

DOT BOTS CHALLENGE STATEMENT

STAGE I

Challenge Information

Challenge name: DOT Bots Challenge

Federal agency name: Office of the Assistant Secretary for Transportation Policy (OST-P), U.S. Department of Transportation (DOT)

Challenge focus: Advancing the deployment of robotics in transportation.

Anticipated individual awards: Multiple awards are anticipated. Total prize purse has maximum value of \$1,500,000.

Type of instruments that may be awarded: Cash prizes

Purpose: Support the development of new robotics platforms and use cases that can enhance safety for workers and travelers while improving how infrastructure is built, maintained, and operated.

Relevant Documents: DOT Strategy Report on the State of Robotics in Transportation (available at www.transportation.gov/policy-initiatives/nett/robotics)

Dates/Time: All times are Eastern Time Zone (ET)

- **Posting Date:** Wednesday, June 24th, 2026
- **Submission Due Date:** Monday, August 10th, 2026 at 5:00 PM ET

For submission questions or assistance, please email robotics@dot.gov. For frequently asked questions, updates, and additional information, please visit www.transportation.gov/policy-initiatives/nett/robotics.

Note: DOT reserves the right, in its sole discretion, to (a) cancel, suspend, or modify the Challenge, and (b) not award any prizes if no entries are deemed worthy.

1. Overview

Robotics have advanced significantly over the last decade, driven by rapid developments in artificial intelligence (AI), computer vision, battery performance, and other foundational technologies. Though the United States leads in the development of robotics capabilities and is home to advanced robotics companies, it faces steep competition from foreign nations.

In furtherance of its mission, the United States Department of Transportation (DOT) promotes the use of new and emerging technologies, including advanced robotics, with potential to improve transportation safety, efficiency, affordability, and project delivery. Today, robotics technologies are being used for numerous applications in transportation, including safety inspections, maintenance tasks, and certain aspects of construction.

Broader adoption in the transportation industry has the potential to further improve the safety, construction, operation, and maintenance of the transportation system. However, public sector stakeholders are often constrained in their ability to experiment with new technology due to funding limitations and risk aversion, which slows the benefits of these technologies in reaching the public.

The Department, therefore, established an Advanced Robotics Initiative to identify how DOT's resources and influence can be leveraged to expand awareness and implementation of domestic robotics solutions to solve existing and emerging transportation challenges. As part of this initiative, DOT is launching the DOT Bots Challenge to identify and advance new use cases and support American innovators.

For more information on the Advanced Robotics Initiative, please see the DOT Strategy Report on the State of Robotics in Transportation.

2. Challenge Details and Expected Outcomes

To enhance safety for workers and travelers, improve how transportation infrastructure is built, maintained, and operated, and encourage innovation, the Department is seeking ideas for applying advanced robotics technologies to existing or emerging public-sector transportation challenges. Concept papers may include innovative applications of off-the-shelf robotics platforms or newly developed robotics components, platforms, or technologies. Robotics technology is defined as follows:

Electromechanical devices that are capable of locomotion, navigation, or movement and operate at a distance from one or more operators or supervisors based on commands or in response to sensor data, or through any combination thereof.¹

As DOT already has extensive work underway focused on Automated Driving Systems (ADS), concept papers related to automated road vehicles or driving automation are not eligible for this challenge. This allows DOT's robotics strategy to highlight other promising robotics technologies.

In alignment with the goals noted above, the objectives of the DOT Bots Challenge include:

- To advance the application of robotics in specific areas of the transportation sector including, but not limited to, enhanced traveler and worker safety, improved inspections, expanded data collection and actionable uses, improving how existing tasks are performed and enabling the development of entirely new capabilities.
- To identify opportunities for deploying robotics to address challenges related to all modes of transportation and communities of every size and type.
- To raise awareness of transportation-related robotics applications and use cases, particularly those that can enhance traveler and transportation worker safety.

3. Challenge Structure

Timeline

DOT anticipates that the Challenge will proceed according to the schedule outlined below. Dates are subject to change with any changes being posted on the DOT Bots Challenge website accordingly.

- **Stage I Launch:** Wednesday, June 24th, 2026
- **Stage I Close:** Monday, August 10th, 2026 at 5:00 PM ET
- **Stage I Selection/Awards, Launch of Stage II:** Fall 2026 (anticipated)
- **Stage II Close; Prototype Demonstrations:** Fall 2027 (anticipated)
- **Stage II Prize Selections:** Fall 2027 (anticipated)

¹ Adapted from the definition of "Covered Unmanned Ground Vehicle System" included in the Servicemember Quality of Life Improvement and National Defense Authorization Act for Fiscal Year 2025, Pub. L. No. 118-159, 138 Stat. 1773 (2024).

Stage I, Concept Paper

In Stage I, eligible Participants will submit concept papers describing an idea for robotics solutions that address public sector transportation needs. DOT will select up to five finalists to receive a Stage I cash prize and qualify to develop a functional prototype of their idea during Stage II.

Stage I concept papers will be limited to written, descriptive summaries (no more than 10 pages; see “Stage I Submission Requirements” below for additional detail on concept paper length constraints), supporting visual exhibits, a brief slide deck, and accompanying information (e.g., a Stage II work plan, team biographies) as outlined in Section VI.

Stage II, Prototype/Demonstration

In Stage II, the finalists selected to advance from Stage I will develop their concepts into functional prototypes of a robotics solution. A functional prototype should consist of a fully operational robotics solution and may be a modification of an existing off-the-shelf platform or a newly developed technology. A virtual prototype does not meet the requirements for this challenge. The target technology readiness level (TRL)² at the end of Stage II is 6-7 (prototype demonstrated in relevant or operational environment). Projects that are expected to reach TRL 5 (integrated components demonstrated in a laboratory environment) may also be considered if warranted based on other submission characteristics.

Finalists will demonstrate their prototype at locations to be determined by DOT in consultation with each finalist. DOT anticipates that Stage II demonstrations will be attended in-person by DOT officials and subject matter experts. To ensure parity of deadlines between teams, participants may also be asked to submit a video of their demonstration in advance of the in-person demonstration. Hybrid demonstration formats may be utilized if needed. The final prize selection will be announced after all demonstrations have been completed, contingent upon review of the Stage II demonstrations against the judging criteria.

The details of Stage II are subject to change and will not be finalized until Stage I is complete. Stage II will only be open to Stage I finalists, however, at DOT’s discretion, additional teams may be invited to participate. DOT may, in its sole discretion, not proceed with Stage II.

² Federal Highway Administration Research and Technology (2017). Technology Readiness Level Guidebook. Publication Number FHWA-HRT-17-047. <https://www.fhwa.dot.gov/publications/research/ear/17047/index.cfm>

4. Prizes

The DOT Bots Challenge consists of two stages through which teams will compete for an overall prize purse of up to \$1,500,000.

In Stage I, DOT will select up to five finalists to advance to Stage II to develop a functional prototype of their idea and compete for a cash prize. Stage I finalists will each receive \$100,000 in prize money, which may be used to support the development of their prototype in Stage II. In Stage II, DOT will select one winning team to receive the remaining prize purse. Prizes will be structured as follows:

- Stage I Proof-of-Concept: Total prize funds awarded = Up to \$500,000.
 - Up to 5 finalists will be selected
 - Each will receive \$100,000 upon selection as a Stage I Finalist
- Stage II Demonstration: Total prize funds awarded = \$1,000,000
 - One winner will receive \$1,000,000

Recognition and Showcase

In addition to cash prizes, winners will receive national recognition:

- **Stage II Live Demonstrations:** Finalists will have the opportunity to demonstrate their concepts to senior DOT officials.
- **Feature:** Winning submissions will be featured on official DOT communication platforms, and potentially a live event, serving as exemplars for future projects.

5. Judging Criteria

Only submissions that meet the eligibility requirements will be evaluated. For Stage I judging, submissions will be evaluated by a multidisciplinary technical review team of DOT experts representing various backgrounds in robotics, transportation planning, transportation policy, and engineering, and bringing expertise and experience in the use of robotics across transportation modes. The panel will assess how effectively each concept demonstrates the potential for improving public-sector transportation operations.

Evaluators will evaluate submissions according to each judging criterion, using a three-point scale: Highly Recommended, Recommended, or Not Recommended. They will support their ratings of Highly Recommended with comments on strengths, ratings of Recommended with comments on strengths and some weaknesses, and their ratings of Not Recommended with

comments on weaknesses or deficiencies. For evaluation purposes, strengths are considered an outstanding or exceptional approach to addressing the criteria. Weaknesses are considered a flaw or gap in how the concept paper addresses the criteria. Significant weaknesses are weaknesses substantially below expectations for addressing the criteria. Finally, a deficiency is considered a potentially significant flaw or absence of information to address the criteria. If a Highly Recommended submission includes minor weaknesses, evaluators may provide recommendations for items to be addressed during Stage II.

The rating levels are:

- **Highly Recommended:** The submission offers a superior approach that fully addresses the judging criteria and presents an exceptional concept. Demonstrates multiple strengths and no significant weaknesses or deficiencies. The concept paper includes data and logical arguments fully explaining how the proposed approach will address the criteria. The concept paper clearly, concisely, and professionally explains how the submission addresses the criteria. May include minor weaknesses or limitations.
- **Recommended:** The submission offers a solid approach that successfully addresses the criteria. The concept paper displays no significant deficiencies. However, it may demonstrate weaknesses or limitations, so long as these do not prevent the concept paper from adequately addressing the judging criteria. The submission includes information explaining how the proposed approach will address the criteria but may have minor gaps or leave room for improvement in detail or clarity.
- **Not Recommended:** The submission fails to address the judging criteria adequately or contains major weaknesses, deficiencies, or both. The concept paper does not clearly, concisely, or professionally address how the submission addresses the criteria.
- **Not Addressed:** The submission does not address the judging criterion. Note: proposals receiving one or more ratings of “Not Addressed” may be excluded from consideration, regardless of scores on other categories.

The description of individual judging criteria provides further guidance on how these general rating levels apply to specific categories.

Evaluators will read and rate the submissions independently and then come together in a consensus meeting to review the composite score outcome and select which concept papers should be recommended to a Senior Review Team (SRT). The group will identify key strengths and weaknesses that led to the decision.

Stage I Judging Criteria

The judging panel will consider each submission's alignment with each of these criteria and make recommendations to an SRT and ultimately to the Secretary of Transportation. The Secretary will select as finalists those submissions that best advance the purposes of the Challenge.

Stage I judging criteria include the following categories:

1. **Team Composition, Qualifications, and Project Eligibility**
 - a. Does the submission establish that the team and project meet all eligibility requirements as described in Section VI?
 - b. Does the submission describe the team's composition and how its background supports the solution development? The concept paper should describe skills and knowledge needed for the project and explain which team member(s) supply them (as opposed to general bios, which should be included in an appendix; see section VI). Relevant skills may include robotics skills, knowledge of/experience with potential end users, and any other assets that could help the project team successfully produce the prototype for this competition or ensure that it meets end user needs effectively.
 - For a "Highly Recommended" Team and Project Eligibility rating, a concept paper must successfully address both preceding criteria, including discussing supporting evidence or data when appropriate.
2. **Technical Merit:** Overall quality and feasibility (materials, cost, safety) of the concept.
 - a. Does the submission demonstrate an understanding of the problem/need being met as well as limitations?
 - b. Does the submission clearly describe the prototype to be produced?
 - c. Does the submission credibly describe plans to produce a prototype in the time available? The plans should address tasks/work areas, team member responsibilities, potential barriers or challenges, and how barriers/challenges can be overcome.
 - d. Does the submission credibly describe the mechanism by which the proposed solution would address one or more challenges or needs in transportation?
 - For a "Highly Recommended" Technical Merit rating, a concept paper must successfully address all four of the preceding criteria, including discussing supporting evidence or data when appropriate.
3. **Impact and Availability:** Potential of the solution to improve how public sector agencies construct, maintain, and operate the transportation system.

- a. Does the submission (1) describe an existing or emerging public-sector transportation agency need, (2) explain how the proposed project would meet that need, and (3) explain how this improves upon existing solutions?
 - b. To what extent is the solution adaptable to more than one mode of transportation?
 - c. To what extent is the concept replicable to other agencies, domains, etc.?
 - d. Are the solution’s potential benefits proportional to the anticipated cost? (e.g., a modest expected benefit can be competitive if the anticipated cost is low, whereas a higher-cost solution will be more competitive if its impacts are also proportionally higher)
 - e. Does the concept paper describe any regulatory or policy issues that might constrain adoption of the proposed robotics application?
 - For a “Highly Recommended” rating for Impact and Availability, a concept paper must successfully address criterion 3a and at least three other criteria in this section (for a total of four), including discussing supporting evidence or data when appropriate.
4. **Potential Market:** Potential to meet the needs and constraints of a demonstrated market.
- a. Does the submission credibly describe a potential market for the product?
 - b. Has the applicant demonstrated a clear understanding of public sector needs and industry capabilities?
 - c. Has the research team incorporated or demonstrated plans to incorporate perspectives of potential users, industry, or both?
 - d. Does the submission demonstrate the project’s applicability to multiple community types? (e.g., rural, urban, small, large, high- and low-density, weather conditions, topography)
 - e. Does the submission explain how the technology can be made market-ready at an accessible price point (relative to its impact and the defined market) for communities like those described in 3(d)? Multiple types of ownership models can be considered (e.g., individual ownership, rental agreements, service for hire).
 - f. What is the team’s approach to meeting domestic sourcing requirements, such as those often required for procurements by public sector agencies?
 - For a “Highly Recommended” Potential Market rating, a concept paper must successfully address criteria 4(a), 4(b), and at least three other criteria in this section (for a total of five), including discussing supporting evidence or data when appropriate.

5. **Innovation and Creativity:** Originality of the idea and its potential to shape the future of robotics in transportation.
 - a. Does the prototype explore new applications or use cases, a new or novel robotics platform, or both?
 - b. Does the concept paper leverage existing resources in an innovative way?
 - For a “Highly Recommended” Innovation and Creativity rating, a concept paper must successfully address at least one of the preceding criteria, including explaining what differentiates the project from existing approaches and providing supporting evidence or data when appropriate

Table 1: Summarized Requirements for “Highly Recommended” Category Ratings

Judging Category	Total Number of Criteria in Category	Successfully Addressed Criteria to Qualify for “Highly Recommended” Category Rating	Specific Requirements for “Highly Recommended” Category Rating
1. Team Composition, Qualifications & Project Eligibility	2	All (2)	All criteria in category
2. Technical Merit	4	All (4)	All criteria in category
3. Impact and Availability	5	4+	3(a) and at least three others
4. Potential Market	6	5+	4(a), 4(b), and at least three others
5. Innovation and Creativity	2	1+	One or both criteria

Draft Stage II Judging Criteria

Stage II judging criteria will be finalized and issued to Stage II participants upon the completion of Stage I based on insights and feedback gained during Stage I. DOT anticipates that the criteria from Stage I will carry over—with adaptation, as needed—to the judging of Stage II submissions, with a focus on technology maturity and demonstration results.

6. How to Enter

Step 1: Complete the Official Intake Form

Visit the challenge website to access the official Google Form intake page. You will be asked to provide:

- **Submitter Information:**
 - Contact details for the team lead
 - Note: You must provide a valid, active email address to receive confirmation of receipt and notifications.
- **Submission Details:**
 - Project title
 - Responses to brief multiple choice and short-answer questions about the proposed project and your team's eligibility (see Eligibility Requirements below)

Note: If you are submitting more than one entry, you must complete a unique intake form for each entry.

Step 2: Create your submission materials (see Submission Package Requirements below)

Step 3: Prepare Your Submission Package

Compile all required submission materials into a single ZIP folder.

- **File Organization:**
 - Ensure you have included required documents.
 - Ensure individual files are clearly labeled. (e.g., TeamName_ProjectTitle_Narrative.pdf)
- **Zip File Naming Convention:**
 - You must name your ZIP folder using the following format to ensure proper recording of submission: TeamName_ProjectTitle.zip.
- **Multiple Files:**
 - If your submission requires multiple files due to email size restrictions, add 1of2, 2of2 to zip file names. (e.g., TeamA_InspectionBot_1of2.zip, TeamA_InspectionBot_2of2.zip).

Step 4: Submit Your Files via Email to robotics@dot.gov

After completing the Intake Form, email your zip file(s) to the above address. If materials exceed email attachment size limitations, provide a secure link to download the materials.

- Zip files must contain all required submission materials (Narrative and Slide Deck) to be eligible for consideration.
- Incomplete submissions will not be evaluated.

Note: If you are submitting more than one entry, you must submit a separate email for each entry.

All entries must be received by **Monday, August 10th, 2026 at 5:00 PM ET**. For submission questions or assistance, please email robotics@dot.gov.

Submission Package Requirements

Stage I Submission Requirements

All Participants must submit a complete package to be considered for an award.

1. A cover page with the following information:
 - a. Submission title;
 - b. Brief description of the submission (~15 words);
 - c. Team name, lead organization, other participating organizations, participant(s) name(s), and primary contact information for Team Lead (name, telephone number, email address); and
 - d. Transportation mode(s) addressed.
2. A one-page executive summary of the concept being proposed (12-point standard font with 1-inch margins).
3. A concept paper (10-page limit, 12-point standard font with 1-inch margins) of the concept being proposed, including but not limited to the following content:
 - a. A detailed technical description of the proposed solution discussing its functionality and capabilities, demonstrating the user needs being met and how, and strategies involved in integrating the proposed solution into transportation operations. The paper should explain how the team arrived at its understanding of these issues, including its process for incorporating guidance from potential users, industry, or both, as relevant;
 - b. Describe how the proposed solution will meet the objectives of the Challenge and how it satisfies each of the Judging Criteria (Section V); and
 - c. Discuss the team's assessment of the market readiness of the proposed solution, including cost considerations. The team should also discuss how its concept paper has been informed by specific partners to understand the needs and

constraints of both industry and a public-sector transportation provider as part of explaining the feasibility and impact of the concept paper.

4. A work plan/schedule for Stage II competition participation (prototype development), resources, and costs. The plan should assume a timeline of 52 weeks from the time Stage I finalists are announced to the final submission deadline for Stage II. The timeline will be finalized when Stage I finalists are notified. No specific format is required, but Gantt charts, timelines, tables, or graphics may be used to convey information efficiently. The plan should be 1-4 pages including any visual elements.
5. Appendices
 - a. Information on the qualifications of your team –briefly describe the makeup of the team and include a résumé or bio of key individual(s).
 - b. The name and affiliation of any representatives who you plan to have serve as an advisor during the Stage II prototyping phase and how you plan to use them.
 - c. Supporting technical data and figures, if available, should be included as an appendix, which does not count towards the 10-page limit of the concept paper.
6. Overview Slides: Two slides providing an overview of the project and its key benefits using the slide template available on the DOT Bots Challenge website. For compatibility reasons, it is recommended that applicants not make changes to the template (e.g., fonts or colors). Embedding charts/graphs as images is acceptable.

Eligibility Requirements

- **Eligible Entities:** The DOT Bots Challenge is open to teams from the academic, research, public sector, and business communities including, but not limited to, universities, research institutions, technology companies, entrepreneurs, and public sector agencies. All applicant teams must include at least one private sector member such as a robotics developer or service provider, or a private sector organization that might incorporate robotics into their products or services. Individuals are eligible to participate as part of a team that otherwise meets the eligibility requirements.
- **Residency Requirement:** In the case of a private entity, shall be incorporated in and maintain a primary place of business in the United States, and in the case of an individual, whether participating singly or in a group, shall be a citizen or permanent resident of the United States.
- **Restrictions:** Federal employees or entities acting within the scope of their employment are not eligible.

- **Project Types:** Projects must focus on robotics technology as defined in Section II. Concept papers focused on ADS are not eligible.
- **Regulatory Compliance:** The demonstration proposed for Stage II must comply with all relevant Federal, State, and local laws and regulations. If a waiver or exemption is required to achieve compliance, the applicant should note that such exemptions or waivers will be needed and present a plan for obtaining them.

In addition, these two restrictions apply to recipients of other Federal funds:

1. Federal grantees or recipients of Federal cooperative agreements may not use Federal funds to develop submissions for this Challenge unless consistent with the purpose of their grant award or cooperative agreement; and
2. Federal contractors may not use Federal funds from a contract to develop prize competition applications or to fund efforts in support of a prize competition submission.

7. Rules

Liability and Insurance Requirements

By registering and entering a submission, each participant agrees to assume any and all risks and waive all claims against the Federal Government and its related entities, except in the case of willful misconduct, for any injury, death, damage, or loss of property, revenue, or profits, whether direct, indirect, or consequential, arising from their participation in this competition, whether the injury, death, damage, or loss arises through negligence or otherwise. By registering and entering a submission, each Participant further represents and warrants that it possesses sufficient liability insurance or financial resources, to the extent permitted by applicable law, to cover claims by a third party for death, bodily injury, or property damage or loss resulting from any activity it carries out in connection with its participation in this competition, or claims by the Federal Government for damage or loss to government property resulting from such an activity. Challenge winners shall be prepared to demonstrate proof of insurance or financial responsibility in the event DOT deems it necessary.

Payment of the Prize

Cash prizes awarded under this Challenge will be paid to the designated Team Lead directly by DOT through electronic funds transfer. Winner(s) will be responsible for any applicable local, State, and Federal taxes and reporting that may be required under applicable tax laws. DOT will comply with Internal Revenue Service withholding and reporting requirements, where

applicable. For proposals submitted by a team, following payment to the Team Lead, DOT will not be involved in determining how prize money is divided or distributed amongst the team members.

Confidential and Business Information

Challenge submissions and communication with DOT are subject to the Freedom of Information Act (FOIA, 5 U.S.C. § 552). If the application includes information that the applicant considers to be a trade secret or confidential commercial or financial information, the applicant should do the following: (1) Note on the front cover that the submission “Contains Confidential Business Information (CBI)”; (2) mark each affected page “CBI”; and (3) clearly highlight or otherwise denote the paragraph and sentences that contains CBI. DOT protects such information from disclosure to the extent allowed under applicable law. In the event DOT receives a FOIA request for the information, DOT will follow the procedures described in its FOIA regulations at 49 C.F.R. § 7.29. Only information that is ultimately determined to be confidential under that procedure will be exempt from disclosure under FOIA. DOT reserves the right to publish any application information that is not marked as CBI.

Usage of Artificial Intelligence (AI)

Any use of AI tools (*i.e.*, generative AI or large language model [LLM, *e.g.*, ChatGPT]) in the preparation of the submission must be disclosed. If AI tools were used, indicate what AI tool(s) were used, the approximate percentage of the document that was generated or assisted by AI, and briefly describe the purpose (*e.g.*, language enhancement, content generation) of such use. Each team or applicant remains fully responsible for verifying the accuracy, originality, and ethical integrity of all content, including AI-generated portions. DOT reserves the right to reject any challenge submission that may have used AI in an unethical or illegal manner.

Representation, Warranties, and Indemnification

By entering the Challenge, each applicant or participant represents, warrants, and covenants as follows:

- Applicant is the sole author, creator, and owner of their submission;
- The submission is not the subject of any actual or threatened litigation or claim;
- The submission does not and will not violate or infringe upon the intellectual property rights, privacy rights, publicity rights, civil liberties, civil rights, or other legal rights of any third party;

- The submission does not and will not contain any harmful computer code (sometimes referred to as “malware,” “viruses,” or “worms”); and
- The submission, and Participants’ use of the submission, does not and will not violate any applicable laws or regulations.

If an applicant or participant is unable to make any of the warranties as stated above, that applicant or participant must provide a clear written explanation of the reason(s) it cannot make any specific warranty. DOT will, in its sole discretion, determine whether such explanations are sufficient and acceptable.

Intellectual Property of Submissions

Participants can utilize intellectual property developed prior to this prize competition as a part of their submission. Neither the DOT nor anyone acting on its behalf will obtain any rights in intellectual property developed prior to or during this prize competition without the prior written consent of the participant. By participating in the prize competition, the Participant is not granting rights in any patents, pending patent applications, or copyrights related to the technology described in their submission. However, by submitting their entry, the participant is granting the DOT and any parties acting on its behalf certain limited rights as set forth herein. By virtue of their submission to this prize competition, participants grant to DOT and any parties acting on their behalf the right to:

1. Review, screen, and evaluate submitted materials per the Evaluation Criteria as detailed below.
2. Use the submitted materials in the consideration of the formulation and establishment of DOT research programs.
3. Describe the submission in any materials created in connection with this prize competition.

Participant further grants the DOT, and anyone acting on its behalf the right to publicize participant’s name and, as applicable, the name of participant’s team members and the name of any Entity that assisted in preparing participant’s submission. Such authority includes posting or linking to the participant’s submission on DOT websites, including the Challenge website, and inclusion of the participant’s submission in any other media, worldwide, subject to the above restrictions relating to confidential business information. More specifically, such authority includes the right to copy, distribute, publicly display, and publicly perform all parts of Participant’s submission that would not otherwise be exempt from disclosure under FOIA.