



July 1, 2020

Dear Valued Customer

Re: Buy American – Buy America

ILLUMRA is proud to support projects throughout the United States and Canada. Occasionally there are questions about our lighting control systems and if they meet the requirements of Buy American and Buy America Acts. ILLUMRA systems meet the requirements of Buy American and Buy America Acts based on the information below.

### **Buy American**

#### **NAFTA**

Under NAFTA, the U.S. requires that Canadian goods and suppliers be exempt from these requirements if procurement is being done directly by a listed U.S. federal department or agency and if the value of procurement exceeds NAFTA thresholds (currently US\$25,000 for goods, US\$77,533 for general services and US\$10,079,365 for construction services).

#### **COTS (Commercial-off-the-shelf)**

These components are defined under the “Domestic Material” section of Buy American defined as:

“Domestic material. The Government requires that the cost of a product's components mined, produced or manufactured in the United States must exceed 50% of the cost of all of its components, unless waived as a commercial off-the-shelf (COTS) product.”

Our components are either manufactured in USA or COTS products as defined:

“Commercially available off-the-shelf item means any item or supply (including construction material) that is:

- (i) A commercial item
- (ii) Sold in substantial quantities in the commercial marketplace; and
- (iii) Offered to the Government under a contract or subcontract at any tier, without modification, in the same form in which it is sold in the commercial marketplace.”

FAR2 Subpart 2.101

ILLUMRA products are waived from the Buy American Domestic Material requirement as they are either manufactured in the USA or COTS products as defined above.



## Buy America

<https://www.gpo.gov/fdsys/pkg/CFR-2017-title49-vol7/xml/CFR-2017-title49-vol7-part661.xml>

Title 49 CFR part 661

(d) For a manufactured product to be considered produced in the United States:

- (1) All of the manufacturing processes for the product must take place in the United States; and
- (2) All of the components of the product must be of U.S. origin. A component is considered of U.S. origin if it is manufactured in the United States, regardless of the origin of its subcomponents.

ILLUMRA components meet the Buy America requirements of US production as the final manufacturing, assembly, programming, and testing of the system is done at our manufacturing facility in Utah.

*Certificate of Compliance with 49 U.S.C. 5323(j)(1)*

Illumra/Ad Hoc Electronics hereby certifies that it will meet the requirements of 49 U.S.C. 5323(j)(1) and the applicable regulations in 49 CFR Part 661 and any amendments thereto.

Company Name: ILLUMRA/Ad Hoc Electronics  
115 S. State St., Ste B  
Lindon, Utah 84042

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Jan Finlinson, President

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Date