



# Certificate of Compliance

**Date-** July 26, 2013

**Regulatory/specification requirement-**

The American Recovery and Reinvestment Act of 2009, Section 1605 "Buy American Provision"

**Products affected-** Model HK/HKV Brass Radiant/Hydronic Manifold Sets

**Certification-**

Roth Industries, Inc. hereby certifies that the model HK/HKV Brass Radiant/Hydronic Manifold Sets manufactured at our plant location at 268 Bellew Avenue South, Watertown New York, United States of America comply with section 1605 of ARRA-2009 requirements determining whether substantial transformation has occurred in the U.S.A.

**Roth Industries Inc.-Model HK/HKV Brass Radiant/Hydronic Manifold Sets**

Substantial Transformation Analysis Questions		Yes	No
1	Were all of the components of the manufactured good manufactured in the United States, <b>and</b> were all of the all of the components assembled into the final product in the U.S?		<b>X</b>
	<b>NOTES- All of the componenents were assembled into the final product in the U.S.</b>		
2	Was there a change in character or use of the good in the United	<b>X</b>	
a.	Was there a change in the physical and/or chemical properties or characteristics designed to alter the functionality of the good?		<b>X</b>
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?	<b>X</b>	
c.	Did the manufacturing or processing operation result in the narrowing of the range of possible uses of a multi-use product?	<b>X</b>	
	<b>NOTES-</b>		
3	Was/were the process(es) performed in the U.S. (including but not limited to assembly)complex and meaningful?	<b>X</b>	
a.	Did the process(es) take a substantial amount of time?		<b>X</b>
b.	Was (were) the process(es) costly?	<b>X</b>	
c.	Did the process(es) require particular high level skill?	<b>X</b>	
d.	Did the process(es) require a number of different operations?	<b>X</b>	
e.	Was substantial value added in the process(es)	<b>X</b>	
	<b>NOTES-</b>		

Please address any questions regarding this certificate of compliance to the Technical Department at the address below.