* 91 FED. REG. 58175-76 (Sept. 14, 2026). Complainant Vicor Corporation ("Vicor") seeks to exclude Vertical Power Delivery ("VPD") Power Modules and Circuit Board Assembly technology vital to developing modern data centers and advancing artificial intelligence ("AI") in the United States—an area the current Administration has repeatedly identified as a national priority.[1]

The relief Vicor seeks would materially disrupt U.S. AI supply chains and stifle innovation in one of the most strategically important technology sectors in the American economy. Luxshare therefore respectfully requests that the Commission not institute an investigation or, in the alternative, delegate the taking of evidence on the statutory public interest factors to the ALJ, as it has done in recent investigations implicating similar technology.[2] And because the public interest is "peculiar to section 337," Luxshare also requests that a Commission Investigative Staff Attorney

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[1] *See* Exec. Order No. 14363, *Launching the Gensis Mission*, 90 FED. REG. 55035 (Nov. 28, 2025), https://www.whitehouse.gov/presidential-actions/2025/11/launching-the-genesis-mission/?query-11-page=3&utm_campaign=weekly-ai-news-did-you-miss-it&utm_medium=referral&utm_source=www.ainauten.net; Exec Order No. 14365, *Ensuring a National Policy Framework for Artificial Intelligence*, 90 FED. REG. 58499 (Dec. 16, 2025), https://www.federalregister.gov/documents/2025/12/16/2025-23092/ensuring-a-national-policy-framework-for-artificial-intelligence?trk=article-ssr-frontend-pulse_little-text-block#1; Exec. Order No. 14179, *Removing Barriers to American Leadership in Artificial Intelligence*, 90 Fed. Reg. 8741 (Jan. 31, 2025), https://www.federalregister.gov/documents/2025/01/31/2025-02172/removing-barriers-to-american-leadership-in-artificial-intelligence; Exec. Order No. 14409, *Promoting Advanced Artificial Intelligence Innovation and Security*, 91 FED. REG. 34565 (June 2, 2026), https://www.federalregister.gov/documents/2026/06/05/2026-11415/promoting-advanced-artificial-intelligence-innovation-and-security.

[2] *See Certain DRAM Devices, Products Containing the Same, and Components Thereof (I), Inv.* No. 337-TA-1472, Comm'n Notice at 2 (Dec. 29, 2025) (EDIS Doc ID 867533); *Certain DRAM Devices, Products Containing the Same, and Components Thereof (II)*, Inv. No. 337-TA-1511, Comm'n Notice at 2 (Jul. 15, 2026) (EDIS Doc ID 888137).

("Staff") be assigned to the investigation.[3]

I. HOW THE ACCUSED PRODUCTS ARE USED IN THE UNITED STATES

The Accused Products—VPD modules—are incorporated into server and computing systems that form critical infrastructure for modern data centers.[4] These servers are used in virtually every sector of the U.S. economy, including those implicating important health and welfare needs such as "energy efficient automobiles, basic scientific research, [and] hospital equipment."[5] *Spansion, Inc. v. Int'l Trade Comm'n*, 629 F.3d 1331, 1360 (Fed. Cir. 2010). Vicor itself characterizes the Accused Products as "fuel[ing] modern artificial intelligence implementations." *See* Vicor PI Statement at 3.

II. PUBLIC HEALTH, SAFETY, AND WELFARE CONCERNS

VPDs materially benefit the public health and welfare because they facilitate processing of the ever-increasing volume of data in this new era of high-performance computing ("HPC") and AI. Advances in medical treatment, diagnostics, and cancer research depend on these power-delivery architectures.[6] So do modern data centers, which store, process, and distribute data across

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[3] U.S. Int'l Trade Comm'n, *Supplement to the Strategic Human Capital Plan 2009–2013* at 23–24 (Jan. 18, 2011), https://www.usitc.gov/press_room/documents/human_capital_plan_supplemental_1-18-2011.pdf?utm_source=chatgpt.com .

[4] *See* Mattias Jansson, *Power Management in AI Data Centers*, PSD 22 (Feb. 20, 2025), https://www.powersystemsdesign.com/articles/power-management-in-ai-data-centers/140/22554.

[5] *The Cost of Compute: A $7 Trillion Race to Scale Data Centers*, McKinsey Quarterly (Apr. 28, 2025), https://www.mckinsey.com/industries/technology-media-and-telecommunications/our-insights/the-cost-of-compute-a-7-trillion-dollar-race-to-scale-data-centers; *Sustainability AI*, Google AI, https://ai.google/sustainability/; *4 Ways Google Research Is Using AI to Advance Scientific Discovery*, Google Blog (Jan. 7, 2026), https://blog.google/innovation-and-ai/technology/research/google-research-scientific-discovery/; *Detecting Hospital Incidents with AI—Without Compromising Patient Privacy*, Google Cloud Blog (June 24, 2025), https://cloud.google.com/blog/topics/healthcare-life-sciences/detecting-hospital-incidents-with-ai-without-compromising-patient-privacy.

[6] *See* Kanadpriya Basu et al., *Artificial Intelligence: How Is It Changing Medical Sciences and Its Future?,* INDIAN J. OF DERMATOLOGY, Sept-Oct (2020), https://pmc.ncbi.nlm.nih.gov/articles/PMC7640807/; *Detecting Hospital Incidents*, *supra* n.5.

every major sector of the U.S. economy, including financial services, healthcare, agriculture, energy, and government.[7]

Preserving U.S. leadership in AI and data center development is among the current Administration's top priorities. To be sure, Executive Order 14365 states that U.S. leadership AI "will promote United States national and economic security;"[8] Executive Order 14179 declares that "[i]t is 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;"[9] Executive Order 14363 "recognizes the need to invest in AI-enabled science to accelerate scientific advancement" and describes that need as "comparable in urgency and ambition to the Manhattan Project;"[10] and the Administration's "AI Action Plan" warns that losing the AI race is a national security concern.[11] AI, and the data centers that support it, are therefore integral to public health, safety, and welfare.

Vicor frames the public interest concern too narrow by suggesting that its requested remedies do not implicate a compelling public interest because the Accused Products are not pharmaceuticals or medical equipment. *See* Vicor PI Statement at 3-4. The statutory factor is "public health and welfare," and the Commission has recognized that "welfare" encompasses overriding national interests where exclusion would substantially harm critical sectors.[12] The

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[7] *See* The White House, *Winning the Race: America's AI Action Plan* (July 2025), https://www.whitehouse.gov/wp-content/uploads/2025/07/Americas-AI-Action-Plan.pdf; *see also* P. Smith-Goodson et al., *The Stargate Project: Trump Touts $500 Billion Bid for AI Dominance*, Forbes (Jan. 30, 2025), https://www.forbes.com/sites/moorinsights/2025/01/30/the-stargate-project-trump-touts-500-billion-bid-for-ai-dominance/.

[8] Exec. Order No. 14365, *supra* n.1 at 58499.

[9] Exec. Order No. 14179, *supra* n.1 at 8741.

[10] Exec. Order No. 14363, *supra* n.1 at 55035.

[11] *See Winning the Race*, *supra* n.7; *see also The Stargate Project*, *supra* n.7.

[12] *See Certain Automatic Crankpin Grinders*, Inv. No. 337-TA-60, USITC Pub. 1022 (1979); *Certain Inclined Field Acceleration Tubes*, Inv. No. 337-TA-67, USITC Pub. 1119 (1980).

modern AI computing ecosystem is just such a sector—increasingly treated as strategic infrastructure for economic competitiveness, cybersecurity, and national defense.[13]

Vicor's requested relief undermines these goals by removing significant market supply for VPD modules, threatening shortages in the rapid build-out of AI and cloud data centers and creating cascading disruptions across sectors vital to public health and welfare.

III. COMPETITIVE CONDITIONS/IMPACT OF REQUESTED RELIEF ON U.S. CONSUMERS

Vicor seeks exclusionary relief against major VPD suppliers that together represent a substantial portion of the supply chain for multi-cell VPD converters used in AI applications and data centers.[14] Excluding multiple qualified suppliers at once would materially reduce supply options, increase switching costs, and weaken competitive constraints in a market where hyperscale customers rely on an already narrow set of pre-qualified suppliers, increasing pricing pressure, forcing costly redesigns, and delaying deployment of foundational data-center infrastructure.

Vicor provides not support for its assertion that it has enough "manufacturing capacity to replace the Proposed Respondents' unlicensed products." Vicor PI Statement at 4. Vicor does not identify any "licensee" or OEM purportedly capable of meeting demand in a commercially reasonable timeframe. Indeed, Vicor's own public disclosures reflect long lead times, substantial backlogs, capacity constraints, and extended design and qualification cycles. For example, Vicor has reported an order backlog of approximately $176.9 M (a $21.4 M increase from December 2024) and quoted lead times of 22–28 weeks.[15] Vicor has stated that it expects to remain capacity

[13] *See* Exec. Order No. 14179, *supra* n.1.
[14] *See, e.g., From Interconnect to Power and Thermal Management: Luxshare-ICT Expands its Role in AI Data Center Infrastructure,* (Apr. 24, 2026 10:02), https://www.prnewswire.com/news-releases/from-interconnect-to-power-and-thermal-management-luxshare-ict-expands-its-role-in-ai-data-center-infrastructure-302752978.html.
[15] Vicor Corporation, Annual Report (Form 10-K), U.S. Securities and Exchange Commission, pg.

constrained for a substantial timeframe and that it is selectively prioritizing key customers and applications.[16] A supplier that is already rationing output among its customers cannot absorb the entire demand currently served by multiple excluded suppliers. In short, Vicor provided no evidence that the supply void created by its requested remedies could be filled in a manner that would avoid severe disruption to U.S. AI development.

Absent such capacity, the consequences of Vicor's requested remedial orders would be immediate and far-reaching. U.S. consumers increasingly rely on cloud and AI services supported by hyperscale data centers. Disruptions in the supply of specialized VPDs would result in data center projects in the U.S. being delayed or canceled and would force U.S. companies to seek AI compute capacity abroad or abandon projects altogether. Vicor dismisses these risks by characterizing them as "minor price increases." Vicor PI Statement at 5. That assertion is unsupported by any capacity, lead-time, or qualification evidence and understates the true risk of putting high-compute AI companies at the mercy of Vicor. The issue here is not marginal pricing effects; it is the risk of substantial disruption to the U.S. AI ecosystem at a moment when this country's global leadership in AI is both economically and strategically critical.

IV. CONCLUSION

Vicor fails to demonstrate that its requested remedies are consistent with the public interest, and it ignores the profound consequences such disruption would have on U.S. AI development, innovation, and competitiveness. The Commission should therefore decline to institute this investigation or, in the alternative, delegate the public interest inquiry to the ALJ and assign Staff to the investigation to ensure a complete record on this important issue.

7, available at https://vicorcorporation.gcs-web.com/static-files/518e6261-81b7-42a4-bb83-ebbda38b139c.

[16] *Id.* at pgs. 15-16.

Dated: September 22, 2026

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CERTIFICATE OF SERVICE

I hereby certify that on September 22, 2026, a copy of the foregoing was filed/served upon the following:

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