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Manufacturer's Certificate of Compliance

Date: May 16, 2011

Veris Industries, LLC hereby certifies the following:

As of the date shown on the attachment, products listed in the attached Schedule A are produced in the US within the meaning of 2 CFR 176.140 and section 1605 of the American Recovery and Reinvestment Act of 2009 at our manufacturing facility in Portland, Oregon. In response to Question 2 of the attached guidance, the listed products undergo a change in character or use from any foreign supplied components used in manufacture, or substantial value is added in a number of complex operations.

Please note, some items in Schedule A include a "U" at the end of the part number, which differs from the equivalent standard catalog product. Purchase of "U" versions assures US manufacture in cases where we may obtain products from multiple sources.

In the event that international agreements apply, Veris Industries, LLC also hereby certifies as of the date indicated on the attached Schedule B that the products listed therein are substantially transformed in the country indicated, and thus are designated country manufactured goods within the meaning of 2 CFR 176.160.

By: _____

A handwritten signature in black ink, appearing to read "Frank Morey", written over a horizontal line.

Frank Morey, President

Substantial Transformation Analysis Questions

The questions below are designed to assist award recipients in determining if substantial transformation has occurred. Simple yes/no answers, especially to the more subjective queries in Question 3, are not sufficient, rather, the answers should be elaborated with an explanation of why the answer is 'yes'.

Question 1

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, and includes a detailed supporting explanation, then this is clearly manufactured in the U.S., and the inquiry is complete)

Question 2

Because each of the sub-questions of 2 call for relatively significant and demanding steps, the answer to question 2 is "yes" if answer to any of 2a, 2b, or 2c is "yes" and is supported with appropriate detail/analysis.

2. Was there a change in character or use of the good in the United States? (These questions are asked about the finished good as a whole, not about each individual component)
 - a. Was there a change in the physical and/or chemical properties or characteristics designed to alter the functionality of the good?
 - 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?
 - c. Did the manufacturing or processing operation result in the narrowing of the range of possible uses of a multi-use product?

Question 3

If the answer to at least two of 3a, 3b, 3c, 3d, or 3e is "yes", then the answer to Question 3 is "yes". Manufacturers who wish to establish beyond a doubt that their product has been substantially transformed in the U.S. via answers to Question 3 will want to provide descriptions of their process (es) that support affirmative answers to as many of the sub-questions as are applicable, to increase the likelihood that the answers to at least two of the questions are sufficient.

3. Was (/were) the process(es) performed in the U.S. (including but not limited to assembly) complex and meaningful?
 - a. Did the process(es) take a substantial amount of time?
 - b. Was(/were) the process(es) costly?
 - c. Did the process(es) require particular high-level skills?
 - d. Did the process(es) require a number of different operations?
 - e. Was substantial value added in the process(es)?