



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 X-PERT-S5 Five-Layer PE-RT Radiant/Hydronic Tubing

Certification-

Roth Industries, Inc. hereby certifies that X-PERT-S5 Five-Layer PE-RT Tubing manufactured for Roth under contract by Oil Creek Plastics, Inc. 45619 State Highway 27, Titusville, Pennsylvania 16354, United States of America, complies with section 1605 of ARRA-2009 requirements determining whether substantial transformation has occurred in the U.S.A.

Roth Industries, Inc.-X-PERT-S5 Five-Layer PE-RT Tubing for Radiant/Hydronic Use

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

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