



Commanding a Higher StandardSM

THE PHOENIX FORGE GROUP

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PRODUCT SPECIFICATION BULLETIN CERTIFICATION of COMPLIANCE ARRA BUY AMERICA ACT OF 2009 COMPLIANCE

We hereby certify that all of the Phoenix*Capitol*Camco and Conduit Pipe Products manufactured in the United States of America regardless of the starting raw material country of origin complies with the following criteria thus conforming to the Buy America ARRA (American Recovery and Reinvestment Act) of 2009:

ARRA Buy America Act of 2009 Substantial Transformation Checklist

| Questions for Determining Whether Substantial Transformation Has Occurred In the United States of America | Yes | No |
|---|-----|----|
| 1. Were all of the components of the manufactured good manufactured in the United States, and were all of the components assembled into the final product in the U.S.? (If the answer is yes, then this is clearly manufactured in the U.S. and the inquiry is complete). | Yes | |
| 2. Was there a change in character or use of the good or the components? | Yes | |
| 3. Was (/were) the process (es) performed in the U.S. (including but not limited to assembly) complex and meaningful? | Yes | |

Substantial transformation has occurred in the U.S. if answer is Yes to Questions 1, 2, and 3

| To Answer Question 2, Ask the Following | Yes | No |
|--|-----|----|
| 2. Was there a change in character or use of the good or the components in the America? (These are asked about the finished good as a whole , not about each individual component) | Yes | |
| a. Was there a change in the physical and/or chemical properties or characteristics designed to alter the functionality of the good? | Yes | |
| b. Did the manufacturing or processing operation result in a change of a product (s) with one use into a product with a different use? | Yes | |
| c. Did the manufacturing or processing operation result in the narrowing of the range of possible uses of a multi-use product? | Yes | |

If answer is yes to any of 2a, 2b, or 2c, then the answer to question 2 is Yes

| To Answer Question 3, Ask the Following | Yes | No |
|---|-----|----|
| 3. Was (/were) the process (es) performed in the U.S. (including but not limited to assembly) complex and meaningful? | Yes | |
| a. Did the process (es) take a substantial amount of time? | Yes | |
| b. Was (/were) the process 9 (es) costly? | Yes | |
| c. Did the process (es) require particular high level skills? | Yes | |
| d. Did the process (es) require a number of different operations? | Yes | |
| e. Was substantial value added in the process (es)? | Yes | |

If answer is yes to any of 3a, 3b, 3c, 3d, or 3e then the answer to question 3 is Yes

Note: This does not apply to products manufactured by CapProducts of Canada

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