



September 01, 2023

## Certification of Buy American Compliance

Aeroflex USA, Inc. (“Aeroflex”) provides this Buy American certification regarding the following AEROFLEX® brand products:

AEROFLEX EPDM™ Unslit Tube Insulation  
AEROFLEX Self-Seal™ EPDM Pipe Insulation  
AEROFLEX Breathe-EZ™ EPDM Duct Insulation  
AEROFLEX Breathe-EZ™ PSA EPDM Duct Insulation  
AEROFLEX EPDM™ Sheet and Roll Insulation (thicknesses ¼”+)  
AEROFLEX EPDM™ Sheet and Roll Insulation with PSA (thicknesses ¼”+)  
AEROFLEX® White/Gray EPDM Unslit Tube Insulation  
AEROFLEX® White/Gray Self-Seal EPDM Pipe Insulation  
AEROFLEX® w/ SANIGUARD™ EPDM Pipe Insulation, PVC Jacket, PVC Tape & Welding Adhesive  
AEROFLEX EPDM™ CONTINUOUS Tube Insulation  
AEROFLEX® AEROFIT™ EPDM Fitting Covers  
AEROFLEX® AEROFIT™ White/Gray EPDM Fitting Covers  
AEROFLEX® AEROFIT™ SaniGuard™ EPDM Fitting Covers  
AEROFLEX® Cel-Link II® Glueless Seam Seals  
AEROFLEX® AEROSEAL Adhesive  
AEROFLEX® AEROSEAL LVOC™ BLACK Adhesive  
AEROFLEX® REF 1520™ Adhesive  
AEROFLEX® AEROCOAT LVOC® Coating  
InnoFoam™ by PTI Polyethylene Tube Insulation (not an AEROFLEX® product)

Aeroflex provides the following factual detail regarding the above-referenced products in support of this certification:

1. The above-referenced products are manufactured in the United States.
2. The above-referenced products are commercially available off-the-shelf (“COTS”) products because they are:
  - a. “Commercial items” as defined in FAR 2.101 because they are customarily used by the general public or non-governmental entities for purposes other than governmental purposes, and have been offered for sale to the general public;
  - b. Sold in substantial quantities in the commercial marketplace; and
  - c. Are offered to the Government, under a contract or subcontract, without modification, in the same form in which they are sold in the commercial marketplace.
3. The above-referenced products are not wholly or predominantly made up of iron or steel or a combination of both.

Based on those facts, Aeroflex hereby certifies that the above-referenced products are “domestic” construction materials or end products, and therefore Buy American compliant, because they are:

1. Not predominantly made up of iron or steel or a combination of both;
2. Manufactured in the United States; and
3. Commercially available off-the-shelf (“COTS”) items.

The above analysis confirming that the products are “domestic” is applicable to clauses including, but not limited to:

1. FAR 52.225-1 Buy American - Supplies
2. FAR 52.225-2 Buy American Certificate
3. FAR 52.225-3 Buy American – Free Trade Agreements – Israeli Trade Act
4. FAR 52.225-4 Buy American – Free Trade Agreements – Israeli Trade Act Certificate
5. FAR 52.225-5 Trade Agreements
6. FAR 52.225-6 Trade Agreements Certificate
7. FAR 52.225-9 Buy American – Construction Materials
8. FAR 52.225-10 Notice of Buy American Requirement – Construction Materials
9. FAR 52.225-11 Buy American – Construction Materials Under Trade Agreements
10. FAR 52.225-12 Notice of Buy American Requirement – Construction Materials Under Trade Agreements
11. FAR 52.225-21 Required Use of American Iron, Steel, and Manufactured Goods - Buy American Statute - Construction Materials.
12. FAR 52.225-22 Notice of Required Use of American Iron, Steel, and Manufactured Goods -Buy American Statute - Construction Materials.
13. FAR 52.225-23 Required Use of American Iron, Steel, and Manufactured Goods - Buy American Statute - Construction Materials Under Trade Agreements.
14. FAR 52.225-24 Notice of Required Use of American Iron, Steel, and Manufactured Goods -Buy American Statute - Construction Materials Under Trade Agreements.
15. Section 1605, 2 CFR §176.70 Policy, of the American Recovery and Reinvestment Act of 2009 (ARRA).

For questions regarding the above analysis, confirmation of Aeroflex’s compliance with any specific Buy American requirement, or FAR clause not addressed directly above, please do not hesitate to contact me.



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Greg Ertel  
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