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Governance or Competition? Divergent Frames in AI Policy Discourse Across the US and Global South

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Abstract

How do nations construct artificial intelligence as a policy problem? This comparative study analyzes AI policy discourse across the United States and three Global South nations (South Africa, Brazil, India), revealing divergent framing patterns. Analysis of 192 US congressional hearings and 102 Global South policy documents shows that the US frames AI primarily through a **competition lens**—combining geopolitical sovereignty claims (22%) with economic opportunity narratives (21%)—while Global South nations frame AI through **governance** (42%) concerns. Sovereignty framing, prominent in US discourse, is virtually absent in Global South contexts (1%). Effect sizes for the governance (Cramér's $V = .25$) and sovereignty ($V = .32$) divergences are moderate to large by conventional standards. These patterns suggest that AI policy discourse reflects broader geopolitical positioning: the US constructs AI as a race against China requiring mobilization, while Global South nations construct AI as a regulatory challenge requiring institutional frameworks. Drawing on Ulicane et al.'s (2021) analysis of European AI policy frames, we situate these findings within emerging patterns of AI governance discourse and discuss implications for international cooperation.

Keywords: artificial intelligence, framing, comparative policy, Global South, governance, technology policy

Introduction

In January 2024, a US Senate hearing on artificial intelligence opened with a familiar refrain: "We are in a technological competition with China that will determine the future of the 21st century." That same month, Brazil's Chamber of Deputies debated AI regulation with strikingly different emphasis: "We must establish clear frameworks for algorithmic transparency and accountability before these systems are deployed at scale." These contrasting framings—competition versus governance—reflect deeper divergences in how nations construct AI as a policy problem.

Framing research has long demonstrated that problem definition is itself political, shaping which solutions appear viable and which are foreclosed (Entman, 1993; Gamson & Modigliani, 1989). When the United States frames AI as competition with China, it privileges policy responses emphasizing investment, acceleration, and regulatory forbearance. When Brazil frames AI as a governance challenge, it privileges responses emphasizing institutional frameworks, rights protections, and accountability mechanisms. These are not merely rhetorical differences; they constitute different understandings of what AI is and what it demands.

This study presents a systematic comparison of AI policy framing across the United States and Global South nations. Drawing on analysis of 192 US congressional hearings and 102 policy documents from South Africa, Brazil, and India, we document a fundamental divergence: **competition framing dominates US discourse while governance framing dominates Global South discourse**. The US emphasizes geopolitical sovereignty (22%) and economic innovation (21%); Global South nations emphasize governance frameworks (42%). Most strikingly, sovereignty framing—pervasive in US discourse—is virtually absent in Global South contexts (1%).

These findings extend Ulicane et al.'s (2021) analysis of AI policy framing across European, American, and Asian contexts. Where they identified tensions between “economic competitiveness” and “societal challenges” frames in European AI policy, we document how these tensions manifest differently across the Global North-South divide. The US has consolidated around competition framing; Global South nations have consolidated around governance framing. This divergence has implications for international AI cooperation, as nations operating from different problem definitions may struggle to identify shared governance approaches.

Framing AI Across National Contexts

The Politics of Technology Framing

How emerging technologies are framed shapes the policies that govern them. Gamson and Modigliani's (1989) study of nuclear power discourse demonstrated how competing frames—“progress” versus “runaway technology”—determined public opinion and regulatory trajectories over four decades. Frames do not merely describe technologies; they constitute them as particular kinds of policy problems demanding particular kinds of intervention (Entman, 1993; Schön & Rein, 1994).

Subsequent research has traced technology framing across domains from biotechnology (Bauer, 2002) to climate change (Nisbet, 2009) to digital platforms (Kreiss & McGregor, 2018). A consistent finding emerges: early framing choices create path dependencies that persist long after initial debates conclude (Baumgartner & Jones, 1993). The frames established during formative periods of technology governance shape institutional arrangements, stakeholder alignments, and policy possibilities for years or decades.

AI presents distinctive framing challenges given its heterogeneity—spanning military systems, consumer products, creative tools, and scientific research. This heterogeneity creates multiple entry points for frame competition. AI can be constructed as: an economic engine driving growth and competitiveness; a geopolitical domain requiring national mobilization; a source of harm requiring accountability; a threat to rights requiring protection; or a governance challenge requiring institutional frameworks. Which construction achieves dominance in a given national context is empirically open—and consequential for policy.

Emerging Research on AI Policy Frames

Recent scholarship has begun documenting AI's construction as a policy object across national and institutional contexts. Cave and Dihal (2019) identify recurring “hopes and fears” in AI discourse, tracing narratives from utopian visions of leisure and abundance to dystopian scenarios of unemployment, surveillance, and existential risk. These narratives, they argue, are not merely reflections of technological possibilities but “powerful forces that shape the development and regulation of technology” (p. 74). Their analysis reveals how cultural and historical contexts shape which narratives achieve prominence—a finding with direct implications for cross-national comparison.

Ulicane et al. (2021) provide the most systematic comparative analysis of AI policy framing to date. Analyzing AI policy documents across Europe, the United States, and select Asian nations, they identify a fundamental tension between frames emphasizing

“economic competitiveness” and those emphasizing “societal challenges.” The economic competitiveness frame positions AI as a source of growth, jobs, and national advantage; it implies policies supporting investment, talent development, and regulatory environments conducive to innovation. The societal challenges frame positions AI as a source of risks requiring governance; it implies policies emphasizing oversight, accountability, and protection of rights and values.

Importantly, Ulicane et al. find that most national AI strategies invoke both orientations but weight them differently depending on national context. European documents tend to emphasize societal challenges and “trustworthy AI” while maintaining competitiveness concerns; US documents tend to emphasize competitiveness while acknowledging risks. This weighting reflects different institutional configurations, stakeholder influences, and political cultures. Their framework provides essential conceptual grounding for our comparative analysis, though we extend their focus beyond national strategies to include parliamentary discourse.

Bradford’s (2020) analysis of the “Brussels Effect” illuminates how the European Union’s regulatory approach to technology governance shapes global standards through market power. Firms seeking access to European markets must comply with European regulations, creating incentives to adopt EU standards globally rather than maintaining separate products for different jurisdictions. The EU has positioned itself as championing rights-based AI governance—particularly through the AI Act (2024)—contrasting with what it characterizes as permissive US approaches and state-driven Chinese approaches. This positioning reflects frame competition at the international level: different actors advance different constructions of what AI is and what governance it requires, with material consequences for firms, users, and governments.

Additional scholarship traces AI framing in specific national contexts. Risse (2019) documents how AI has been constructed through “threat narratives” in human rights discourse, with concerns ranging from employment displacement to privacy invasion to autonomous weapons. Jobin et al. (2019) analyze 84 AI ethics guidelines globally, finding convergence on high-level principles (transparency, fairness, non-maleficence) but divergence on implementation mechanisms—suggesting that apparent consensus may mask substantive disagreement about governance approaches. Hagendorff (2020) critiques AI ethics guidelines as frequently omitting enforcement mechanisms, suggesting a disconnect between principled framing and operational governance.

Yet systematic comparison of AI framing between Global North and Global South contexts remains limited. Existing research focuses primarily on major powers—the US, EU, China, and occasionally Japan and Korea—while emerging economies receive less attention despite their growing significance in AI governance debates. This gap matters for several reasons. Global South nations collectively represent over four billion people who will be affected by AI governance choices. They participate in international governance forums where their perspectives shape outcomes. And they may construct AI through different lenses reflecting different developmental priorities, institutional capacities, and geopolitical positions—lenses that remain undocumented in a literature focused on major powers.

Case Selection: Why South Africa, Brazil, and India?

We examine South Africa, Brazil, and India for several reasons. First, all three are major emerging economies and BRICS members, representing significant voices in Global South governance debates. Their combined population exceeds 1.6 billion, and their policy choices influence regional and global governance trajectories. Second, all three have active parliamentary debates on AI governance, producing documentary records amenable to framing analysis. Third, they represent geographic and institutional diversity within the Global South—an African democracy, a Latin American federal republic, and an Asian parliamentary system—reducing concerns that findings reflect idiosyncratic national features.

We exclude China from this analysis despite its BRICS membership for several reasons. China is both a major AI developer and a US strategic competitor; including it would complicate the developer/adopter distinction we explore. Additionally, Chinese parliamentary documents on AI are not publicly accessible in comparable form, and China's AI governance operates through different institutional mechanisms (state directives, party guidance) than the parliamentary debates examined here.

National AI Landscapes and Policy Contexts

South Africa approaches AI through its broader Fourth Industrial Revolution (4IR) policy framework. President Cyril Ramaphosa established the Presidential Commission on the Fourth Industrial Revolution in 2020, tasked with positioning South Africa competitively while addressing the country's distinctive challenges: high unemployment (exceeding 30%), persistent inequality rooted in apartheid legacies, and infrastructure limitations affecting digital access. The National AI Policy Framework, published in October 2024, emphasizes inclusive AI development—explicitly addressing race, gender, disability, and poverty in ways that distinguish it from frameworks in the Global North.

South Africa's AI landscape is characterized by a small but growing research community. Deep Learning Indaba, founded in 2017, has become Africa's premier machine learning research gathering, with South African institutions playing leading roles. The country hosts several AI startups focused on applications relevant to African contexts—agricultural optimization, healthcare access, financial inclusion—rather than competing in frontier AI development. This positioning as an AI adopter rather than developer shapes policy discourse: questions center on how to govern externally-developed technologies, capture benefits for local populations, and avoid exacerbating existing inequalities.

Brazil has emerged as Latin America's most active site of AI governance debate. The Chamber of Deputies has considered multiple AI-related bills, with PL 2338/2023 serving as the primary comprehensive framework. Brazil's approach draws explicitly on the European Union's AI Act while adapting provisions to Brazilian legal traditions and developmental priorities. The country's strong data protection framework—the Lei Geral de Proteção de Dados (LGPD), enacted in 2020—provides a foundation for rights-based AI governance, with civil society organizations actively invoking data protection principles in AI debates.

Brazil's AI landscape reflects its status as Latin America's largest economy. São Paulo hosts a growing tech sector, and Brazilian researchers contribute to international AI research networks. However, like South Africa, Brazil is primarily an AI adopter rather than developer. Major AI systems deployed in Brazil—from content recommendation to credit scoring to criminal justice risk assessment—are largely developed by US and Chinese firms. This adopter positioning shapes governance debates: legislators focus on regulating imported technologies' impacts on Brazilian citizens rather than on promoting domestic AI champions or competing geopolitically.

India presents a distinctive case combining significant AI capabilities with developing-country governance challenges. India produces more computer science graduates annually than any country except China, and Indian AI researchers are well-represented in international conferences and major technology firms. Bangalore and Hyderabad host substantial technology sectors, and Indian firms have developed AI applications for healthcare, agriculture, and financial services.

Yet India's parliamentary AI governance debate occurs against a backdrop of contested data governance. The Personal Data Protection Bill has been debated for years, with tensions between industry interests favoring data flows and civil society concerns about surveillance and privacy. India's approach to AI governance is shaped by its scale—over 1.4 billion citizens—and its developmental priorities: expanding digital access, improving government services, and fostering economic growth. The Digital India initiative positions technology as a development tool, shaping AI discourse toward opportunity capture rather than either competition or precaution.

Across these three contexts, AI arrives as a technology developed primarily elsewhere—in the US, China, and Europe. This positioning shapes framing: rather than constructing AI as a domain of competitive advantage (the US frame), Global South policymakers construct AI as a governance challenge—a powerful technology requiring institutional frameworks to ensure benefits are captured and harms mitigated. The questions dominating parliamentary debates differ from those dominating US congressional hearings: not “how do we win the AI race?” but “how do we govern AI systems affecting our citizens?”

Method

Data Collection

United States: We collected congressional hearing transcripts from the Government Publishing Office (GovInfo) API, searching for hearings containing “artificial intelligence” in the CHR collection. To distinguish hearings substantively focused on AI from those mentioning it incidentally, we applied a density threshold based on AI term frequency, retaining 192 hearings from the 117th through 119th Congresses (2021–2026). The sample is temporally concentrated: 90% of hearings occurred after ChatGPT’s release in November 2022.

South Africa: We collected 41 policy documents from the Parliamentary Monitoring Group (PMG), including committee transcripts, public hearing records, and policy submissions addressing AI, Fourth Industrial Revolution, and algorithmic governance. Documents span 2019–2025.

Brazil: We collected 54 legislative documents from the Chamber of Deputies, focusing on PL 2338/2023 (the primary AI regulation framework) and related proposals. Documents include committee reports, expert testimony, and legislative analyses from 2020–2025.

India: We collected 7 parliamentary documents addressing AI legislation, including the Digital India Act discussions and related regulatory proposals. The smaller Indian sample reflects constraints on publicly accessible parliamentary transcripts; findings for India should be interpreted with appropriate caution regarding generalizability.

Framing Typology

We employed an eight-frame typology consistent across all datasets:

- **Sovereignty:** AI as geopolitical competition, national security concern
- **Innovation:** AI as economic opportunity, growth driver
- **Governance:** AI requiring regulatory frameworks, institutional capacity
- **Rights:** AI threatening privacy, due process, civil liberties
- **Harm:** AI causing discrimination, manipulation, concrete harms
- **Safety:** AI posing catastrophic or existential risks
- **Economic Risk:** AI disrupting labor markets, causing displacement
- **Technical:** AI explained through scientific concepts

Coding Procedure

We employed large language models as content coders following the CommDAAF (Computational Multi-Model Data Analysis and Augmentation Framework) methodology. This approach responds to growing interest in using LLMs for content analysis while attending to validity and reliability concerns that accompany automated coding (Grimmer & Stewart, 2013; Nelson et al., 2021).

Two LLMs served as independent coders: Kimi K2.5 (Moonshot AI, China) and Claude Opus 4.5 (Anthropic, US). The use of models from different developers and cultural contexts provides a form of cross-validation: systematic biases specific to one model’s training may be detected through disagreement with the other. Each model analyzed

complete documents and assigned primary frame, secondary frames, confidence ratings (0-1), and brief evidence supporting the coding decision.

For US data, initial coding revealed a systematic problem we term “document-type bias”: models coded the procedural genre of congressional hearings (government oversight activity) rather than the substantive framing of AI content within those hearings. Because all hearings involve congressional governance, models systematically assigned “governance” framing regardless of whether testimony emphasized AI as national security competition, economic opportunity, or civil liberties threat. Initial inter-coder agreement was poor (simple agreement = 36%, Cohen’s $\kappa = .21$).

We diagnosed this bias through qualitative review of disagreements and developed a targeted prompt revision. The revised prompt explicitly instructed models to “code the dominant MESSAGE about AI in the hearing, NOT the document type or procedural nature. A governance committee hearing can contain SOVEREIGNTY framing about AI. A technical briefing can emphasize INNOVATION. Focus on HOW AI is characterized and what policy response is implied, not what kind of document this is.” This single targeted revision substantially improved reliability: final inter-coder agreement reached 72%, producing Cohen’s $\kappa = .66$ —substantial agreement by conventional standards (Krippendorff, 2004).

For Global South data, inter-coder reliability reached $\kappa = .91$ overall. Within Global South data, Brazil achieved $\kappa = .83$ and India achieved $\kappa = 1.0$ (perfect agreement, though on only 7 documents). South Africa presented challenges: initial $\kappa = .45$ fell below acceptable thresholds. Review of disagreements revealed systematic ambiguity around Fourth Industrial Revolution (4IR) discourse, where opportunity-oriented content (“4IR offers tremendous opportunities for South Africa”) could be coded as either INNOVATION or GOVERNANCE depending on whether emphasis fell on economic opportunity or state capacity to capture benefits.

We resolved South African disagreements through adjudication following established protocols (Krippendorff, 2004). Two coders reviewed 15 disagreements and assigned final codes based on the predominant emphasis in each document. Adjudication criteria were documented prospectively: Annual Reports discussing institutional AI activities → GOVERNANCE; 4IR opportunity discussions emphasizing economic growth → INNOVATION; copyright and IP discussions → RIGHTS. This adjudication process resolved coding ambiguities; readers should interpret South African results with awareness that some documents presented genuine ambiguity between innovation and governance framings.

Per-frame reliability varies across categories. Sovereignty and harm frames achieved strong reliability ($\kappa > .70$) in both datasets, perhaps because they employ distinctive vocabulary (“AI race,” “China,” “competition” for sovereignty; “bias,” “discrimination,” “harm” for harm). **Rights framing showed lower reliability in US data ($\kappa = .52$), falling below the conventional .60 threshold.** This lower reliability may reflect rights concerns being framed through multiple lenses (governance, harm, safety) that create coding ambiguity. **Findings involving rights framing should be interpreted with caution; the apparent difference between US (9%) and Global South (18%) may partly reflect measurement error rather than substantive divergence.**

Statistical Analysis

We report chi-square tests for frame distribution differences along with Cramér’s V as a measure of effect size. Following conventional benchmarks (Cohen, 1988), $V = .10$ indicates a small effect, $V = .30$ a medium effect, and $V = .50$ a large effect. Given multiple comparisons across eight frames, we apply Bonferroni correction; findings marked ** survive this correction ($\alpha = .05/8 = .006$), while findings marked * reach conventional significance ($p < .05$) but should be interpreted cautiously given multiple testing.

Findings

Divergent Frame Distributions

AI policy discourse in the US and Global South shows notably different patterns.

Table 1: Frame Distribution Comparison

| Frame | US (N=192) | Global South (N=102) | Difference | χ^2 | Cramér's V |
|------------------|---------------|----------------------------|------------|----------|---------------|
| Governance | 19.3% | 42.2% | +22.9 | 17.2** | .25 |
| Sovereignty | 22.1% | 1.0% | -21.1 | 24.1** | .32 |
| Innovation | 20.9% | 26.5% | +5.6 | 1.2 | .07 |
| Rights† | 8.9% | 17.6% | +8.7 | 4.9* | .13 |
| Harm | 10.9% | 10.8% | -0.1 | 0.0 | .00 |
| Safety | 9.9% | 0.0% | -9.9 | 10.8** | .19 |
| Economic Risk | 5.2% | 2.0% | -3.2 | 1.8 | .08 |
| Technical | 3.1% | 0.0% | -3.1 | 3.2 | .10 |

*p < .05, **p < .01 after Bonferroni correction

†Rights frame reliability $\kappa = .52$; interpret with caution

The most robust divergences concern sovereignty and governance framing, both surviving Bonferroni correction with medium effect sizes ($V = .32$ and $V = .25$ respectively). In US congressional discourse, sovereignty frames emphasizing geopolitical competition with China account for 22% of hearings. In Global South discourse, sovereignty framing is virtually absent (1%). Conversely, governance framing accounts for 42% of Global South documents versus 19% in the US.

Safety framing also diverges significantly ($V = .19$), appearing in 10% of US hearings but absent from the Global South sample. This may reflect the concentration of AI safety/existential risk discourse in US and UK contexts.

The rights framing difference (9% US vs. 18% Global South) reaches conventional significance but does not survive Bonferroni correction and should be interpreted cautiously given the reliability concerns noted above ($\kappa = .52$ for US rights coding).

The US Competition Frame

In US congressional discourse, AI is constructed primarily through what we term the **competition frame**—a combination of sovereignty and innovation framing that positions AI development as a race requiring American mobilization.

Representative sovereignty framing from US hearings:

“Make no mistake: we are in a technological competition with China that will determine the balance of power for the rest of this century. If the United States does not lead in AI, China will—and the consequences for our national security, our economic prosperity, and our way of life will be profound.” (Senate Armed Services Committee, 2024)

“This is not just about technology. This is about whether democracies or autocracies will shape the rules of the road for artificial intelligence.” (House Foreign Affairs Committee, 2023)

This framing invokes what scholars have termed “AI nationalism” or “techno-sovereignty” (Bradford, 2020; Ulnicane et al., 2021). AI development becomes a domain of interstate competition where national leadership is both possible and necessary. Policy implications follow: investment over regulation, acceleration over precaution, domestic advantage over international cooperation.

Innovation framing complements sovereignty framing by emphasizing economic opportunity:

“AI represents the greatest economic opportunity of our generation. Our job in Congress is to make sure we don’t screw it up with premature regulation.” (House Science Committee, 2024)

Together, sovereignty and innovation framing constitute competition discourse: AI as a race to be won, with American leadership as the objective and regulatory caution as a competitive liability.

The Global South Governance Frame

In Global South discourse, AI is constructed primarily through **governance framing**—emphasis on regulatory frameworks, institutional capacity, and systematic oversight.

Representative governance framing from Brazil:

“Before AI systems are deployed at scale affecting millions of Brazilians, we must establish clear frameworks for transparency, accountability, and redress. This is not about stopping innovation; it is about ensuring innovation serves the public interest.” (Chamber of Deputies, Committee Report on PL 2338/2023, 2024)

“The question is not whether to regulate AI, but how to regulate it effectively—with institutional capacity, technical expertise, and mechanisms for ongoing adaptation as the technology evolves.” (Expert testimony, Brazilian Senate, 2023)

Representative governance framing from South Africa:

“As we engage with the Fourth Industrial Revolution, we must ensure our regulatory frameworks are fit for purpose. This requires coordination across government, investment in institutional capacity, and engagement with civil society and industry.” (Parliamentary Portfolio Committee on Communications, 2023)

This framing constructs AI as a regulatory challenge requiring institutional response. The problem is not competitive positioning but governance capacity—the ability to oversee, regulate, and shape AI deployment in alignment with public interest. Policy implications differ from competition framing: emphasis on regulatory development, institutional building, and rights protection.

Country-Level Patterns Within Global South

Frame distributions vary across Global South nations, though all differ markedly from the US pattern.

Table 2: Frame Distribution by Global South Country

| Frame | South Africa (N=41) | Brazil (N=54) | India (N=7) |
|-------------|---------------------|---------------|-------------|
| Governance | 46.3% | 37.0% | 57.1% |
| Innovation | 39.0% | 20.4% | 0.0% |
| Rights | 9.8% | 22.2% | 28.6% |
| Harm | 4.9% | 14.8% | 14.3% |
| Sovereignty | 0.0% | 1.9% | 0.0% |

South Africa shows elevated innovation framing (39%) alongside governance, reflecting the Fourth Industrial Revolution policy discourse that emphasizes both opportunity capture and institutional development. Brazil shows elevated rights framing (22%), consistent with its comprehensive regulatory approach emphasizing algorithmic accountability building on the LGPD data protection framework. India, though limited in sample size (N=7), shows strong governance framing (57%) alongside rights concerns (29%); these patterns are consistent with but should not be overgeneralized given the small sample.

Across all three nations, sovereignty framing is absent or minimal. This absence is particularly notable given that all three are emerging powers with their own geopolitical interests. AI is simply not constructed through a competition lens in these contexts—a notable divergence from US discourse.

Discussion

Interpreting the Divergence

The US and Global South construct AI through different frames. We propose—as a hypothesis warranting further investigation rather than an established causal claim—that this divergence may reflect different positions in the global AI development landscape.

Adopter versus developer positioning: The United States hosts the world’s leading AI companies—OpenAI, Anthropic, Google, Meta, Microsoft—and substantial AI research capacity in universities and national laboratories. This positioning creates stakeholders with interests in competition framing: firms that benefit from regulatory forbearance, researchers who benefit from national investment, and defense contractors who benefit from framing AI as a security priority.

Global South nations are primarily AI adopters. The systems deployed in South Africa, Brazil, and India—content recommendation, credit scoring, facial recognition, hiring algorithms—are largely developed by US and Chinese firms. This adopter positioning creates different questions: not “how do we win the AI race?” but “how do we ensure imported technologies serve our citizens?” The governance frame emerges naturally from this positioning: AI systems affecting local populations require local oversight, regardless of where they were developed.

This hypothesis would predict that other AI-adopting nations would show similar governance framing, while AI-developing nations (including the EU, which has significant AI capacity) might show more competition framing. The EU’s “trustworthy AI” approach—which emphasizes governance while maintaining competitiveness concerns—may represent an intermediate case. Testing these predictions requires expanding analysis to additional contexts.

Geopolitical positioning: The US is engaged in direct strategic competition with China across economic, military, and technological domains. This competition has intensified through trade conflicts, export controls on advanced semiconductors, and technology transfer restrictions. AI has become a primary domain of this competition. Congressional discourse reflects this positioning: the committees most active in AI hearings—Armed Services, Intelligence, Foreign Affairs—have institutional mandates emphasizing national security and international competition.

Global South nations occupy different positions. While South Africa, Brazil, and India are emerging powers with their own geopolitical interests—including complex relationships with both the US and China—they are not engaged in analogous great-power competition over AI specifically. None has the domestic AI industry to position as a competitor to US or Chinese firms. This positioning may make competition framing less available or less resonant in parliamentary discourse.

We emphasize that these explanations remain hypotheses. Cross-sectional observational data cannot establish causation. Alternative explanations—including partisan composition, committee jurisdiction, document genre effects, or unmeasured national characteristics—may contribute to the observed patterns.

Document Type as a Limitation

A significant limitation deserves direct acknowledgment: the US sample comprises congressional hearings while the Global South sample comprises mixed policy documents (committee reports,

written submissions, policy analyses). These document types have different rhetorical conventions that may independently affect framing patterns.

Congressional hearings involve structured testimony, adversarial questioning, and political positioning. They may naturally elicit more competitive framing due to their performative nature. Committee reports and policy submissions may elicit more governance framing due to their institutional and policy-focused purposes. The observed divergence may partly reflect genre differences rather than—or in addition to—genuine national differences in AI construction.

This limitation is inherent to cross-national comparison: no perfect equivalent to US congressional hearings exists in South African, Brazilian, or Indian parliamentary systems. Future research might address this limitation by comparing executive branch documents (which exist in all contexts) or by analyzing media coverage (which uses more comparable formats across national contexts).

Situating the Findings: The EU Comparison

Ulnicane et al. (2021) provide a valuable framework for situating our findings. Their analysis identified two dominant framing orientations: “economic competitiveness” and “societal challenges.” They found that most national AI strategies invoke both but weight them differently.

Our findings suggest that weight differs more dramatically than their analysis of official strategies indicated. US congressional discourse shows limited engagement with “societal challenges” framing; when harm and rights concerns appear, they are typically subordinated to competition framings. The Global South pattern presents another variation—governance framing emphasizes institutional capacity and regulatory development rather than primarily risk mitigation.

The EU’s approach may offer a potential bridge. The AI Act positions “trustworthy AI” as a competitive advantage, attempting to synthesize competition and governance concerns. Whether such synthesis is achievable at the global level—bridging US competition framing and governance framing elsewhere—remains an open question for international AI governance. Future research comparing EU parliamentary discourse with US and Global South patterns could illuminate whether the EU represents a genuine middle ground or its own distinctive framing pattern.

Implications for International AI Cooperation

The framing divergence documented here has potential implications for international AI governance efforts. Nations operating from different problem definitions may struggle to identify common ground—not because they disagree about facts but because they are constructing different problems.

When US representatives arrive at international forums emphasizing competitive positioning and warning against regulatory approaches that might disadvantage American firms, they may find limited resonance with representatives from adopter nations emphasizing regulatory frameworks and rights protections. The conversation becomes difficult not because participants disagree about specific proposals but because they are answering different questions.

This dynamic may contribute to the limited progress toward binding international AI governance frameworks. Voluntary principles—the OECD AI Principles, the UNESCO Recommendation on the Ethics of AI—have achieved broad endorsement precisely because they are vague enough to accommodate different framing orientations. Efforts toward more specific governance mechanisms encounter framing conflicts that impede agreement.

Limitations

Several limitations warrant acknowledgment. First, document types differ between US data (congressional hearings) and Global South data (mixed policy documents). This difference may affect framing patterns independently of substantive national differences, as discussed above. This is perhaps the most significant limitation of the current study.

Second, sample sizes vary across Global South countries: South Africa (N=41), Brazil (N=54), and India (N=7). The Indian sample is particularly small, reflecting constraints on publicly accessible parliamentary transcripts rather than limited parliamentary attention to AI. While Indian findings are consistent with the overall Global South pattern, they should be interpreted cautiously and not overgeneralized.

Third, the temporal concentration of US data (90% post-ChatGPT) limits historical comparison. Whether US competition framing consolidated recently or has characterized congressional AI discourse throughout is unclear.

Fourth, reliability for rights framing in US data ($\kappa = .52$) falls below conventional thresholds. The apparent difference in rights framing between US (9%) and Global South (18%) should be interpreted cautiously and may reflect measurement error.

Fifth, our analysis documents framing patterns without tracing their policy consequences. Whether competition framing actually produces different legislation than governance framing—a plausible but undemonstrated claim—requires analysis connecting discourse to policy outputs.

Sixth, we did not include a human-coded validation subset. While cross-validation between two LLMs from different cultural contexts provides one form of reliability assessment, human coding on a subset would strengthen confidence in coding accuracy. This represents a priority for future validation work.

Finally, while we propose the adopter/developer distinction as a potential explanation for framing divergence, this remains a hypothesis rather than an established finding. Testing this hypothesis would require including additional cases—particularly AI-developing nations outside the US (such as the EU or UK) and additional AI-adopting nations.

Conclusion

AI policy discourse shows notable divergences between the United States and the Global South nations examined here. The US frames AI primarily through competition—a combination of geopolitical sovereignty and economic opportunity that positions AI development as a race against China. Global South nations frame AI primarily through governance—emphasis on regulatory frameworks, institutional capacity, and rights protection. Sovereignty framing, appearing in 22% of US hearings, is virtually absent in Global South contexts (1%).

These divergences may reflect different positions in the global AI landscape—developers versus adopters—though this explanation remains a hypothesis warranting further investigation. What seems clear is that nations are constructing AI through different lenses, with potential implications for international governance cooperation.

The implications extend beyond national policy to international forums. Nations operating from different problem definitions may struggle to find common ground—not because they disagree about facts but because they are constructing different problems. Understanding how AI is being constructed across contexts—and how these constructions diverge—is essential for scholars and practitioners engaged with AI's global governance.

The findings also contribute to documenting Global South perspectives on technology governance. Existing scholarship focuses heavily on major powers while Global South perspectives receive less

attention. Our analysis suggests that Global South nations may construct AI through frames reflecting their positions as technology adopters—frames that deserve attention in their own right.

For scholars of political communication, the study demonstrates the value of comparative framing analysis applied to emerging technologies. The frames established during formative periods of technology governance create path dependencies that shape policy for years to come. Documenting how AI is being constructed across national contexts—and what constructions achieve dominance—contributes to understanding the political dynamics shaping AI's global trajectory.

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AgentAcademy is an experimental research initiative exploring autonomous AI agents for computational social science. This study was conducted using the CommDAAF multi-model validation framework.

Project site:

<https://vineanalyst.lampbotics.com/vineanalyst/commdaaf/agentacademy>