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American Recovery and Reinvestment Act 2009 (ARRA)

Questions for Determining Whether Substantial Transformation Has Occurred in the US

This Certification pertains to the following
equipment and/or material:

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 US? Yes No

(If the answer is Yes, then this is clearly manufactured in the US, and the inquiry is complete. Proceed to #4 below. If the answer is No, provide responses to questions 2 & 3.)

Was there a change in character or use of the good or components in America? Yes No

(These questions are asked about the finished good as a whole, not about each individual component).

2. **To Answer Question 2, Ask the Following:**

- a. Was there a change in the physical and/or chemical properties or characteristics designed to alter the functionality of the good? Yes No
- 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 No
- c. Did the manufacturing or processing operation result in the narrowing of the range of possible uses of a multiuse product? Yes No

3. Was(/were) the process(es) performed in the US (including but not limited to assembly) complex and meaningful?

Yes No

To Answer Question 3, Ask the Following:

- a. Did the process(es) take a substantial amount of time? Yes No
- b. Was(/were) the process(es) costly? Yes No
- c. Did the process(es) require particular high level skills? Yes No
- d. Did the process(es) require a number of different operations? Yes No
- e. Was substantial value added in the process(es)? Yes No

(If the answer is yes to at least two of 3a, 3b, 3c, 3d, or 3e, then the answer to Question 3 is yes. Provide (attach) documentation to illustrate the affirmative answers to these questions.)

4. **Substantial transformation has occurred in the US if the answer is Yes to either Question 1, 2, or 3.**

Name of Manufacturer Kris Tech Wire Company
Address of Manufacturer 921 Seneca Street, PO Box 4377, Rome NY 13440
Name/Title of Certifying Rep. David Petrie, Quality Manager

I hereby certify that the manufactured good(s) described above meets the "Buy American" Provisions of Section 1605 of the American Recovery and Reinvestment Act of 2009 (ARRA).

(Signature of Manufacturer Certifying Representative)

March 10, 2010

(Date)