

CONDUCTING PRE-AWARD AND POST-DELIVERY AUDITS FOR ROLLING STOCK PROCUREMENTS

Best practices handbook for recipients, auditors, manufacturers, and suppliers.

FEDERAL TRANSIT ADMINISTRATION
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DEDICATED

.....to our cherished colleague, John G. Bell, who contributed his expertise, untiring resolve, and boundless passion about Buy America to the development of this Handbook.

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Foreword

The information contained in this handbook is based on the 49 CFR Part 663 Pre-Award and Post-Delivery Audits of Rolling Stock Purchases and 49 CFR Part 661 Buy America Requirements.

The guidance in this handbook does not constitute a determination of compliance with the Department of Transportation (DOT) standards and rules or with your rights or responsibilities under the rules and is not binding on the DOT.

This is a best practices handbook (a non-binding guidance document) for use by auditors as well as grantees, vendors, and interested members of the public.

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1. Introduction

The Federal Transit Administration's (FTA) objective in implementing 49 CFR Part 661 Buy America Requirements and 49 CFR Part 663 - Pre-Award and Post-Delivery Audits of Rolling Stock Purchases is to support U.S. jobs and the U.S. manufacturing industry.¹

As part of the federal grant application for any revenue service rolling stock grant, agencies that use federal funds (recipients) to procure vehicles "must certify to FTA that it will conduct or cause to be conducted pre-award and post-delivery audits" as prescribed by 49 CFR Part 663. By signing the FTA Master Agreement, recipients have certified that they will conduct or cause to be conducted the requisite pre-award and post-delivery audits. However, 49 CFR Part 663 imposes additional requirements on recipients in terms of ensuring and documenting that the rolling stock to be purchased (pre-award audit) and the rolling stock received (post-delivery audit) comply with FTA's Buy America requirements.²

The purpose of this handbook is to assist recipients, auditors, rolling stock manufacturers (manufacturers), and subcontractors and suppliers (suppliers) in understanding and correctly applying FTA's pre-award and post-delivery audit requirements for rolling stock vehicle (vehicle) purchases.

The overall aim is to guide handbook users through the necessary steps to meet the pre-award audit and post-delivery audit requirements as well as to bring greater uniformity to the way the industry conducts and documents pre-award and post-delivery audits of rolling stock purchases.

¹ These requirements are distinct from the Buy American Act of 1933, which governs procurements made directly by the Federal government.

² See 49 CFR §§ 663.7, 663.21–27, 663.31–39.

1.1. Scope

FTA generally defines rolling stock in the Buy America regulations to include transit vehicles such as buses, vans, cars, railcars, locomotives, trolley cars and buses, ferryboats, and vehicles used for guideways and incline planes.³

The handbook describes approaches and recommends processes for recipients to consider in preparing to conduct pre-award and post-delivery vehicle audits from the solicitation phase through the final acceptance of vehicles. The handbook also includes examples of how to calculate domestic content, and verify and document compliance for all participating parties. The handbook is designed as a reference tool and a guide that includes recommendations on auditing and compliance topics. It also provides examples as well as sample forms and templates.

In 1995, FTA published two separate handbooks on this subject, one for rail vehicles and one for buses. This handbook replaces both of those documents and addresses rail and bus vehicles in a single handbook.

Information in this handbook is subordinate to the regulations in 49 CFR Part 661 - Buy America Requirements and 49 CFR Part 663 - Pre-Award and Post-Delivery Audits of Rolling Stock Purchases.

Recipients, auditors, manufacturers, and suppliers should all be familiar with the most current revision of both 49 CFR Parts 661 and 663.⁴ It is important to keep current on FTA guidance and final rules affecting these regulations as published in the *Federal Register* or on the FTA website. The FTA website has links to the regulations, all relevant Federal Register publications, waivers, and letters of interpretation, frequently asked questions, this vehicle handbook, and related Dear Colleague letters.

In case of a conflict between the contents of this handbook and FTA's Buy America regulations and rulings, the regulations and rulings shall take precedence.

³ FTA also defines rolling stock end products as off-vehicle train control, communication, and traction power equipment. See, e.g., Appendix A to 49 CFR § 661.3. This handbook's guidance is limited to vehicles and does not address Buy America compliance for rolling stock end products (e.g., off-vehicle elements such as train control, communication, and traction power equipment) described in Buy America regulations in 49 CFR § 661.11 (t) through (w).

⁴ The regulations can be found online on the FTA "Buy America" webpage in the "Regulations" Section.

1.2. Background

FTA's Buy America requirements apply to third-party procurements by FTA grant recipients. The first Buy America provision was included in the Surface Transportation Assistance Act and is currently codified at 49 U.S.C. 5323(j) and implemented under 49 CFR Part 661.⁵ This provision prohibits FTA from obligating funds for a project unless the steel, iron, and manufactured products used in the project are produced in the United States. Recipients are required to conduct Pre-Award and Post-Delivery audits under 49 U.S.C. 5323(m), as implemented by 49 CFR Part 663.

As a condition to receiving FTA grant funds, recipients must certify compliance with Buy America and the pre-award and post-delivery audit requirements. The recipient must either verify that the vehicles will contain **more than 60 percent domestic content**, by cost, **and final assembly of the vehicles will take place in the United States** in accordance with 49 CFR § 661.11,⁶ or obtain a FTA waiver letter exempting the vehicle procurement from Buy America requirements. At each phase in the vehicle procurement cycle, there are specific actions that a recipient should take to ensure compliance with 49 CFR Part 661 Buy America Requirements and 49 CFR Part 663 - Pre-Award and Post-Delivery Audits of Rolling Stock Purchases.

Recipients purchasing vehicles must ensure that a pre-award audit as described in 49 CFR §§ 663.21 – 27 is completed **before the recipient enters into a formal contract** to purchase vehicles. Similarly, those recipients purchasing vehicles must also ensure that a post-delivery audit as prescribed in 49 CFR §§ 663.31 – 39 is completed **before the title to the vehicle is transferred** to the recipient. In 1995, FTA published two separate handbooks on this subject, one for rail vehicles, and one for buses.

Recently, comments and questions from FTA Grantees, Project Management Oversight Contractors (PMOCs), and Vendors regarding the clarity of the Buy America Regulations, and the proper processes needed to verify compliance with those regulations resulted in the development of this revised handbook.

⁵ 49 U.S.C. 5323(j) (formerly sec.165 of the Surface Transportation Assistance Act of 1982 (Pub. L. 97–424); as amended by sec. 337, Pub. L. 100–17; sec. 1048, Pub. L. 102–240; sec. 3020(b), Pub. L. 105–178; and sec.3023(i) and (k), Pub. L. 109–59); 49 C.F.R. 1.51.

⁶ Note that the general Buy America requirements for manufactured products in 49 CFR § 661.5 requiring 100% U.S. steel/iron and 100% of components to be manufactured in the United States are separate and apart from the 49 CFR § 661.11 requirements for rolling stock. Therefore, the structural steel requirements in 661.5 do not apply to the vehicular steel used in rolling stock, as noted in section 661.5(c).

1.3. Organization of Handbook

This handbook is divided into five major sections addressing the following areas:

- [Section One – Introduction](#)
- [Section Two – Pre-Award Audit](#)
- [Section Three – Post-Delivery Audit](#)
- [Section Four – Domestic Content Calculations](#)
- [Section Five – Frequently Asked Questions](#)
- [Appendices](#)

Each major section presents guidance to recipients, auditors, manufacturers, and component/subcomponent suppliers.

A brief overview of each section of the handbook is provided below.

Section 1

Introduction describes the objectives, purpose, and scope of the handbook, background, definitions, relevant references, and acronyms.

Section 2

Pre-Award Audit recommends processes to the recipient for conducting effective pre-award audits. It includes general guidance on best practices during the vehicle solicitation (i.e., source selection and contract award), and contract execution phases to facilitate verification of compliance. It also seeks to clarify requirements and provide guidance to manufacturers and their suppliers about how to prepare documentation to satisfy pre-award requirements.

Section 3

Post-Delivery Audit provides recommended post-delivery audit processes, including a discussion about intermediate audits. It intends to clarify the post-delivery requirements of 49 CFR Parts 661 and 663. It includes guidance to assist recipients, auditors, vehicle manufacturers, and suppliers with various aspects of the post-delivery audits. It also describes what information is needed to substantiate compliance.

Section 4

Domestic Content Calculations provides guidance and clarification on methods used to correctly calculate domestic content. This section discusses the distinctions in the treatment of domestic content for components and subcomponents and offers clarification on how to determine what a component versus a subcomponent is. It explains how one should derive the total material cost (TMC).

Section 5

Frequently Asked Questions (FAQs) provides FTA responses to FAQs concerning the pre-award and post-delivery audits of rolling stock purchases. The responses also incorporate lessons learned from FTA Project Management Oversight Contractor's (PMOC's) oversight of federally funded projects.

Appendices

Appendices include templates for domestic content calculations worksheets, process checklists, sample certification forms, Buy America waiver references, and sample Buy America audit reports.

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1.4. References

The principal references for FTA's Pre-Award and Post-Delivery Audit and Buy America regulations are:

United States Code

49 U.S.C. Chapter 53, Section 5323(j)

49 U.S.C. Chapter 53, Section 5323(m)

Legislation

Surface Transportation Assistance Act of 1978, Pub. L. 95-599

Surface Transportation Assistance Act of 1982, Pub. L. 97-424

Surface Transportation and Uniform Relocation Assistance Act of 1987, Pub. L. 100-17

Buy America Act of 1988, Pub. L. 100-418

The Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users, or SAFETEA-LU, Pub. L. 109-59

The Moving Ahead for Progress in the 21st Century Act, or MAP-21, Pub. L. 112-141

Regulations

Buy America Requirements, 49 CFR Part 661

Pre-Award and Post-Delivery Audits, 49 CFR Part 663

Federal Acquisition Regulation; Foreign Acquisition, Exempted Articles, Materials and Supplies, 48 CFR Part 25

1.5. Definitions

The definitions below are provided to assist the reader with terms used in the manual. Definitions from the Pre-Award and Post-Delivery Audits of Rolling Stock Purchases Rule (49 CFR § 663.5) and the Buy America Requirements Rule (49 CFR § 661.3) are identified in italics. Non-italicized definitions are provided for clarification to assist the reader in correctly implementing the requirements.

Audit:	<i>A review resulting in a report containing the necessary certifications of compliance with Buy America standards, purchaser's requirements specifications, and, where appropriate, a manufacturer's certification of compliance with or inapplicability of the Federal Motor Vehicle Safety Standards.</i>
Auditor:	Person or persons who verify Buy America compliance and prepare pre-award and post-delivery reports. Pre-award and post-delivery audits may be performed directly by recipient staff or by qualified independent auditors.
Component:	<i>Any article, material, or supply, whether manufactured or unmanufactured, that is directly incorporated into the end product at the final assembly location (§ 661.3 Definitions). Appendices B and C to § 661.11 provide lists of typical components of buses and rail rolling stock, respectively. Section 4.2 of this handbook provides additional information on this definition.</i>
End product:	<i>Any vehicle, structure, product, article, material, supply, or system, which directly incorporates constituent components at the final assembly location, that is acquired for public use under a federally-funded third-party contract, and which is ready to provide its intended end function or use without any further manufacturing or assembly change(s). A list of representative end products is included in Appendix A to 49 CFR Part § 661.3 End Products.</i>
Final assembly:	The creation of the end product from individual elements brought together for that purpose through the application of manufacturing processes. Minimum final assembly requirements are described in Appendix D to § 661.11.
FMVSS:	Federal Motor Vehicle Safety Standards issued by the National Highway Traffic Safety Administration under 49 CFR Part 571.
Manufactured product:	<i>An item produced as a result of the manufacturing process (§ 661.3 Definitions).</i>

Manufacturing process:	<i>The application of processes to alter the form or function of materials or of elements of the product in a manner adding value and transforming those materials or elements so that they represent a new end product functionally different from that which would result from mere assembly of the elements or materials (§ 661.3 Definitions).</i>
Post-delivery:	<i>The time period in the procurement process from when the rolling stock is delivered to the recipient until title to the rolling stock is transferred to the recipient or the rolling stock is put into revenue service, whichever is first (§ 663.5 Definitions).</i>
Pre-award:	<i>That period in the procurement process before the recipient enters into a formal contract with the supplier (§ 663.5 Definitions).</i>
Recipient:	<i>Any entity that is a recipient of Federal financial assistance from FTA (§ 663.5 Definitions). For purposes of this handbook, “recipient” is synonymous with the term “Grantee” as defined in § 661.3 Definitions.</i>
Rolling stock	<i>Transit vehicles such as buses, vans, cars, vehicles, locomotives, trolley cars and vehicles, ferry boats, and vehicles used for guideways and incline planes (§ 663.5 Definitions).⁷</i>
Subcomponent:	<i>Any article, material, or supply, whether manufactured or unmanufactured, that is one step removed from a component in the manufacturing process and that is incorporated directly into a component, except for raw materials produced in the United States and then exported for incorporation into a component.</i>
Supplier:	<i>Any entity that provides either components or subcomponents, which are incorporated into the vehicle either as part of the manufacturing process or during final assembly.</i>
United States:	<i>The several States, the Commonwealth of Puerto Rico, the District of Columbia, Guam, American Samoa, the U.S. Virgin Islands, and the Commonwealth of the Northern Mariana Islands (§ 661.3 Definitions)</i>

⁷ Note that § 661.3 defines rolling stock to include vehicles used for support services. However, pre-award and post-delivery audit requirements do not apply to vehicles used for support services.

1.6. Acronyms

BOM	Bill of Materials
CFR	Code of Federal Regulations
DOT	Department of Transportation
DTE	Diagnostic and Test Equipment
FAQ	Frequently Asked Question
FOIA	Freedom of Information Act
FMVSS	Federal Motor Vehicle Safety Standards
FTA	Federal Transit Administration
MAP-21	Moving Ahead for Progress in the 21 st Century
MU	Mark-up
NDE	Non-Destructive Examination
NRE	Non-Recurring Expenses
OEM	Original Equipment Manufacturer
PDC	Percent Domestic Content
QA/QC	Quality Assurance/Quality Control
PMOC	Project Management Oversight Contractor
PO	Purchase Order
SAFETEA-LU	The Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users
STAA	The Surface Transportation Assistance Act of 1982
STURAA	Surface Transportation and Uniform Relocation Assistance Act of 1987
TDMC	Total Domestic Material Cost
TMC	Total Material Cost
TVMC	Total Vehicle Material Costs
U.S.	United States of America
U.S.C.	United States Code

2. Pre-Award Audit

A recipient purchasing revenue service rolling stock with FTA funds must ensure that a pre-award audit under this part is complete before the recipient enters into a formal contract for the purchase of such rolling stock. 49 CFR § 663.21.

The Pre-Award Audit includes making and obtaining required certifications and reviewing the documentation provided by the manufacturer in support of its certification.

This section addresses the requirements for a pre-award audit conducted pursuant to the Pre-Award and Post-Delivery Audits of Rolling Stock Purchases regulations.⁸ This section also provides some best practices for the recipient, auditor, or manufacturer or supplier, when conducting or participating in a pre-award audit. While FTA does not require the use of these best practices, it encourages all parties to adopt such procedures and processes to the extent they will help achieve compliance. Sample forms and certifications are provided in the appendices.

⁸ 49 CFR Part 663.

2.1. Requirements for the Pre-Award Audit

Recipients of federal financial assistance purchasing rolling stock must complete a pre-award audit before entering into a formal contract with a manufacturer. Recipients may perform the audit processes using internal staff or hire third-party auditors to carry out all or some of the review functions on the recipient's behalf. In either case, the auditor(s) conducting the pre-award audit should be qualified and independent from the procurement process, the manufacturer, and the manufacturer's agents.

[Appendix B.2](#) provides useful pre-award checklists.

There are three certifications that must be included by the Recipient in the pre-award audit:

- **Pre-Award Buy America Certification or Pre-Award Buy America Exemption Certification**
 - **Note: to complete this Certification the Recipient must have received the Manufacturer's Certification of Compliance or Non-Compliance with Buy America Rolling Stock Requirements per 49 CFR 661.12**
- **Pre-Award Purchaser's Requirements Certification, and**
- **Pre-Award Certification of Compliance with or Inapplicability of Federal Motor Vehicle Safety Standards (FMVSS).**

Table 1 illustrates who is responsible for the certifications.

Table 1. Pre-Award Audit Certification Responsibilities

	Recipient	Manufacturer
SOLICITATION		
Pre-Award Buy America Certification	✓	
Pre-Award Buy America Exemption Certification (if applicable)	✓	
Certification of Compliance or Non-Compliance with Buy America Rolling Stock Requirements (49 CFR 661.12)		✓
Pre-Award Purchaser's Requirements Certification	✓	
Pre-Award FMVSS Compliance Certification	✓	
Pre-Award Certification of FMVSS Inapplicability	✓	

The recipient is responsible for obtaining the Pre-award Buy America Certification, Purchaser's Requirement Certification, and the FMVSS Certification (if applicable) or the Pre-Award Certification of FMVSS Inapplicability. In order for the recipient to certify Buy America compliance or that it received a Buy America waiver, the recipient must obtain and keep on file the bidder's or the offeror's (the manufacturer or supplier) Certification of Compliance (or Non-Compliance) with Buy America Rolling Stock Requirements.⁹

A component supplier may be required to submit a Certification of Compliance (or Non-Compliance) with Buy America Rolling Stock Requirements if it is contracting directly with the recipient. When the component supplier is a contractor for the rolling stock manufacturer, *i.e.*, a subcontractor for the recipient, the recipient or manufacturer may request that a component supplier provide this certification if it will further compliance with the pre-award audit requirements.

⁹ See 49 CFR § 663.25 and 49 CFR § 661.12.

2.2. Pre-Award Buy America Certification

This subsection describes the **Pre-Award Buy America Certification** requirements and recommends best practices to facilitate compliance with the pre-award audit requirements.

2.2.1. Recipient's Pre-Award Buy America Certification Requirements

The recipient must keep on file a **Pre-Award Buy America Certification** that certifies that:

- There is a letter from FTA granting a waiver from the Buy America requirements for the vehicle procurement, or
- The recipient is satisfied that the rolling stock to be purchased meets the Buy America requirements:
 - (1) The cost of the components produced in the United States is more than 60 percent of the cost of all components, and
 - (2) Final assembly takes place in the United States.¹⁰

In determining whether the rolling stock to be purchased meets the Buy America requirements, the recipient must review itself—or by means of an audit prepared by someone other than the manufacturer or its agent—documentation provided by the manufacturer, which lists the following:

- (1) Component and subcomponent parts of the rolling stock to be purchased, including, for each component and subcomponent:
 - (a) The manufacturer,
 - (b) The country of origin, and
 - (c) The cost, and
- (2) The final assembly location, including:
 - (a) A description of the activities that will take place at the final assembly location, and
 - (b) The cost of the final assembly activities.¹¹

[Section 2.2.2 Documentation for Buy America Certification at Pre-Award](#) below describes the supporting documentation that the recipient must review to support its pre-award Buy America certification pursuant to 49 CFR § 663.25(b).

If FTA grants a Buy America waiver for only one or more components or subcomponents of the vehicle procurement, but does not waive all of the requirements under Buy America, then the Recipient must review the manufacturer's documentation and satisfy itself that the manufacturer's documentation, together with the FTA-granted waiver, is sufficient to meet the Buy America requirements.

¹⁰ 49 U.S.C. § 5323(j)(2)(3); 49 CFR § 661.11(a).

¹¹ 49 CFR § 663.25.

If a manufacturer cannot comply with Buy America requirements and elects to certify non-compliance, the manufacturer may qualify for a waiver (as discussed in [Subsection 2.2.1.1](#)).

2.2.1.1. Buy America Waivers

At its discretion, FTA may grant a waiver of the Buy America requirements under the following circumstances:

- (1) Public Interest Waiver: FTA determines that applying the requirements would be inconsistent with the public interest,
- (2) Non-availability Waiver: FTA finds that an item is not produced in the United States in sufficient and reasonably available quantities or is not of a satisfactory quality, or
- (3) Price Differential Waiver: FTA finds that including domestic material will increase the cost of the overall project by more than 25 percent.¹²

The recipient, manufacturer, and supplier may request a public interest waiver and a non-availability waiver (requests from manufacturers or suppliers are limited to components or subcomponents). Only the recipient may request a price differential waiver.¹³ The waiver request must be timely, i.e., prior to contract award.¹⁴

If FTA grants a Buy America waiver, the recipient must:

- Complete a Pre-Award Buy America Exemption Certification (see [Appendix C.3](#) for sample certification); and
- Keep the Pre-Award Buy America Exemption Certification on file for future FTA reviews.

2.2.2. Documentation for Pre-Award Buy America Certification (Pre-Award Audit Report)

A recipient's Pre-Award Audit Report should summarize the process the recipient has used to verify the proposed manufacturer's compliance with the Buy America requirements.

The recipient should create and maintain a file for FTA reviews that includes:

- A copy of the Pre-Award Audit Report, including:
 - The recipient's Pre-Award Buy America Certification;
 - The manufacturer or supplier's documentation, including:
 - The manufacturer's certificate of compliance or non-compliance with Buy America rolling stock requirements (see Appendices [C.1](#) and [C.2](#) for certification templates).

¹² 49 U.S.C. § 5323(j)(2)(A), (B), and (D); 49 § CFR 661.7.

¹³ 49 CFR § 661.9(c)-(d).

¹⁴ 49 CFR § 661.9(b). FTA generally requires that waiver requests be made prior to contract award. Under very limited circumstances, however, FTA will consider a post-contract award non-availability waiver request. 49 CFR § 661.7(c)(3).

- A list of vehicle components and subcomponents (domestic content worksheet) by manufacturer or supplier, their country of origin, and costs either as a dollar figure or percentage (see [Appendix A for example domestic content calculation worksheets](#));
- The proposed final assembly site location;
- A description of activities that will take place at final assembly;¹⁵ and
- The total proposed cost of final assembly.

A sample Pre-Award Audit Report is included in [Appendix D.1](#).

A recipient, or an auditor acting on the recipient's behalf, must review the supporting actual cost documents in order to verify the estimated domestic content, especially if the manufacturer provides such domestic content only as a percentage. Manufacturers may provide estimated domestic content by cost either in dollar figures or as percentages. Therefore, auditors must ensure that the manufacturer's pre-award audit documentation supports all costs used in developing the domestic content list (worksheet) and should request additional information necessary in order to ensure and certify compliance with Buy America. In the absence of purchase orders or supplier quotes, this verification may be based on, among other things, estimates or other sources used in developing the bid.

2.2.3. Best Practices for Pre-Award Buy America Certifications

This subsection describes best practices to aid recipients, auditors, manufacturers, and suppliers in achieving compliance with the **Pre-Award Buy America Certification** requirements.

Recommended processes and special considerations are described beginning with key steps that recipients should take early in the solicitation process, as well as processes to verify compliance with domestic content and U.S. final assembly requirements.

Throughout the vehicle procurement process recipients should be alert to conditions that could pose challenges for Buy America compliance. Examples of these conditions include:

- Manufacturers who are inexperienced with the U.S. market and regulations.
- A new major subcontractor/component supplier.
- Vehicles with the domestic content close to the 60 percent minimum threshold.
- Major components with the domestic content close to the 60 percent minimum threshold.
- Manufacturers creating new U.S. final assembly facilities.
- Engineering changes, field modifications or contract change orders causing changes in project scope (completed projects must comply with Buy America requirements after all change orders have been implemented for all vehicles).

Recipients may and will often adopt practices to lessen the risks of non-compliance. First, while apparent to many, it is important to clearly define and communicate the recipients' processes and expectations about verifying compliance to manufacturers throughout the procurement and

¹⁵ Appendix D to 49 CFR § 661.11—Minimum Requirements for Final Assembly.

production periods. Another useful tool that recipients may use is intermediate audits (see Section 3.3 Best Practices for Post-Delivery Audits for discussion about intermediate audits). Some recipients also consider requiring that vehicles have domestic content percentages even greater than the required 60 percent for vehicles and/or components to prevent inadvertent noncompliance with Federal requirements. Recipients may also provide incentives for bidders to increase domestic content as long as those incentives are consistent with Federal and local law.

The following are some recommended best practices for the pre-award audit stage:

2.2.3.1 Solicitation Phase

As the pre-award audit must be completed prior to the recipient entering into a formal contract with a manufacturer or supplier, there are several steps that the recipient may take during the procurement process to help ensure Buy America compliance.

Table 2. Recommended Discussion Topics During the Solicitation Phase of the Procurement.

Recommended Discussion Topics During the Solicitation Phase of the Procurement
Buy America requirements, e.g., manufacturer's certification, etc.
Recipient & Manufacturer or Supplier's (Bidder or Offeror) monitoring responsibilities of the status of compliance during production (e.g., the Resident Inspector program).
Recipient's processes for conducting Pre-Award, Intermediate and Post-Delivery Audit reviews.
Manufacturer's procedures for collecting, reviewing, and maintaining supporting documentation.
Recipient's role for collecting, reviewing, and maintaining supporting documentation.
Recipient's procedures for managing requests for waivers from Buy America requirements.
Recipient's process for selecting a Buy America auditor.

The pre-proposal conference is a good opportunity for recipients to highlight important Buy America requirements and identify specific Buy America related documentation that manufacturers should include in their bids. For example, recipients may want to emphasize that in a competitive sealed procurement, a bidder must submit a signed

certification with the bid. If a bidder submits the wrong certification, or certifies both compliance and non-compliance, the bid generally will be deemed non-responsive.¹⁶

Also during the solicitation period, recipients should communicate to manufacturers their expectations for periodic status reporting on Buy America compliance from the manufacturer(s), including if there are any changes to Buy America content or final assembly that may occur during vehicle production due to modifications or substitutes of component or subcomponent suppliers. Periodic reporting helps prevent post-delivery surprises in shifts in domestic content and potential issues regarding compliance. For reference, a Proposal Compliance Checklist can be found in [Appendix B.1](#).

2.2.3.2. Verifying Domestic Content Compliance

Preparing and verifying domestic content compliance is a key element of the pre-award audit process. Errors and misinterpretations during the calculation process can undermine the overall domestic content percentage and jeopardize the vehicle's compliance with Buy America requirements. Please see [Section 4, Domestic Content Calculations](#), for detailed instructions on calculating domestic content.

2.2.3.2.1. Components with Close To 60 Percent U.S. Subcomponents

While conducting a pre-award audit, auditors should pay close attention to components with the highest dollar or percentage values. If a major component's domestic content falls below the minimum threshold at any point during the production cycle, it could reduce the entire vehicle's domestic content percentage and potentially cause the entire vehicle to fall out of compliance. Therefore, major components with domestic content percentages that are close to the 60 percent minimum domestic content threshold should be noted and followed up with during and at the end of the production cycle.

Similarly, when reviewing the manufacturer's pre-award documentation, auditors should also pay particular attention to vehicles that are expected to have a total domestic content that is close to the 60 percent minimum domestic content threshold. Subsequent change orders or errors in the calculations or documentation (even to smaller value components) could potentially alter the total domestic content below and result in noncompliance.

In addition, specific circumstances may warrant a more in-depth review of a component supplier to ensure compliance. In those instances, the auditor may need to conduct additional research on the supplier and its product.¹⁷

¹⁶ 49 CFR § 661.13(b).

¹⁷ This may include one or more site visits to the supplier's facility, but the recipient should determine the necessity of such a site visit in light of the circumstances.

2.2.3.2.2. Reasonableness of Component and Subcomponent Costs

One method to confirm the reasonableness of the component and subcomponent costs, especially if other data is lacking,¹⁸ is to compare costs for components and subcomponents listed on the manufacturer's domestic content worksheet to comparable vehicle procurement costs. Recent Buy America-compliant procurements of similar vehicle types and quantities can serve as useful benchmarks. Such confirmation prevents over or undervaluing of an item in order to meet the 60 percent minimum domestic content threshold. It also may prevent final assembly costs from being included in the domestic content by cost calculations.

2.2.3.3. Verifying United States (U.S.) Final Assembly

Another essential step in the pre-award audit process is to verify that the proposed procurement would comply with the U.S. final assembly requirements. In order to verify that the proposed final assembly activities comply with Buy America requirements, the recipient must review documentation provided by the manufacturer to determine whether the manufacturer's planned final assembly activities in the United States are adequate to meet the requirements of 49 CFR § 661.11 and Appendix D to 661.11 (required documentation is discussed in Section [2.2.2](#)).

The specific scope of final assembly activities may vary from manufacturer to manufacturer and even from vehicle to vehicle. Therefore, in order to verify compliance as necessary, the auditor may perform due diligence through a variety of methods, including, among other things:

- Reviewing:
 - The manufacturer's flow chart(s) or detailed drawing(s) of the production work station,
 - The manufacturer's work instructions,
 - The manufacturing plans, and
 - The assembly drawings (usually kept or posted on a production (shop) floor).
- Conducting QC/QA inspections¹⁹ (hold points).

Final assembly costs must also include the proposed direct labor associated with the U.S. final assembly production line. For the pre-award audit, costs may be established from the manufacturer's estimate of hours, subcontractors' labor quotes, and actual

¹⁸ If the manufacturer declines to provide supporting documentation for component and subcomponent costs and the auditor is unable to determine the reasonableness of the listed costs, then the auditor should include this in the pre-award audit report.

¹⁹ This may take the form of a site visit. The recipient should determine whether it should conduct a site visit to the proposed final assembly location in light of all of the surrounding circumstances.

costs from similar projects. Auditors should collect as much information as needed to determine whether the final assembly costs are reasonable.

2.2.3.4. Supplier Buy America Certificate at Pre-Award

The manufacturer is responsible for ensuring that suppliers and subcontractors comply with Buy America requirements. As a best practice, manufacturers should require all of its suppliers for the vehicle procurement to provide sufficient documentation to demonstrate compliance with pre-award audit requirements. This may require some additional follow-up with, or a request for additional information from, the supplier.²⁰

It is also recommended, but not required, that manufacturers obtain executed (signed and dated) certifications from all its suppliers for the pre-award audit. A suggested template that captures relevant information is discussed in Section 4.5 and a sample is provided in [Appendix C.5, “Sample Supplier Buy America Certification.”](#)

In order to certify compliance, manufacturers and suppliers must be knowledgeable about the correct method of calculating a component’s percentage of domestic content. [Section 4, “Domestic Content Calculations,”](#) provides detailed instructions for calculating domestic content.

²⁰ While not required, to ensure compliance with the pre-award audit and Buy America requirements, the manufacturer may consider conducting supplier qualification reviews (e.g., via site visits), detailed reviews of supplier documents, first article inspections, qualification testing, and source/pre-shipment inspections to verify suppliers’ certifications.

2.3. Pre-Award Purchaser's Requirements Certification

This subsection describes the process that Recipients should follow in order to demonstrate compliance with the **Pre-Award Purchaser's Requirements** as part of the pre-award audit.

A recipient of Federal financial assistance purchasing revenue service vehicles **must** certify pre-award that:

- (1) The rolling stock it is purchasing is the same product described in its solicitation specification, and
- (2) The proposed manufacturer is a responsible manufacturer with the capability to produce a vehicle that meets the recipient's specification (Purchaser's Requirements). (See Appendices [C.1](#) and [C.2](#) for certification templates).²¹

2.3.1. Documentation for Purchaser's Requirements Certification at Pre-Award

Once the recipient is satisfied the Purchaser's Requirements have been met, they **must**:

- Complete a **Pre-Award Purchaser's Requirements Certification** (See [Appendix C.4](#) for a sample certification); and
- File the **Pre-Award Purchaser's Requirements Certification** for future FTA reviews.

2.3.2. Best Practices for Purchaser's Requirements Certification at Pre-Award

Various approaches can be used to verify and document compliance for the **Pre-Award Purchaser's Requirements Certification**. Typically, the recipient's bid or proposal evaluation team assesses whether the proposed manufacturer's bid complies with the solicitation specification and whether the manufacturer is responsible and has the capacity and capability to produce a vehicle the meets the solicitation specification. FTA considers this a reasonable method for verifying compliance under the rule for purchaser's requirements.

2.3.2.1. Verifying Compliance with Solicitation Specifications

To verify that the proposed manufacturer's bid complies with the recipient's specification, the recipient should compare the solicitation specification for the vehicle with the proposed manufacturer's technical bid. A manufacturer's technical information can include the manufacturer's bid proposal, specifications, product brochures, technical data sheets, bills of material, drawings, etc.

²¹ 49 C.F.R. § 663.27.

2.3.2.2. Verifying Manufacturer Capability and Capacity

Recipients must assess a proposed manufacturer's capacity and capability to produce the specific vehicles. Typically, this assessment is also completed as part of the recipient's evaluation of the proposed manufacturer's bid. The scope and depth of the assessment will vary depending on the size and complexity of the procurement and the past performance of the manufacturer.

Recipients may want to review the following information, if available, from the proposed manufacturer as part of the pre-award audit:

- Past performance on previous vehicle orders;
- Qualifications of key personnel;
- Facility layouts/drawings, production line layout/flowchart;
- Plant output capacity (i.e., max. production rate per week);
- Staffing counts by craft;
- Readiness of fixtures for carbody construction;
- Quality assurance and control plan; and
- Other items necessary to execute the work.

If a recipient does not find that the information provided in the bid or offer is sufficient to determine whether the manufacturer is able to comply with the purchaser's requirements, then the recipient should ask the manufacturer to provide additional information. This includes information regarding the ability to meet the required schedule. Such schedule documentation may include mobilization plans, lease commitments, letters of intent, etc.

If a recipient identifies concerns, it should request that the manufacturer evaluate and, if necessary, implement remedial measures, such as engaging additional production line(s), and subcontracting labor.

Additionally, recipients should verify a proposed manufacturer's financial viability as part of the review to certify compliance with the pre-award purchaser's requirements. At a minimum, recipients should review the proposed manufacturer's public financial statements (if available).

2.4. Pre-Award Federal Motor Vehicle Safety Standards (FMVSS) Certification of Compliance or Inapplicability

The **Pre-Award FMVSS Certification** is a requirement for most, if not all, motor vehicle procurements.²²

This subsection addresses FMVSS certification requirements as part of the pre-award audit. The National Highway Traffic Safety Administration has a legislative mandate under Title 49 U.S.C., Chapter 301, Motor Vehicle Safety, to issue FMVSS regulations. These Federal safety standards are the minimum safety performance requirements for motor vehicles.

2.4.1. FMVSS Compliant Vehicles

Recipients purchasing motor vehicles, such as buses, **must** demonstrate that the vehicles comply with FMVSS as one of the elements of the pre-award audit. To do this, recipients **must**:

- Obtain the FMVSS self-certification (sticker) information from the motor vehicle manufacturer; and
- Complete a **Pre-Award FMVSS Compliance Certification** (see [Appendix C.6](#) for a sample certification).²³

Recipients should keep the manufacturer's Pre-Award FMVSS self-certification information with its **Pre-Award FMVSS Compliance Certification** in its file.²⁴

²² See § 2.4.2. *infra* for additional information on when the FMVSS Certification requirements are inapplicable to motor vehicles.

²³ 49 CFR § 661.41.

²⁴ 49 CFR §§ 661.41, 661.43(a).

2.4.2. Pre-Award Certification of FMVSS Inapplicability

There are certain instances when motor vehicles are not subject to FMVSS. Consider, for example, 49 CFR § 571.7 (Applicability of FMVSS Regulation) and 49 CFR Part 555 (Temporary Exemptions from Motor Vehicle Safety Standards). In such cases, recipients **must** keep on file certification that the motor vehicles to be purchased are not subject to FMVSS.

If the motor vehicles to be purchased are not subject to FMVSS, the recipient **must**:

- Obtain the manufacturer's certified statement that the motor vehicles that the recipient is purchasing are not subject to FMVSS; and
- Complete a **Pre-Award Certification of FMVSS Inapplicability** (see [Appendix C.7](#) for a sample certification).²⁵

Recipients should keep the manufacturer's Pre-Award FMVSS exemption statement with the Pre-Award Certification of FMVSS Inapplicability in its file.

²⁵ 49 CFR § 663.43.

3. Post-Delivery Audit

A recipient purchasing revenue service rolling stock with FTA funds must ensure that a post-delivery audit under this part is complete before title to the rolling stock is transferred to the recipient. 49 CFR § 663.31.

This section describes the processes, certifications, and documentation required to validate the post-delivery audit. [Appendix B.3](#) provides useful post-delivery checklists.

This section also provides best practices and sample forms and certifications to assist in complying with the regulations.

The post-delivery audit is similar to the pre-award audit and follows the same multi-step process as the pre-award audit described in [Section 2](#). In the post-delivery audit, however, recipients verify that the manufacturer complied with applicable Buy America requirements in the production of the rolling stock and this verification therefore must be based on actual data rather than plans and proposals. The conclusions of this review are captured in a Post-Delivery Audit Report.

During post-delivery, recipients continue to have the ultimate responsibility for ensuring compliance with all Federal requirements. As discussed in Section 2, Buy America requirements flow down from the FTA recipients to the manufacturers through the contract documents.

The manufacturer has the responsibility to document the domestic content and the responsibility to maintain documentation that demonstrates compliance with Buy America regulations.²⁶

Post-delivery, a manufacturer certifies that the requirements of the Buy America provisions were satisfied for the total vehicle(s) and all of its components, which includes collecting and evaluating its suppliers' documentation. The manufacturer should ensure that the **Supplier Buy America Certificates** (See [Appendix C.5](#)) are valid and be ready to provide auditors the supplier information necessary to demonstrate compliance.

Because all parties have a responsibility to ensure compliance by verifying domestic content percentages and domestic manufacturing locations, manufacturers should communicate Buy America requirements to their component suppliers and expect suppliers to perform due diligence of their subcomponent suppliers.

²⁶ 49 CFR § 661.15(d).

3.1. Requirements for the Post-Delivery Audit

The post-delivery audit period is the “time period in the procurement process from when the rolling stock” (first vehicle) “is delivered to the recipient until title to the rolling stock” (last vehicle) “is transferred to the recipient or the rolling stock” (last vehicle) “is put into revenue service, whichever is first”.²⁷ As in the pre-award phase, recipients may perform the audit processes, or use third-party auditors to perform the review functions on the recipients’ behalf.

The purpose of the post-delivery audit is for recipients to verify that the built vehicle(s) comply with Buy America requirements, meet the recipient’s solicitation specification requirements, and if applicable, FMVSS.

Recipients **must** maintain contract files for the post-delivery phase that include certifications and supporting documentation. The required certifications are:

- **Post-Delivery Buy America Certification**; and
- **Post-Delivery Purchaser’s Requirements Certification** (based upon a review of the Resident Inspector’s Report), and.
- **Post-Delivery Certification of FMVSS Compliance or Inapplicability.**

The findings of the post-delivery audit process should be described in the Post-Delivery Audit Report.

3.1.1. Post-Delivery Buy America Certification Requirements

A review for the **Post-Delivery Buy America Certification** must be completed before the vehicle title is transferred to the recipient.

A recipient’s Post-Delivery Buy America Certification certifies either that the recipient:

- Obtained a letter from the FTA granting a waiver from Buy America requirements for the vehicle procurement; or
- Confirmed that the vehicle(s) procured:
 - Contain components that exceed 60 percent domestic content, by cost;
 - Final assembly of the vehicles took place in the U.S.; and
 - Final assembly activities were compliant with Buy America requirements.

The review period begins when the recipient signs a formal contract with the selected manufacturer and ends before the title transfer. If a waiver is not requested, or the request is denied, the auditor **must** verify that the manufacturer has provided enough detail in its documentation to demonstrate that FTA’s Buy America requirements have been met.

The recipient must confirm that the manufacturer has complied with U.S. final assembly requirements and that the cost of components and subcomponents is greater than 60 percent of

²⁷ 49 CFR § 663.5.(b)

the aggregate cost of all components. If the manufacturer does not provide sufficient information, the recipient should seek additional information.

i. **Buy America-Exempt Rolling Stock Vehicles**

If a vehicle is eligible for a waiver, the recipient **must**:

- Obtain a Buy America waiver letter from the FTA before a contract is awarded;
- Complete a Post-Delivery Buy America Exemption Certification (see [Appendix C.9](#) for sample certification); and
- Keep the Pre-Award Buy America Exemption Certification on file for future FTA reviews.

3.1.2. *Documentation for Post-Delivery Buy America Certification*

A recipient's Post-Delivery Audit Report should summarize the process the recipient used to verify the manufacturer's compliance with the Buy America requirements.

At the conclusion of the audit, the recipient **must** maintain a file for FTA reviews that includes:

- A copy of the Post-Delivery Audit Report, including:
 - The recipient's Post-Delivery Buy America Certificate;
 - The manufacturer's certificate of compliance or non-compliance with Buy America rolling stock requirements;
 - A list of vehicle components and subcomponents by manufacturer/supplier, their country of origin, and costs (either as a dollar figure or percentage);
 - The final assembly location;
 - A description of activities that took place at final assembly; and
 - The total actual cost of final assembly.

A sample Post-Delivery Audit Report is included in [Appendix D.2](#).

The manufacturer should provide the following documents for the **Post-Delivery Buy America Certification**:

- A detailed list of components and subcomponents which includes the manufacturer/supplier and country of origin,
- Cost of each component and corresponding subcomponents;
- Both domestic and foreign content, in dollars or as a percentage;
- The final assembly location;
- Description of all work to be performed at the final assembly location; and
- Cost of the work performed at the final assembly location.

Although the manufacturer can provide its domestic content worksheet in terms of percentages rather than dollars, the recipient or its appointed auditor needs to review supporting actual cost

documents in order to verify compliance. The Post-Delivery Audit Report should not include confidential data provided to the recipient or an auditor.

A manufacturer must be able to support all the costs depicted in the domestic content worksheet and final assembly scope of work. The final assembly costs include the direct labor to complete final assembly.

3.1.3. Best Practices for Post-Delivery Buy America Certifications

This subsection describes best practices to assist recipients, auditors, manufacturers, and suppliers in achieving compliance with the post-delivery certification requirements.

This guidance pertains to verifying compliance with domestic content requirements and U.S. final assembly requirements.

3.1.3.1. Verifying Domestic Content

As discussed for the pre-award audit, preparing and verifying domestic content compliance is fundamental to the audit process. Recipients should review and verify the claimed domestic content, by cost; and verify that the final assembly location and costs confirm that the minimum activities for final assembly are performed in the U.S.

Auditors should obtain current information on the cost of components and subcomponents from manufacturers, as illustrated in the domestic content worksheet templates in [Appendix A](#). The manufacturers' worksheets should note any changes in component suppliers and component percent domestic content, by cost.

Auditors can validate manufacturers' worksheets by reviewing POs or other source documents. Auditors may link the costs presented by the manufacturer to the specific source documents. Some auditors find it useful to add a column to the domestic content worksheet and track costs associated with specific POs so they can more easily monitor changes over time.

Auditors should verify that the manufacturer is accounting for all major components in its domestic content calculation and that all components and subcomponents are properly classified. See [Section 4.2.1, "Component/Subcomponent"](#), for further discussion on classifying components and determining their classification as being of domestic or foreign origin.

3.1.3.1.1. a. Components with Close To 60 Percent U.S. Subcomponents

During a post-delivery audit, auditors should direct specific attention to components with the highest dollar (or percentage) values as well as to major components with domestic content percentages close to the 60 percent minimum threshold. Similarly, auditors should also pay particular attention to vehicles with total domestic content that is very near the 60 percent minimum threshold. Change

orders and errors (even to smaller value components) could potentially slip the total domestic content percentage below the 60 percent minimum.

As discussed in [Section 2 Pre-Award Audit](#), auditors may also need to examine major component suppliers to evaluate whether or not the suppliers have satisfied Buy America requirements.

3.1.3.1.2. b. Reasonableness of Component and Subcomponent Costs

Auditors should compare costs for components and subcomponents listed on the manufacturers' domestic content worksheet to comparable vehicle procurement costs. The purpose of this comparison is to check that the manufacturers' domestic content worksheet appropriately depicts costs, so that component costs are not under- or over-valued in an effort to meet the "more than 60 percent" domestic content requirement for rolling stock procurements. Please see [Section 4](#) for more information on domestic content calculations.

3.1.3.2. Verification of U.S. Final Assembly

In order to verify that final assembly activities comply with Buy America requirements, recipients must review documentation provided by the manufacturer that demonstrates:

- That the actual final assembly site is located in the U.S.;
- That the actual final assembly activities meet the minimum requirements listed in Appendix D to 49 CFR § 661.11; and
- The actual total cost of final assembly, including labor and overhead costs.

Appendix D to 49 CFR § 661.11 provides the minimum requirements for final assembly of vehicles that manufacturers must meet to comply with Buy America regulations. The manufacturer's documentation should provide enough detail to allow a recipient to determine that its final assembly activities would constitute adequate final assembly under Buy America requirements.

The scope of final assembly activities may vary from manufacturer to manufacturer and even from vehicle to vehicle. During a post-delivery audit, auditors **must** review the manufacturer's actual activities and verify that the manufacturer performed the final assembly activities in the U.S.

An auditor may verify compliance through a variety of methods at the post-delivery stage, including, but not limited to:

- Reviewing the manufacturer's flow chart(s) of the production work station;
- Work instructions;
- QC/QA inspections (hold points);
- Manufacturing plans; and
- Assembly drawings (as would be kept or posted on a shop floor).

Recipients should consider whether auditor(s) should make on-site visits to verify final assembly activities. Site visits may be merited if a final assembly facility is new or if there are concerns about the manufacturer's capacity.

If a recipient determines that a manufacturer's final assembly processes do not include all the activities that are typically considered the minimum requirements, it can request an FTA determination of compliance. FTA will review these requests on a case-by-case basis to determine compliance with Buy America.

Buy America regulations also require that the manufacturer provide the cost of U.S. final assembly. While reviewing a proposed manufacturer's final assembly documentation, auditors should consider the following:

- Whether the manufacturer has provided sufficient documentation for the proposed cost of final assembly;
- Whether the manufacturer's actual total cost for final assembly includes all appropriate costs; and
- Whether the actual final assembly costs are reasonable.

If necessary, auditors should obtain a breakdown of the labor hours and hourly rates by craft (or a composite rate based on the ratio of the associated skill sets and supervisory personnel). The auditor should verify that the information the manufacturer provided is commensurate with the labor actually employed for the final assembly activity.

3.1.3.3. Supplier Buy America Certificate Documentation for Buy America Certification at Post-Delivery

The manufacturer is responsible for ensuring that suppliers and subcontractors comply with Buy America requirements. As a best practice, manufacturers should require all suppliers to provide sufficient documentation that demonstrates compliance with post-delivery audit requirements.

Manufacturers should obtain executed (signed and dated) certifications from all its suppliers for the post-delivery audit. A suggested template that captures the relevant information is provided in [Appendix C.5, "Sample Supplier Buy America Certification"](#). [Section 4.5](#) includes instructions to complete a **Supplier Buy America Certificate**.

In order to certify compliance, manufacturers and suppliers must be knowledgeable about the correct method of calculating a component's percentage of domestic content. [Section 4, "Domestic Content Calculations,"](#) provides detailed instructions for calculating domestic content.

Manufacturers should conduct due diligence when documenting the location of a supplier's manufacturing facility for each component (and ideally for each subcomponent). Manufacturers may perform supplier qualifications, which include site visits, detailed reviews of supplier documents, first article inspections, qualification testing, and source/pre-shipment inspection to verify suppliers' certifications.

Component suppliers executing the certificate have additional responsibility to ensure that subcomponents conform to specified standards.

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3.2. *Post-Delivery Purchaser's Requirements Certification – 49 CFR § 663.37*

This subsection describes the process that recipients should follow in order to demonstrate compliance with the **Post-Delivery Purchaser's Requirements Certification** in 49 CFR § 663.37.

The **Post-Delivery Purchaser's Requirements Certification** certifies that the delivered vehicles meet the contract specifications, based on the recipient's visual inspections, road tests, monitoring of the final assembly process and the Resident Inspector's Report of manufacturing activities.

The intent of the **Post-Delivery Purchaser's Requirements Certification** is to safeguard recipients by ensuring that the delivered vehicles comply with contract specifications.

3.2.1. *Post-Delivery Purchaser's Requirements Certification Requirements*

Recipients must keep a **Post-Delivery Purchaser's Requirements Certification** on file that certifies:

- A resident inspector (other than an agent or employee of the manufacturer) was at the manufacturing site throughout the period of manufacture and completed a report on the manufacture of the vehicles; AND
- After reviewing the **Resident Inspector's Report**, and visually inspecting and road testing the delivered vehicles, the vehicles meet the contract specifications.

Recipients are required to have an on-site resident inspector at the manufacturing site throughout the manufacturing period. The resident inspector **must**:

- Visit component manufacturing sites, as necessary, during the period of manufacture;
- Remain full-time at, or periodically visit, the final assembly location during the period of manufacture; and
- Visually inspect, participate in, and witness performance tests for the vehicles.

The resident inspector **must** prepare the Resident Inspector's Report that, at a minimum, provides:

- Accurate records of all vehicle construction activities (i.e., component manufacturing processes, final assembly activities, and collected quality control data);
- A summary of how the construction and operation of the vehicles meet (or do not meet) the contract specifications. The report should reference the above cited manufacturing processes, final assembly activities, and quality control data.

It is the recipient's responsibility to ensure that the vehicles comply with the contract specifications and identify areas of noncompliance. The purpose of the Resident Inspector's Report is to assist the recipient in verifying that the vehicles meet the contract specifications.

Upon delivery of the vehicles and following receipt and review of the Resident Inspector's Report, the recipient **must** visually inspect and road test the vehicles.

An on-site resident inspector is not required for (1) procurements of 10 or fewer buses; or (2) procurements of 20 vehicles or fewer serving rural (other than urbanized) areas, or urbanized areas of 200,000 people or fewer; or (3) any number of primary manufacturer standard production and unmodified vans. For such procurements, only visual inspection and road testing upon delivery to the recipient are required to certify compliance with the contract specifications.

3.2.2. Required Purchaser's Requirements Documentation at Post-Delivery

Once the recipient has reviewed the Resident Inspector's Report, successfully inspected and tested the delivered vehicles, and is satisfied the Purchaser's Requirements have been met, the recipient **must** then:

- Complete a **Post-Delivery Purchaser's Requirements Certification** (See Appendices [C.10](#) and [C.11](#) for sample certifications).

Recipients **must** maintain a file for future FTA reviews that should include:

- The Post-Delivery Purchaser's Requirements Certification,
- A copy of the Resident Inspector's Report and any associated supporting documentation,
- The solicitation specification,
- The manufacturer's bid specification,
- Authorizations of approved equals, and
- Any other supporting documentation.

3.2.3. Best Practices for Purchaser's Requirements Certification at Post-Delivery

While various approaches can be used to verify and document compliance for the **Post-Delivery Purchaser's Requirements Certification**, the following best practices are presented to assist recipients.

i. Assignment of Resident Inspector to Manufacturing/Final Assembly Site

The intent of the regulation is to help recipients ensure that the vehicles will comply with their contract specifications. It is not meant to require that a resident inspector remain "full-time" at the "manufacturer's site throughout the period of manufacture." Although this may be recommended for some vehicle procurements, the resident inspector requirements may be fulfilled with periodic visits.

3.2.3.1. Resident Inspector's Report for Purchaser's Requirements at Post-Delivery

As previously mentioned, the Resident Inspector's Report must include, at a minimum, accurate records of all vehicle construction activities (i.e., component manufacturing processes, final assembly activities, and collected quality control data) and a description of how the construction and operation of the vehicles meet (or do not meet) the contract specifications. Manufacturers should provide the necessary documentation to complete the review.

The Resident Inspector's Report and supporting documentation should include, at a minimum,

- A summary of the Resident Inspector's Report describing the scope of work performed on behalf of the recipient. The report should identify all activities that verify that the vehicle(s) comply with the contract specifications, and should include inspection, qualification, production testing, and acceptance testing.
- Recipient's independent inspections, in addition to the manufacturer's quality control (QC). This may be demonstrated by signed inspection reports (usually by hold point inspections where the manufacturer cannot proceed with work until the resident inspector's approval is obtained).
- The vehicle history books provided by the manufacturer and reviewed by the resident inspector prior to authorization for shipment of the vehicle(s). The resident inspector should briefly summarize the content of the vehicle history books provided by the manufacturer and include samples or excerpts that demonstrate accurate record of vehicle construction activities and adherence to quality control processes.
- Sample(s) of the Authorization-for-Shipment forms. The forms should include a sign-off signature by the resident inspector for each vehicle. The forms should list any open action items at the time of shipment.
- A summary describing how the manufacturer adequately implemented its QC processes throughout the manufacturing process. The summary should also address how the manufacturer adhered to appropriate FTA elements of quality. For example, a sample Closed Nonconformance Report should be included that identifies any corrective rework/repairs that were made and approved by the recipient or its designated representative. Note that nonconforming material that was repaired (that is, not fully conforming to OEM/specification requirements), or that is permitted to be used "as is" **must** be approved by the recipient.
- Verification that the manufacturer has maintained complete records of construction for each vehicle. These documents (typically called car files) will likely contain details beyond the scope of the Resident Inspector's Report such as all of the manufacturer's quality control (QC) inspections.
- Evidence that delivered vehicles have been inspected and road tested to confirm they meet contract specifications. The report should include a summary list of static, dynamic, and performance tests performed on each vehicle. A sample of

key test report results that show sign-offs for completed tests, failed tests, and any corrective action should also be included. This summary list of test results should be compared to the contract specifications to validate that the vehicles meet (or do not meet) contract specifications. Any elements that do not meet specification requirements should be accompanied by a contract modification approved by the recipient and should be identified in the Resident Inspector's Report summary.

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3.3. Post-Delivery Federal Motor Vehicle Safety Standards (FMVSS) Certification of Compliance or Inapplicability

The **Post-Delivery FMVSS Certification** is a requirement for most, if not all, motor vehicle procurements.

3.3.1. FMVSS Compliant Vehicles

Recipients purchasing motor vehicles/buses **must** demonstrate that the vehicles comply with FMVSS as part of the requirement for the post-delivery audit. Recipients **must** keep on file its certification that it received a copy of the manufacturer's self-certification information that the vehicle complies with FMVSS.²⁸

For FMVSS compliant motor vehicles, the recipient **must**:

- Obtain the FMVSS self-certification sticker information from the motor vehicle manufacturer;
- Confirm the manufacturer's FMVSS sticker is affixed to each motor vehicle. [The sticker is usually located in the interior front curbside of the motor vehicle (see Appendix [C.14](#) – [C.18](#) for sample FMVSS stickers)]; and
- Complete a **Post-Delivery FMVSS Compliance Certification** (see [Appendix C.11](#) for a sample certification).

Recipients should keep the manufacturer's Post-Delivery FMVSS self-certification information with the FMVSS Compliance Certification in its file.

²⁸ 49 CFR § 663.41.

3.3.2. *Post-Delivery Certification of FMVSS Inapplicability*

There are instances when motor vehicles are not subject to FMVSS. Consider, for example, 49 CFR § 571.7 (Applicability of FMVSS Regulation) and D 49 CFR Part 555 (Temporary Exemptions from Motor Vehicle Safety Standards). In such cases, recipients **must** keep on file certification that the contracted motor vehicles are not subject to FMVSS.

If the contracted motor vehicles are not subject to FMVSS, the recipient **must**:

- Obtain the manufacturer's certified statement indicating that the contracted motor vehicles are not subject to FMVSS;
- Complete a **Post-Delivery Certification of FMVSS Inapplicability** (see [Appendix C.13](#) for a sample certification).

Recipients should keep the manufacturer's Post-Delivery FMVSS exemption statement with the Pre-Award Certification of FMVSS Inapplicability in its file.

4. Domestic Content Calculations

This section provides guidance and clarification on how to calculate domestic content correctly. It elaborates on the distinctions in the treatment of domestic content for components and subcomponents and offers clarification on how to determine what a component versus a subcomponent is. The intent is to assist recipients in the verification and validation of domestic content calculations to ensure compliance with the Buy America requirements.

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4.1. Vehicle Level Domestic Content Calculations

Calculation of the domestic content is conducted at two levels, the vehicle level, and the component level. Each is somewhat different in nature.

- a) At the vehicle level - The rolling stock manufacturer must demonstrate that the cost of components produced in the U.S. is more than 60 percent of the cost of all components on the vehicle.²⁹ The recipient must verify the manufacturer's information.
- b) At the component level - The suppliers must demonstrate that for a component to be included as a domestic component, it must be manufactured in the U.S. and more than 60 percent of its subcomponents, by cost, must be manufactured in the United States.³⁰ (Note, [Section 4.3.3](#) describes how to count domestic content in components where the domestic subcomponent content is below 60 percent.)

Consequently, the recipient's verification of the rolling stock manufacturer's compliance with the Buy America rule is heavily dependent on and requires accurate domestic content calculation by the manufacturer and suppliers.

An auditor must verify that the vehicle's total domestic and foreign components cost is the material cost only and does not include any non-cost elements.

The auditor should follow the following steps to arrive at the total cost of materials.

STEP 1 **Verify the Contract Total Price**

For the pre-award audit, Contract Total Price is the price as certified by the manufacturer on the contract pricing forms at the time of the contract award.

For the post-delivery audit, the Contract Total Price is the price as defined in the executed contract and any executed Change Orders.

²⁹ 49 CFR § 661.11(a).

³⁰ 49 CFR § 661.11(g).

STEP 2 **Verify the Contract Vehicle Total Price for all vehicles being supplied**

For the pre-award audit, this is the price, on the line item(s) for each type of vehicle that consists of the vehicle unit price and total price for the quantity being supplied, as certified by the manufacturer on the contract pricing forms at the time of the contract award.

For the post-delivery audit, this is the price, on the line item(s) for each type of vehicle that consists of the vehicle unit price and total price for the quantity being supplied, as defined in the executed contract, plus any executed change orders defining change order vehicle unit price and the total price for the quantity of vehicles affected by the change orders.

Ensure that the Contract Vehicle Total Price does not include any other line item prices from the pricing form (and from the change order, if applicable) for items not installed on the vehicle. These other line items may include prices for – mobilization, spare parts, special tools, diagnostic and test equipment (DTE), manuals, training, performance bond, on-site warranty support, travel costs, etc.

STEP 3 **Verify the cost of all Non-Recurring Expenses (NREs)**

Deduct from the Contract Vehicle Total Price, all Non-Recurring Expenses (NREs) that will be incurred by the manufacturer. The manufacturer should identify costs for each NRE. A list of typical NREs is shown in [Section 4.4.1](#). It should be noted that one or more NRE(s) may have already been identified as line items on pricing forms.

For those NREs not identified on pricing forms, the manufacturer should provide the auditor evidence for verification.

STEP 4 **Verify the cost of Final Assembly**

The manufacturer should identify a detailed breakdown of the final assembly cost and provide the auditor necessary evidence for verification.

STEP 5 **Verify the Contract Vehicle Total Material Cost**

Deduct from the Contract Vehicle Total Price, the manufacturer's cost of all NREs and final assembly cost.

	Contract Vehicle Total Price
—	Non Recurring Costs
—	Final Assembly
=	Total Material Cost

STEP 6 **Verify that the Contract Vehicle Total Material Cost, as derived from auditor's independent analysis, matches with that computed by the manufacturer**

The Contract Vehicle Total Material Cost will serve as the basis to compute per vehicle cost of materials.

STEP 7 **Verify Vehicle Material Cost**

This is the price computed by dividing the Contract Vehicle Total Material Cost into the number of vehicles being supplied.

	Contract Vehicle Total Material Costs
÷	Number of Vehicles
=	Vehicle Material Cost

Upon verifying the Vehicle Material Cost, the manufacturer should calculate the vehicle level domestic content for the material cost for all vehicle components using the sample worksheet template (see [Section 4.3](#) and [Appendix A](#)).

4.2. Domestic Content - Relevant Definitions

For vehicle components to be considered domestic, more than 60 percent of the subcomponents by cost must be of domestic origin. Therefore, when evaluating domestic content, it is important to have a full understand **the manufacturer of the parts, their country of origin, and the percent cost of its subcomponents** relative to the cost of the component.

4.2.1. Component/Subcomponent

The standards for designation as domestic are more rigorous for components than for subcomponents and therefore the distinction between the two is important.

A component, as defined in 49 CFR § 661.3, is any article, material, or supply, whether manufactured or unmanufactured, that is directly incorporated into an end product at the final assembly location. Major vehicle components are listed in Appendices B and C to 49 CFR § 661.11; this illustrative list is a not intended to be exhaustive. Also 49 CFR § 661.11 (t), (u), and (v) lists specific components that make-up train control (t), communication equipment (u), and traction power equipment (v). (For further discussion, please refer to Sections [4.4.5](#) and [4.4.6](#) Clarification for Domestic Content of Complex Components –Rail Vehicle Truck Component and Rail Vehicle Communication Equipment Component, respectively.) If a component is determined to be domestic, its entire cost may be used in calculating the cost of domestic content of the vehicle.

In contrast, a subcomponent is any article, material, or supply, whether manufactured or unmanufactured, that is incorporated directly into a component. A subcomponent need only be manufactured in the U.S. to be considered domestic.

4.2.2. Manufacturing/Assembly

A key concept for correctly determining whether items are components or subcomponents is to understand the difference between manufacturing versus final assembly.

Final assembly is the creation of the end product from individual elements brought together for that purpose through application of manufacturing processes.^[1]

Manufacturing, in contrast, refers to the activities that transform the subcomponents into a new and functionally different component.^[2]

In the case of a rolling stock vehicle, while the carbody is itself a component of the completed vehicle, it is also the parent component onto which the other components will be installed. Therefore, each item installed directly onto the carbody is a component.

^[1] See 49 CFR 661.11 (r) for explanation pertaining to final assembly.

^[2] See 49 CFR 661.11 (e) for explanation pertaining to manufacturing.

In the case of a railcar, the truck is likewise a parent component, as it is the structure onto which its individual components will be installed. Therefore, each item installed directly onto the truck (frame) would be a component.

Appendices B and C of 49 CFR §661.11 provide illustrative lists of bus and railcar components, respectively.

The same rationale is applied for other equipment, such as propulsion equipment and communication equipment. In each case, the individual items that are installed on the vehicle are components.

At a minimum, the items listed in Appendices B and C of 49 CFR § 661.11 should be components for domestic content calculation purposes.^[3]

If there are new technologies that supersede the items in Appendices B and C of 49 CFR § 661.11, these should be carefully reviewed to ensure that the component/subcomponent designations applied for that project are consistent with regulations and the aforementioned rationale. If there is any question of compliance, recipients should consult with FTA.

^[3] See FTA Dear Colleague letter No. C-01-04 dated March 30, 2001.

4.3. Domestic Content Worksheet

[Appendix A](#) provides sample Domestic Content Calculations Worksheet templates for buses and rail vehicles for rolling stock manufacturers.

These templates are intended to allow a standard presentation of domestic content calculations for bus and rail vehicles as well as facilitate verification of the following:

- Compliance with 49 CFR § 661.11 Appendices B and C – Typical Components of Bus and Rail Rolling Stock list.
- All components are accounted for in the domestic content calculation and there is a complete total of the vehicle domestic and foreign content.
- Manufacturer's confidential dollar value for the vehicle domestic content can be assessed by the auditor.
- Each component has been correctly identified as either domestic or foreign based on the supplier identification and the manufacturing location.

4.3.1. Rail Vehicle Domestic Content Worksheet

[Appendix A.1](#) provides a sample Domestic Content Calculations Worksheet template for rail vehicles.

As a minimum, the manufacturer's list of components should include items listed in Appendix C to 49 CFR Part § 661.11 – Typical Components of Rail Rolling Stock, which states:

“The following is a list of items that typically would be considered components of rail rolling stock. This list is not all-inclusive.

Car shells, engines, main transformer, pantographs, traction motors, propulsion gear boxes, interior linings, acceleration and braking resistors, propulsion controls, low voltage auxiliary power supplies, air conditioning equipment, air brake compressors, brake controls, foundation brake equipment, articulation assemblies, train control systems, window assemblies, communication equipment, lighting, seating, doors, door actuators and controls, wheelchair lifts and ramps to make the vehicle accessible to persons with disabilities, couplers and draft gear, trucks, journal bearings, axles, diagnostic equipment, and third rail pick-up equipment.”

The instructions for completing the rail vehicle worksheet can be found in [Section 4.3.3](#)

4.3.2. Bus Vehicle Domestic Content Worksheet

[Appendix A.2](#) provides sample Domestic Content Calculations Worksheet template for buses.

As a minimum, the manufacturer's list of components should include items that are listed in Appendix B to 49 CFR Part § 661.11 – Typical Components of Buses, which states:

“The following is a list of items that typically would be considered components of a bus. This list is not all-inclusive.

Car body shells, engines, transmissions, front axle assemblies, rear axle assemblies, drive shaft assemblies, front suspension assemblies, rear suspension assemblies, air compressor and pneumatic systems, generator/ alternator and electrical systems, steering system assemblies, front and rear air brake assemblies, air conditioning compressor assemblies, air conditioning evaporator/ condenser assemblies, heating systems, passenger seats, driver's seat assemblies, window assemblies, entrance and exit door assemblies, door control systems, destination sign assemblies, interior lighting assemblies, front and rear end cap assemblies, front and rear bumper assemblies, specialty steel (structural steel tubing, etc.) aluminum extrusions, aluminum, steel or fiberglass exterior panels, and interior trim, flooring, and floor coverings.”

The instructions for completing the rail vehicle worksheet can be found in [Section 4.3.3](#)

4.3.3. Domestic Content Worksheet Instructions

Below is a sample of the Domestic Content Worksheet with step-by-step instructions.

The worksheet should include any components listed in the Appendices to 49 CFR § 661.11. Generally, Parts installed on the Rolling Stock End Product at the Final Assembly Site are considered components. Those cells that are colored gray or white are intended for input. Other cells highlighted in yellow are calculated or protected from change.

As stated in 49 CFR § 661.11, the cost for the component would be the purchase price paid by the vehicle manufacturer to the component supplier. Similarly, the cost for the subcomponent would be the purchase price paid by the component supplier to the subcomponent supplier.

These purchase prices should include the cost of labor and materials incorporated into the component or subcomponent, an allowance for profit, and the administrative and overhead costs attributable to that component or subcomponent under normal accounting principles. In addition, transportation costs to the final assembly location must be included in calculating the cost of foreign components and subcomponents (if components using foreign subcomponents are manufactured by the vehicle manufacturer at the vehicle final assembly location).

System (or Group of Components)	Supplier Name	Manufacturing Location (U.S. or Foreign)	Manufacturing Location (If U.S. - City & State; If Foreign - City & Country)	Component and Subcomponent Material Costs		Subcomponent % of Component and Component Total %		U.S. Content (If U.S. % > 60%, entire 100% component cost is counted)	Component % of Vehicle	
Component				U.S.	Foreign	U.S.	Foreign		U.S.	Foreign
Subcomponent										
System 1										
Component 1	Component Supplier	U.S.	Any town, State							
Subcomponent 1.1	Sub Supplier 1.1	U.S.	Any town, State	\$25,000.00	\$0.00	8.1%	0.0%			
Subcomponent 1.2	Sub Supplier 1.2	U.S.	Any town, State	\$35,000.00	\$0.00	11.3%	0.0%			
Subcomponent 1.3	Sub Supplier 1.3	U.S.	Any town, State	\$65,000.00	\$0.00	21.0%	0.0%			
Subcomponent 1.4	Sub Supplier 1.3	Foreign	Any city, Country	\$0.00	\$75,000.00	0.0%	24.2%			
Subcomponent 1.5	Sub Supplier 1.4	U.S.	Any town, State	\$110,000.00	\$0.00	35.5%	0.0%			
Component 1 Material Subtotal				\$235,000.00	\$75,000.00	75.8%	24.2%			
Component 1 Total Cost (including Profit & Manufacturing)				\$360,000.00				\$360,000.00	18.00%	0.00%
System 2										
Component 2	Component Supplier	U.S.	Any town, State							
Subcomponent 2.1	Sub Supplier 1.1	U.S.	Any town, State	\$50,000.00	\$0.00	34.0%	0.0%			
Subcomponent 2.2	Sub Supplier 1.2	U.S.	Any town, State	\$10,000.00	\$0.00	6.8%	0.0%			
Subcomponent 2.3	Sub Supplier 1.3	Foreign	Any city, Country	\$0.00	\$45,000.00	0.0%	30.6%			
Subcomponent 2.4	Sub Supplier 1.3	Foreign	Any city, Country	\$0.00	\$15,000.00	0.0%	10.2%			
Subcomponent 2.5	Sub Supplier 1.4	Foreign	Any city, Country	\$0.00	\$18,000.00	0.0%	12.2%			
Subcomponent 2.6	Sub Supplier 1.5	Foreign	Any city, Country	\$0.00	\$9,000.00	0.0%	6.1%			
Component 2 Material Subtotal				\$60,000.00	\$87,000.00	40.8%	59.2%			
Component 2 Total Cost (including Profit & Manufacturing)				\$165,000.00				\$60,000.00	3.00%	4.35%
Totals										
Vehicle Material Subtotal				\$1,480,000.00	\$520,000.00				74.00%	26.00%
Vehicle Material Total Cost				\$2,000,000.00						
Vehicle Total Cost (including Profit & Manufacturing)				\$2,200,000.00						

4 DOMESTIC CONTENT CALCULATIONS

STEP 1

In *System/Component/Subcomponent* column, fill in all vehicle components, including as a minimum those identified in Appendices B and C to 49 CFR Part § 661.11, that will add up to 100% Vehicle Material Cost, domestic and foreign. Identify components and subcomponent by name and/or part number traceable to the procurement. For each component, fill in corresponding subcomponents as applicable. Identify major subcomponents as separate line items. Combine minor subcomponents as a single line item denoted as “various,” “miscellaneous,” or “other.”

Use extra pages as needed to cover all components and subcomponents.

System (or Group of Components)	Supplier Name	Manufacturing Location (U.S. or Foreign)	Manufacturing Location (If U.S. - City & State; If Foreign - City & Country)	Component and Subcomponent Material Costs		Subcomponent % of Component and Component Total %		U.S. Content (If U.S. % > 60%, entire 100% component cost is counted)	Component % of Vehicle	
				U.S.	Foreign	U.S.	Foreign		U.S.	Foreign
System 1										
Component 1	Component Supplier	U.S.	Any town, State							
Subcomponent 1.1	Sub Supplier 1.1	U.S.	Any town, State	\$25,000.00	\$0.00	8.1%	0.0%			
Subcomponent 1.2	Sub Supplier 1.2	U.S.	Any town, State	\$35,000.00	\$0.00	11.3%	0.0%			
Subcomponent 1.3	Sub Supplier 1.3	U.S.	Any town, State	\$65,000.00	\$0.00	21.0%	0.0%			
Subcomponent 1.4	Sub Supplier 1.3	Foreign	Any city, Country	\$0.00	\$75,000.00	0.0%	24.2%			
Subcomponent 1.5	Sub Supplier 1.4	U.S.	Any town, State	\$110,000.00	\$0.00	35.5%	0.0%			
Component 1 Material Subtotal				\$235,000.00	\$75,000.00	75.8%	24.2%			
Component 1 Total Cost (including Profit & Manufacturing)			\$360,000.00					\$360,000.00	18.00%	0.00%

STEP 2

In *Supplier Name* column, fill in supplier's name for each component and corresponding subcomponent(s).

System (or Group of Components)	Supplier Name	Manufacturing Location (U.S. or Foreign)	Manufacturing Location (If U.S. - City & State; If Foreign - City & Country)	Component and Subcomponent Material Costs		Subcomponent % of Component and Component Total %		U.S. Content (If U.S. % > 60%, entire 100% component cost is counted)	Component % of Vehicle	
				U.S.	Foreign	U.S.	Foreign		U.S.	Foreign
System 1										
Component 1	Component Supplier	U.S.	Any town, State							
Subcomponent 1.1	Sub Supplier 1.1	U.S.	Any town, State	\$25,000.00	\$0.00	8.1%	0.0%			
Subcomponent 1.2	Sub Supplier 1.2	U.S.	Any town, State	\$35,000.00	\$0.00	11.3%	0.0%			
Subcomponent 1.3	Sub Supplier 1.3	U.S.	Any town, State	\$65,000.00	\$0.00	21.0%	0.0%			
Subcomponent 1.4	Sub Supplier 1.3	Foreign	Any city, Country	\$0.00	\$75,000.00	0.0%	24.2%			
Subcomponent 1.5	Sub Supplier 1.4	U.S.	Any town, State	\$110,000.00	\$0.00	35.5%	0.0%			
Component 1 Material Subtotal				\$235,000.00	\$75,000.00	75.8%	24.2%			
Component 1 Total Cost (including Profit & Manufacturing)			\$360,000.00					\$360,000.00	18.00%	0.00%

STEP 3

In the first *Manufacturing Location* column, for each component and corresponding subcomponent(s), select U.S., Foreign w/ Tariff Exemption, or Foreign from the selector box.

System (or Group of Components)	Supplier Name	Manufacturing Location (U.S. or Foreign)	Manufacturing Location (If U.S. - City & State; If Foreign - City & Country)	Component and Subcomponent Material Costs		Subcomponent % of Component and Component Total %		U.S. Content (If U.S. % > 60%, entire 100% component cost is counted)	Component % of Vehicle	
Component				U.S.	Foreign	U.S.	Foreign		U.S.	Foreign
Subcomponent										
System 1										
Component 1	Component Supplier	U.S.	Any town, State							
Subcomponent 1.1	Sub Supplier 1.1	U.S.	Any town, State	\$25,000.00	\$0.00	8.1%	0.0%			
Subcomponent 1.2	Sub Supplier 1.2	U.S.	Any town, State	\$35,000.00	\$0.00	11.3%	0.0%			
Subcomponent 1.3	Sub Supplier 1.3	U.S.	Any town, State	\$65,000.00	\$0.00	21.0%	0.0%			
Subcomponent 1.4	Sub Supplier 1.3	Foreign	Any city, Country	\$0.00	\$75,000.00	0.0%	24.2%			
Subcomponent 1.5	Sub Supplier 1.4	U.S.	Any town, State	\$110,000.00	\$0.00	35.5%	0.0%			
Component 1 Material Subtotal				\$235,000.00	\$75,000.00	75.8%	24.2%			
Component 1 Total Cost (including Profit & Manufacturing)				\$360,000.00				\$360,000.00	18.00%	0.00%

STEP 4

In the second *Manufacturing Location* column for each component and corresponding subcomponent(s), fill in the City and State for U.S. or the City and Country for Foreign.

System (or Group of Components)	Supplier Name	Manufacturing Location (U.S. or Foreign)	Manufacturing Location (If U.S. - City & State; If Foreign - City & Country)	Component and Subcomponent Material Costs		Subcomponent % of Component and Component Total %		U.S. Content (If U.S. % > 60%, entire 100% component cost is counted)	Component % of Vehicle	
Component				U.S.	Foreign	U.S.	Foreign		U.S.	Foreign
Subcomponent										
System 1										
Component 1	Component Supplier	U.S.	Any town, State							
Subcomponent 1.1	Sub Supplier 1.1	U.S.	Any town, State	\$25,000.00	\$0.00	8.1%	0.0%			
Subcomponent 1.2	Sub Supplier 1.2	U.S.	Any town, State	\$35,000.00	\$0.00	11.3%	0.0%			
Subcomponent 1.3	Sub Supplier 1.3	U.S.	Any town, State	\$65,000.00	\$0.00	21.0%	0.0%			
Subcomponent 1.4	Sub Supplier 1.3	Foreign	Any city, Country	\$0.00	\$75,000.00	0.0%	24.2%			
Subcomponent 1.5	Sub Supplier 1.4	U.S.	Any town, State	\$110,000.00	\$0.00	35.5%	0.0%			
Component 1 Material Subtotal				\$235,000.00	\$75,000.00	75.8%	24.2%			
Component 1 Total Cost (including Profit & Manufacturing)				\$360,000.00				\$360,000.00	18.00%	0.00%

STEP 5

In *Component Total Cost (including Profit & Manufacturing)* row, fill in the component total cost, which includes overhead and manufacturing costs.

System (or Group of Components)	Supplier Name	Manufacturing Location (U.S. or Foreign)	Manufacturing Location (If U.S. - City & State; If Foreign - City & Country)	Component and Subcomponent Material Costs		Subcomponent % of Component and Component Total %		U.S. Content (If U.S. % > 60%, entire 100% component cost is counted)	Component % of Vehicle	
Component				U.S.	Foreign	U.S.	Foreign		U.S.	Foreign
Subcomponent										
System 1										
Component 1	Component Supplier	U.S.	Any town, State							
Subcomponent 1.1	Sub Supplier 1.1	U.S.	Any town, State	\$25,000.00	\$0.00	8.1%	0.0%			
Subcomponent 1.2	Sub Supplier 1.2	U.S.	Any town, State	\$35,000.00	\$0.00	11.3%	0.0%			
Subcomponent 1.3	Sub Supplier 1.3	U.S.	Any town, State	\$65,000.00	\$0.00	21.0%	0.0%			
Subcomponent 1.4	Sub Supplier 1.3	Foreign	Any city, Country	\$0.00	\$75,000.00	0.0%	24.2%			
Subcomponent 1.5	Sub Supplier 1.4	U.S.	Any town, State	\$110,000.00	\$0.00	35.5%	0.0%			
Component 1 Material Subtotal				\$235,000.00	\$75,000.00	75.8%	24.2%			
Component 1 Total Cost (including Profit & Manufacturing)				\$360,000.00				\$360,000.00	18.00%	0.00%

STEP 6

In *Component and Subcomponent Material Costs* columns:

- a) For each component, enter the dollar amount of the corresponding subcomponent(s) under the *U.S. and Foreign* sub-columns, on the designated row(s).

System (or Group of Components)	Supplier Name	Manufacturing Location (U.S. or Foreign)	Manufacturing Location (if U.S. - City & State; if Foreign - City & Country)	Component and Subcomponent Material Costs		Subcomponent % of Component and Component Total %		U.S. Content (if U.S. % > 60%, entire 100% component cost is counted)	Component % of Vehicle		
Component				U.S.	Foreign	U.S.	Foreign		U.S.	Foreign	
Subcomponent											
System 1											
Component 1	Component Supplier	U.S.	Any town, State								
Subcomponent 1.1	Sub Supplier 1.1	U.S.	Any town, State	\$25,000.00	\$0.00	8.1%	0.0%				
Subcomponent 1.2	Sub Supplier 1.2	U.S.	Any town, State	\$35,000.00	\$0.00	11.3%	0.0%				
Subcomponent 1.3	Sub Supplier 1.3	U.S.	Any town, State	\$65,000.00	\$0.00	21.0%	0.0%				
Subcomponent 1.4	Sub Supplier 1.3	Foreign	Any city, Country	\$0.00	\$75,000.00	0.0%	24.2%				
Subcomponent 1.5	Sub Supplier 1.4	U.S.	Any town, State	\$110,000.00	\$0.00	35.5%	0.0%				
Component 1 Material Subtotal				\$235,000.00	\$75,000.00	75.8%	24.2%				
Component 1 Total Cost (including Profit & Manufacturing)					\$360,000.00			\$360,000.00	18.00%	0.00%	

- b) Compute the material subtotal cost for each component by adding the cost of all of its U.S. and Foreign corresponding subcomponents, and enter on the row designated *Component Material Subtotal* under the *U.S. and Foreign* sub-columns as applicable.

System (or Group of Components)	Supplier Name	Manufacturing Location (U.S. or Foreign)	Manufacturing Location (If U.S. - City & State; If Foreign - City & Country)	Component and Subcomponent Material Costs		Subcomponent % of Component and Component Total %		U.S. Content (If U.S. % > 60%, entire 100% component cost is counted)	Component % of Vehicle	
Component				U.S.	Foreign	U.S.	Foreign		U.S.	Foreign
Subcomponent										
System 1										
Component 1	Component Supplier	U.S.	Any town, State							
Subcomponent 1.1	Sub Supplier 1.1	U.S.	Any town, State	\$25,000.00	\$0.00	8.1%	0.0%			
Subcomponent 1.2	Sub Supplier 1.2	U.S.	Any town, State	\$35,000.00	\$0.00	11.3%	0.0%			
Subcomponent 1.3	Sub Supplier 1.3	U.S.	Any town, State	\$65,000.00	\$0.00	21.0%	0.0%			
Subcomponent 1.4	Sub Supplier 1.3	Foreign	Any city, Country	\$0.00	\$75,000.00	0.0%	24.2%			
Component 1 Material Subtotal				\$235,000.00	\$75,000.00	75.8%	24.2%			
Component 1 Total Cost (including Profit & Manufacturing)								\$360,000.00	18.00%	0.00%

STEP 7

In *Subcomponent % of Component and Component Total %* columns:

- a) For each component, compute the material cost percentage of each of its U.S. and Foreign corresponding subcomponents, and enter on the designated rows under *U.S.* and *Foreign* sub-columns as applicable.

Subcomponent 1.1	\$25,000
U.S. Subcomponent Material Subtotal	(\$235,000 +
Foreign Subcomponent Material Subtotal	\$75,000) =
$\div$ Component 1 Material Subtotal	\$310,000
$=$ Percentage of U.S. Domestic Content for Subcomponent 1.1	8.1%

System (or Group of Components)	Supplier Name	Manufacturing Location (U.S. or Foreign)	Manufacturing Location (If U.S. - City & State; If Foreign - City & Country)	Component and Subcomponent Material Costs		Subcomponent % of Component and Component Total %		U.S. Content U.S. % >60%, entire 100% component cost is counted)	Component % of Vehicle	
Component				U.S.	Foreign	U.S.	Foreign		U.S.	Foreign
Subcomponent										
System 1										
Component 1	Component Supplier	U.S.	Any town, State							
Subcomponent 1.1	Sub Supplier 1.1	U.S.	Any town, State	\$25,000.00	\$0.00	8.1%	0.0%			
Subcomponent 1.2	Sub Supplier 1.2	U.S.	Any town, State	\$35,000.00	\$0.00	11.3%	0.0%			
Subcomponent 1.3	Sub Supplier 1.3	U.S.	Any town, State	\$65,000.00	\$0.00	21.0%	0.0%			
Subcomponent 1.4	Sub Supplier 1.3	Foreign	Any city, Country	\$0.00	\$75,000.00	0.0%	24.2%			
Subcomponent 1.5	Sub Supplier 1.4	U.S.	Any town, State	\$110,000.00	\$0.00	35.5%	0.0%			
Component 1 Material Subtotal				\$235,000.00	\$75,000.00	75.8%	24.2%			
Component 1 Total Cost			(including Profit & Manufacturing)		\$360,000.00			\$360,000.00	18.00%	0.00%

4 DOMESTIC CONTENT CALCULATIONS

- b) Calculate the total material cost percentage of each U.S. and Foreign component by dividing its cost into *Component Total*, in *Component / Subcomponent Cost* columns under *U.S.* and *Foreign* sub-columns as applicable. This should total 100% of *U.S.* and *Foreign* sub-columns costs on the row designated *Component Material Subtotal*.

U.S. Subcomponents Material Subtotal	\$235,000
÷ Component 1 Material Subtotal	\$310,000
= Percentage of U.S. Domestic Content	75.8%

System (or Group of Components)	Supplier Name	Manufacturing Location (U.S. or Foreign)	Manufacturing Location (If U.S. - City & State; If Foreign - City & Country)	Component and Subcomponent Material Costs		Subcomponent % of Component and Component Total %		U.S. Content (If U.S. % > 60%, entire 100% component cost is counted)	Component % of Vehicle	
Component				U.S.	Foreign	U.S.	Foreign		U.S.	Foreign
Subcomponent										
System 1										
Component 1	Component Supplier	U.S.	Any town, State							
Subcomponent 1.1	Sub Supplier 1.1	U.S.	Any town, State	\$25,000.00	\$0.00	8.1%	0.0%			
Subcomponent 1.2	Sub Supplier 1.2	U.S.	Any town, State	\$35,000.00	\$0.00	11.3%	0.0%			
Subcomponent 1.3	Sub Supplier 1.3	U.S.	Any town, State	\$65,000.00	\$0.00	21.0%	0.0%			
Subcomponent 1.4	Sub Supplier 1.3	Foreign	Any city, Country	\$0.00	\$75,000.00	0.0%	24.2%			
Subcomponent 1.5	Sub Supplier 1.4	U.S.	Any town, State	\$110,000.00	\$0.00					
Component 1 Material Subtotal				\$235,000.00	\$75,000.00	75.8%	24.2%			
Component 1 Total Cost				(including Profit & Manufacturing)				\$360,000.00	18.00%	0.00%

STEP 8

In *U.S. Content* (if *U.S. content* >60%, count 100%) column and on the row designated *Component Total Cost* for each component, enter the total material cost for that component. Calculate the total material cost using the formula:

- a) If the component is U.S. and the U.S. percentage of the component is greater than 60%
- Then add *Component Total Cost* to the column *U.S. Content* to count 100%; or

System (or Group of Components)	Supplier Name	Manufacturing Location (U.S. or Foreign)	Manufacturing Location (If U.S. - City & State; If Foreign - City & Country)	Component and Subcomponent Material Costs		Subcomponent % of Component and Component Total %		U.S. Content (If U.S. % >60%, entire 200% component cost is counted)	Component % of Vehicle	
Component				U.S.	Foreign	U.S.	Foreign		U.S.	Foreign
Subcomponent										
System 1										
Component 1	Component Supplier	U.S.	Any town, State							
Subcomponent 1.1	Sub Supplier 1.1	U.S.	Any town, State	\$25,000.00	\$0.00	8.1%	0.0%			
Subcomponent 1.2	Sub Supplier 1.2	U.S.	Any town, State	\$35,000.00	\$0.00	11.3%	0.0%			
Subcomponent 1.3	Sub Supplier 1.3	U.S.	Any town, State	\$65,000.00	\$0.00	21.0%	0.0%			
Subcomponent 1.4	Sub Supplier 1.3	Foreign	Any city, Country	\$0.00	\$75,000.00	0.0%	24.2%			
Subcomponent 1.5	Sub Supplier 1.4	U.S.	Any town, State	\$110,000.00	\$0.00	36.6%	0.0%			
Component 1 Material Subtotal				\$235,000.00	\$75,000.00	75.8%	24.2%			
Component 1 Total Cost (including Profit & Manufacturing)				\$360,000.00				\$360,000.00	18.00%	0.00%

- b) If the component is U.S. and the U.S. percentage of the component is less than 60%

- Then add the total of only U.S. subcomponent material costs on the row *Component Material Subtotal*, to the column *U.S. Content*; or

System (or Group of Components)	Supplier Name	Manufacturing Location (U.S. or Foreign)	Manufacturing Location (If U.S. - City & State; If Foreign - City & Country)	Component and Subcomponent Material Costs		Subcomponent % of Component and Component Total %		U.S. Content (If U.S. % >60%, entire 100% component cost is counted cost)	Component % of Vehicle	
Component				U.S.	Foreign	U.S.	Foreign		U.S.	Foreign
Subcomponent										
System 1										
Component 1	Component Supplier	U.S.	Any town, State							
Subcomponent 1.1	Sub Supplier 1.1	Foreign	Any city, Country	\$0.00	\$25,000.00	0.0%	8.1%			
Subcomponent 1.2	Sub Supplier 1.2	Foreign	Any city, Country	\$0.00	\$35,000.00	0.0%	11.3%			
Subcomponent 1.3	Sub Supplier 1.3	Foreign	Any city, Country	\$0.00	\$65,000.00	0.0%	21.0%			
Subcomponent 1.4	Sub Supplier 1.3	U.S.	Any town, State	\$75,000.00	\$0.00	24.2%	0.0%			
Subcomponent 1.5	Sub Supplier 1.4	Foreign	Any city, Country	\$0.00	\$110,000.00	0.0%	35.5%			
Component 1 Material Subtotal				\$75,000.00	\$235,000.00	24.2%	75.8%			
Component 1 Total Cost (including Profit & Manufacturing)				\$360,000.00				\$75,000.00	3.75%	11.75%

4 DOMESTIC CONTENT CALCULATIONS

c) If the component is foreign and the U.S. components being incorporated into the foreign component receive a tariff exemption

- Then add the total of only U.S. subcomponent material costs on the row *Component Material Subtotal*, to the column *U.S. Content*; or

System (or Group of Components)	Supplier Name	Manufacturing Location (U.S. or Foreign)	Manufacturing Location (If U.S. - City & State; If Foreign - City & Country)	Component and Subcomponent Material Costs		Subcomponent % of Component and Component Total %		U.S. Content (If U.S. % > 60%, entire 100% component cost is counted)	Component % of Vehicle	
				U.S.	Foreign	U.S.	Foreign		U.S.	Foreign
System 1										
Component 1	Component Supplier	Foreign w/ Tariff Ex.	Any city, Country							
Subcomponent 1.1	Sub Supplier 1.1	U.S.	Any town, State	\$25,000.00	\$0.00	8.1%	0.0%			
Subcomponent 1.2	Sub Supplier 1.2	U.S.	Any town, State	\$35,000.00	\$0.00	11.3%	0.0%			
Subcomponent 1.3	Sub Supplier 1.3	U.S.	Any town, State	\$65,000.00	\$0.00	21.0%	0.0%			
Subcomponent 1.4	Sub Supplier 1.3	Foreign	Any city, Country	\$0.00	\$75,000.00	0.0%	24.2%			
Subcomponent 1.5	Sub Supplier 1.4	U.S.	Any town, State	\$0.00	\$0.00	35.5%	0.0%			
Component 1 Material Subtotal				\$235,000.00	\$75,000.00	75.8%	24.2%			
Component 1 Total Cost (including Profit & Manufacturing)			\$360,000.00					\$235,000.00	11.75%	6.25%

d) If the component is foreign

- Then enter \$0.00 in the column labeled *U.S. Content*

System (or Group of Components)	Supplier Name	Manufacturing Location (U.S. or Foreign)	Manufacturing Location (If U.S. - City & State; If Foreign - City & Country)	Component and Subcomponent Material Costs		Subcomponent % of Component and Component Total %		U.S. Content (If U.S. % > 60%, entire 100% component cost is counted)	Component % of Vehicle	
Component				U.S.	Foreign	U.S.	Foreign		U.S.	Foreign
Subcomponent										
System 1										
Component 1	Component Supplier	Foreign	Any city, Country							
Subcomponent 1.1	Sub Supplier 1.1	U.S.	Any town, State	\$25,000.00	\$0.00	8.1%	0.0%			
Subcomponent 1.2	Sub Supplier 1.2	U.S.	Any town, State	\$35,000.00	\$0.00	11.3%	0.0%			
Subcomponent 1.3	Sub Supplier 1.3	U.S.	Any town, State	\$65,000.00	\$0.00	21.0%	0.0%			
Subcomponent 1.4	Sub Supplier 1.3	Foreign	Any city, Country	\$0.00	\$75,000.00	0.0%	24.2%			
Subcomponent 1.5	Sub Supplier 1.4	U.S.	Any town, State	\$110,000.00	\$0.00	35.5%	0.0%			
Component 1 Material Subtotal				\$235,000.00	\$75,000.00	75.8%	24.2%			
Component 1 Total Cost			(Including Profit & Manufacturing)		\$360,000.00			\$0.00	0.00%	3.75%

STEP 9

In *Component % of Vehicle* columns under *U.S.* and *Foreign* sub-columns, for each component, enter its U.S. and Foreign material cost percentage in relation to the total vehicle content percentage on the row designated *Vehicle Material Total Cost* under *U.S.* and *Foreign* sub-columns as applicable. Calculate the percentage as follows:

- a) If the component has greater than 60% U.S. content
- Then divide the cost on the row designated *U.S. Content* into the row designated *Vehicle Material Total Cost*.
 - There will only be an entry for the *Component % of Vehicle* columns under the *U.S.* sub-column. The *Foreign* sub-column should record zero percentage.

U.S. Content	\$360,000
÷ Vehicle Material Total Cost	\$2,000,000
= U.S. Component % of Vehicle	18.0%

Foreign Content	\$0
÷ Vehicle Material Total Cost	\$2,000,000
= Foreign Component % of Vehicle	0.0%

System (or Group of Components)	Supplier Name	Manufacturing Location (U.S. or Foreign)	Manufacturing Location (if U.S. - City & State; if Foreign - City & Country)	Component and Subcomponent Material Costs		Subcomponent % of Component and Component Total %		U.S. Content (if U.S. % > 60%, entire 100% component cost is counted)	Component % of Vehicle	
Component				U.S.	Foreign	U.S.	Foreign		U.S.	Foreign
Subcomponent										
System 1										
Component 1	Component Supplier	U.S.	Any town, State							
Subcomponent 1.1	Sub Supplier 1.1	U.S.	Any town, State	\$25,000.00	\$0.00	8.1%	0.0%			
Subcomponent 1.2	Sub Supplier 1.2	U.S.	Any town, State	\$35,000.00	\$0.00	11.3%	0.0%			
Subcomponent 1.3	Sub Supplier 1.3	U.S.	Any town, State	\$65,000.00	\$0.00	21.0%	0.0%			
Subcomponent 1.4	Sub Supplier 1.3	Foreign	Any city, Country	\$0.00	\$75,000.00	0.0%	24.2%			
Subcomponent 1.5	Sub Supplier 1.4	U.S.	Any town, State	\$110,000.00	\$0.00	35.5%	0.0%			
Component 1 Material Subtotal				\$235,000.00	\$75,000.00	75.8%	24.2%			
Component 1 Total Cost		(including Profit & Manufacturing)		\$360,000.00				\$360,000.00	18.00%	0.00%

Totals										
Vehicle Material Subtotal				\$1,480,000.00	\$520,000.00				74.00%	26.00%
Vehicle Material Total Cost				\$2,000,000.00						
Vehicle Total Cost (including Profit & Manufacturing)				\$2,200,000.00						

4 DOMESTIC CONTENT CALCULATIONS

b) If the component has less than 60% U.S. content

- First, divide the cost on the row designated *U.S. Content* into row designated *Vehicle Material Total Cost*.

U.S. Content	\$75,000
÷ Vehicle Material Total Cost	\$2,000,000
= U.S. Component % of Vehicle	3.75%

System (or Group of Components)	Supplier Name	Manufacturing Location (U.S. or Foreign)	Manufacturing Location (if U.S. - City & State; if Foreign - City & Country)	Component and Subcomponent Material Costs		Subcomponent % of Component and Component Total %		U.S. Content (if U.S. % < 60%, entire 20% component cost is counted)	Component % of Vehicle	
Component				U.S.	Foreign	U.S.	Foreign		U.S.	Foreign
Subcomponent										
System 1										
Component 1	Component Supplier	U.S.	Any town, State							
Subcomponent 1.1	Sub Supplier 1.1	Foreign	Any city, Country	\$0.00	\$25,000.00	0.0%	8.1%			
Subcomponent 1.2	Sub Supplier 1.2	Foreign	Any city, Country	\$0.00	\$35,000.00	0.0%	11.3%			
Subcomponent 1.3	Sub Supplier 1.3	Foreign	Any city, Country	\$0.00	\$65,000.00	0.0%	21.0%			
Subcomponent 1.4	Sub Supplier 1.4	U.S.	Any town, State	\$75,000.00	\$0.00	24.2%	0.0%			
Subcomponent 1.5	Sub Supplier 1.4	Foreign	Any city, Country	\$0.00	\$110,000.00	0.0%	35.5%			
Component 1 Material Subtotal				\$75,000.00	\$235,000.00	24.2%	75.8%			
Component 1 Total Cost (including Profit & Manufacturing)			\$360,000.00					\$75,000.00	3.75%	11.75%

Totals										
Vehicle Material Subtotal				\$1,480,000.00	\$520,000.00				74.00%	26.00%
Vehicle Material Total Cost				\$2,000,000.00						
Vehicle Total Cost (including Profit & Manufacturing)				\$2,200,000.00						

- Second, divide the cost on the row designated *Foreign Content* into row designated *Vehicle Material Total Cost*. There will be an entry for the *Component % of Vehicle* columns under both the *U.S.* and *Foreign* sub-column.

Foreign Content	\$235,000
÷ Vehicle Material Total Cost	\$2,000,000
= Foreign Component % of Vehicle	11.75%

System (or Group of Components)	Supplier Name	Manufacturing Location (U.S. or Foreign)	Manufacturing Location (if U.S. - City & State; if Foreign - City & Country)	Component and Subcomponent Material Costs		Subcomponent % of Component and Component Total %		U.S. Content (if U.S. % < 60%, entire 20% component cost is counted)	Component % of Vehicle	
Component				U.S.	Foreign	U.S.	Foreign		U.S.	Foreign
Subcomponent										
System 1										
Component 1	Component Supplier	U.S.	Any town, State							
Subcomponent 1.1	Sub Supplier 1.1	Foreign	Any city, Country	\$0.00	\$25,000.00	0.0%	8.1%			
Subcomponent 1.2	Sub Supplier 1.2	Foreign	Any city, Country	\$0.00	\$35,000.00	0.0%	11.3%			
Subcomponent 1.3	Sub Supplier 1.3	Foreign	Any city, Country	\$0.00	\$65,000.00	0.0%	21.0%			
Subcomponent 1.4	Sub Supplier 1.3	U.S.	Any town, State	\$75,000.00	\$0.00	24.2%	0.0%			
Subcomponent 1.5	Sub Supplier 1.4	Foreign	Any city, Country	\$0.00	\$110,000.00	0.0%	35.5%			
Component 1 Material Subtotal				\$75,000.00	\$235,000.00	24.2%	75.8%			
Component 1 Total Cost (including Profit & Manufacturing)			\$360,000.00					\$75,000.00	3.75%	11.75%

Totals										
Vehicle Material Subtotal				\$1,480,000.00	\$520,000.00				74.00%	26.00%
Vehicle Material Total Cost				\$2,000,000.00						
Vehicle Total Cost (including Profit & Manufacturing)				\$2,200,000.00						

4 DOMESTIC CONTENT CALCULATIONS

- c) If a component is 0% U.S. content or if the component is foreign and the U.S. components being incorporated in the foreign component did not receive a tariff exemption
- Then divide the *Foreign Content* into the row designated *Vehicle Total Material Cost*.
 - There will be an entry for the component cost in *Component % of Vehicle* columns and under *Foreign* sub-column and *U.S.* sub-column should read zero percentage.

Foreign Content Total Cost	\$75,000
÷ Vehicle Material Total Cost	\$2,000,000
= Foreign Component % of Vehicle	3.75%

System (or Group of Components)	Supplier Name	Manufacturing Location (U.S. or Foreign)	Manufacturing Location (If U.S. - City & State; If Foreign - City & Country)	Component and Subcomponent Material Costs		Subcomponent % of Component and Component Total %		U.S. Content (If U.S. % > 60%, entire 100% component cost is counted)	Component % of Vehicle		
				U.S.	Foreign	U.S.	Foreign		U.S.	Foreign	
System 1											
Component 1	Component Supplier	Foreign	Any city, Country								
Subcomponent 1.1	Sub Supplier 1.1	U.S.	Any town, State	\$25,000.00	\$0.00	8.1%	0.0%				
Subcomponent 1.2	Sub Supplier 1.2	U.S.	Any town, State	\$35,000.00	\$0.00	11.3%	0.0%				
Subcomponent 1.3	Sub Supplier 1.3	U.S.	Any town, State	\$65,000.00	\$0.00	21.0%	0.0%				
Subcomponent 1.4	Sub Supplier 1.3	Foreign	Any city, Country	\$0.00	\$75,000.00	0.0%	24.2%				
Subcomponent 1.5	Sub Supplier 1.4	U.S.	Any town, State	\$110,000.00	\$0.00	35.5%	0.0%				
Component 1 Material Subtotal				\$235,000.00	\$75,000.00	75.8%	24.2%				
Component 1 Total Cost			(including Profit & Manufacturing)	\$360,000.00				\$0.00	0.00%	3.75%	

Totals										
Vehicle Material Subtotal				\$1,480,000.00	\$520,000.00				74.00%	26.00%
Vehicle Material Total Cost				\$2,000,000.00						
Vehicle Total Cost (including Profit & Manufacturing)				\$2,200,000.00						

STEP 10

Add up all the percentages in the column *Component % of Vehicle* and the corresponding *U.S.* and *Foreign* sub-columns to determine the overall domestic content of the vehicle.

4.4. Special Considerations

This section discusses the best practices for special considerations encountered in the domestic content calculations.

4.4.1. NREs

The following is a list of typical, but not all inclusive, Non-Recurring Expenses (NRE) that will be incurred by the rolling stock manufacturer and for which the manufacturer may provide a breakdown of NREs –

- Mobilization
- Project management
- Procurement
- Engineering
- Design
- Testing
- Quality Assurance
- Rolling Stock Manufacturer miscellaneous labor (other than for final assembly)
- Overhead
- Profit or Gross Margin
- Warranty
- As-built drawings
- Freight or shipping cost from overseas plant
- Miscellaneous

The rolling stock manufacturer should have ready evidence to support verification of each of the above NRE item by the auditor.

4.4.2. Exchange Rates

The Buy America rule 49 CFR § 661.11 (n) states *“The cost of a component of foreign origin is set using the foreign exchange rate at the time the bidder or offeror executes the appropriate Buy America certificate.”*

Therefore, the exchange rate(s) used by the rolling stock manufacturer in its Best and Final Offer price at the time of the contract award shall serve as the basis to calculate the foreign component cost and will be verified by an auditor during the pre-award audit and at the time of signing the Buy America certificate.

The manufacturer shall also use the same exchange rate(s) to calculate the foreign component cost for the post-delivery audit and submit to recipient auditor’s verification.

4.4.3. Transportation Costs

Transportation costs to the U.S. final assembly location must be included in calculating the cost of components and subcomponents. If a component/subcomponent is manufactured outside the U.S., its cost for transportation counts as foreign content (even if a U.S. shipping company or vessel is used).³¹

4.4.4. Tariff Exemptions

If U.S. subcomponents are claimed for foreign manufactured components, the manufacturer should keep on file, for the review by an auditor, the proof of tariff exemption for such items in accordance with 49 CFR § 661.11 (i) and (j). In turn, this requirement refers to the U.S. Code Harmonized Tariff Schedule in 19 U.S.C. 1202, which requires specific declarations/ forms.

In the event that these declarations and/or forms may be difficult to acquire for a Buy America audit, the auditor may accept alternate form(s) of documentation, which proves that the duty was not paid. These may include NAFTA affidavits, Purchase Orders, or letters/emails from responsible parties.

³¹ 49 CFR § 661.11(m)(1).

4.5. Sample Supplier Domestic Content Certification

A Buy America Supplier Certificate should be filled out for any item for which domestic content is being claimed. [Appendix C.5](#) provides a sample Supplier Buy America Certification template for bus and rail vehicles. The Buy America Supplier Certificate is the supplier's certification of their domestic content and U.S. manufacturing for the products being provided for this procurement.

The instructions for completing the certification are as follows:

STEP 1

Fill in the supplier's contact information in the designated space at the top part of the form.

<u>SAMPLE BUY AMERICA SUPPLIER CERTIFICATION</u>	
Supplier:	_____
Address:	_____
Phone:	_____ Fax: _____
Email:	_____

STEP 2

Fill in the contractor's name and contract/purchase order number that connects this certificate to the specific procurement project.

Contractor:	_____
Contract/Purchase Order:	_____

STEP 3

Identify which of the three calculation scenarios apply for each component by checking the respective box.

- a) Check the first box, if the component is manufactured in the U.S. and more than 60% of its subcomponents, by cost, are manufactured in the U.S.
- b) Check the second box, if the component is manufactured in the U.S. and 60% or less of its subcomponents, by cost, is manufactured in the U.S.
- c) Check the third box, if the component is NOT manufactured in the U.S. but does contain U.S. subcomponents for which the supplier has documentation showing tariff exemption.

Calculate the cost of U.S. subcomponents by dividing the cost of U.S. subcomponents by the cost of all subcomponents for each component. **DO NOT** include in this calculation, any NREs such as profit, markups, labor to produce the component and transportation, etc.

Use extra pages as needed to cover all components and subcomponents in the supplier's scope of provision.

This certifies the Supplier's status of compliance with FTA Buy America Regulations set forth in 49 C.F.R § 661.11.

For each component supplied for the Contract, the Supplier attests that (CHECK ONE BOX):

☐	More than 60% of the subcomponents, by cost, are of U.S. origin/manufacture, and is manufactured in the U.S. The Supplier attests that the U.S. content of subcomponents, by cost, is as indicated below.
☐	Less than 60% of the subcomponents, by cost, are of U.S. origin/manufacture, and is manufactured in the U.S. (in such case, the cost of U.S. subcomponents and cost of U.S. manufacturing labor are eligible for inclusion towards domestic content calculations). The Supplier attests that the U.S. content of subcomponents, by cost, is as indicated below.
☐	The component contains subcomponents of domestic origin, however, the component is NOT manufactured in the U.S. (in such case, the cost of U.S. subcomponents and cost of U.S. manufacturing labor are eligible for inclusion towards domestic content calculations). The Supplier attests that the U.S. content of subcomponents, by cost, is as indicated below.

STEP 4

List each component and its (major) subcomponents on the designated rows. Identify Components by name and/or part number traceable to the subject procurement.

- Indicate the manufacturing location for each component and subcomponent in the designated space;
- Indicate the component's percentage of domestic subcomponents for each component in the designated space;
- Indicate each subcomponent's percentage of the component's domestic content in the designated space; the sum of the domestic content percentages of all subcomponents should add up to the total domestic content percentage of the component.

	MANUFACTURING LOCATION	% DOMESTIC CONTENT	% FOREIGN CONTENT
[COMPONENT NAME]	<i>[Location of individual component]</i>	<i>[Total domestic content % of all subcomponents]</i>	<i>[Total content % of all subcomponents]</i>
[SUBCOMPONENT NAME] <i>(use rows for each subcomponent)</i>	<i>[Location of individual subcomponent]</i>	<i>[Total domestic content % of individual subcomponent]</i>	<i>[Total U.S. content % of all subcomponents]</i>
Attach additional sheets as needed			

STEP 5

Sign and date the form by an authorized official of the supplier. Print the name and title of the signatory beneath the signature line.

Information on this form is subject to audit by the Purchaser (i.e., recipient of federal funds, and/or by the FTA and/or its agents).

Date:	_____
Supplier Authorized Signature:	_____
Print Name:	_____
Title:	_____

5. Frequently Asked Questions

This section addresses some of the most frequently asked questions about pre-award and post-delivery audit. This guidance is for information only. The responses do not constitute a determination of compliance with the Department of Transportation (DOT) rules and standards.

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5.1. General

5.1.1. Who must conduct the pre-award and post-delivery audits?

The recipient, or auditor appointed by the recipient, must conduct the audits. The auditor may not be an employee of the manufacturer or its agent. In many instances, a recipient may retain the services of a consultant to conduct the audit.

5.1.2. When should Buy America pre-award audit be conducted?

The law requires that the recipient must conduct a pre-award audit to confirm compliance with Buy America regulations prior to award of the contract. The recipient's executed Pre-award Buy America certificate and Pre-award Purchaser's Requirements certificate must be signed and dated prior to contract award.

5.1.3. When should Buy America post-delivery audit be conducted?

The recipient must conduct a post-delivery audit prior to transfer of title of the rolling stock. The timing of the post-delivery audit is typically identified in the contract documents. "A recipient purchasing revenue service rolling stock with FTA funds must ensure that a post-delivery audit ... is complete before title to the rolling stock" (last vehicle) "is transferred to the recipient."³² However, waiting for the last vehicle may not be a prudent approach because it may be too late to remedy a compliance problem.

The recipient should consider several factors in determining the appropriate time to verify that all material and work performed for the entire contract (including the last vehicle and all change orders) meets the Buy America requirements. A post-delivery audit is often performed just prior to the transfer of title or entry into revenue service of the first vehicle. For small procurements with short delivery periods, an audit conducted at that time may be sufficient. However, the recipient should determine if an audit conducted on the first vehicle is sufficient to verify the actual domestic material content for the entire order. If the post-delivery audit is conducted on the first vehicle, the recipient may need to conduct additional verifications to confirm that the full order satisfies the Buy America requirements particularly if there are changes made in materials or scope after the first post-delivery audit. In certain cases, particularly on large orders with multi-year delivery schedules, recipients may find it appropriate to conduct intermediate audits to minimize the risk that subsequent vehicles the order may not meet Buy America Requirements.

5.1.4. Do pre-award and post-delivery audits have to be conducted for procurements of support vehicles and wayside equipment?

No. The requirement to conduct pre-award and post-delivery audits only applies to rolling stock intended to carry passengers in revenue service, which include buses, vans, cars, railcars,

³² 49 CFR § 663.31

locomotives, trolley cars and buses, ferry boats, and vehicles used for guideways and incline planes (ref. 49 CFR §§ 663.3 and 663.5(e)).

5.1.5. Do support vehicles have to meet the 60% domestic content requirement?

Yes. All rolling stock, including support vehicles, must meet the requirements of the Buy America regulation, namely that final assembly of the rolling stock takes place in the United States, and that greater than 60% of the cost of all components be U.S. manufactured

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5.2. Buy America Compliance Certification

5.2.1. *Must a Buy America certification be conducted for every procurement³³, even if identical vehicles are being purchased from the same contractor year after year?*

Yes. A manufacturer's past compliance with the Buy America Rule does not mean that the manufacturer's products will always be compliant. Changes in design and technical developments, as well as changing suppliers and scope of manufacturing and/or final assembly, may make new products noncompliant. In the case that pre-award and post-delivery audits have been conducted for a given vehicle, the same information may be used to demonstrate compliance at a later date as long as it is verified and documented that there have been no changes made affecting compliance since the last certification.

5.2.2. *Is the 60 percent domestic content threshold calculated as a percentage of the total vehicle price?*

No. The 60 percent domestic content threshold is calculated as a percentage of the total cost of all components, excluding the cost for final assembly of the vehicle. The cost of an individual component is the price a vehicle manufacturer pays a supplier for that component, plus freight-in costs and for foreign components, any applicable duties and transportation costs.

All non-recurring expenses such as engineering, mockups, fixtures/tooling, spare parts, manuals, and training are also excluded from the Buy America component calculations.

5.2.3. *How is the origin of a component determined?*

A component is considered to be of domestic origin if more than 60 percent of its subcomponents, by cost, are of domestic origin and component manufacturing takes place in the United States. If the component meets these requirements, the entire cost of the component may be counted as domestic content in the Buy America calculation of the vehicle.

The cost of an individual subcomponent is the price a component manufacturer pays a supplier for that subcomponent plus freight-in costs and (if foreign) any applicable duties and transportation costs.

If the component is manufactured at the final assembly location, then the component manufacturing and vehicle final assembly must be treated as separate and distinct cost-center activities.

³³ Refers to a single procurement (albeit multi-year), a multi-state procurement, and/or multiple individual procurements by several recipients or sub-recipients.

5.2.4. How is the origin of a subcomponent determined?

Subcomponents manufactured in the United States are considered to be domestic.

Subcomponents manufactured in the United States and exported for inclusion in a component manufactured outside the United States are considered to be of domestic origin if they received a documented tariff exemption for importation back into the United States. If this is the case, then the cost of the subcomponent may be included in the component's domestic content calculation. The cost of the subcomponent at the time of export is the cost that should be used in the calculation. If the subcomponent has not received a tariff exemption, then it may not be included in the domestic content calculation, and will be counted as foreign content.

Raw materials exported for use in a component manufactured outside the United States may not be used in the Buy America calculation.

5.2.5. Do the subcomponents have to be broken down into sub-subcomponents?

No. The Buy America regulation does not extend down to the sub-subcomponent level for Buy America calculation purposes.

5.2.6. Are the costs of both domestic and foreign subcomponents used in The Buy America Domestic Content Calculation for Components?

The entire cost of a component is used in its content calculation. A component is considered domestic if it is manufactured in the United States AND more than 60 percent of the cost of all its subcomponents, by cost, is from subcomponents manufactured in the United States. To perform the calculation, subtract the component's profit, markups, labor to manufacture the component and transportation cost from the component's price, and confirm that more than 60% of the cost of all subcomponents is from U.S. manufactured subcomponents. If this is so, then the entire cost (selling price) of the component can be claimed as domestic content, including its foreign subcomponents.

5.2.7. Do only components of domestic origin contribute towards the domestic Buy America calculations?

No. Domestic subcomponents of components manufactured in the United States that do not contain at least 60 percent domestic subcomponents, by cost, and domestic subcomponents incorporated into foreign-manufactured components that received a tariff exemption for importation back into the United States, may be used in the Buy America domestic content calculation also.

5.2.8. If a component contains less than 60 percent domestic subcomponents, how would it be used in the calculation?

The cost for such a component includes its direct labor costs, domestic direct material costs (domestic subcomponent costs), sales costs, general and administrative costs, and overhead costs associated with manufacturing that component, plus the cost of transporting the component. The cost of its foreign subcomponents must be counted as foreign content.

5.2.9. Can components from foreign sources with domestic subcomponents be used in the calculation?

Yes. If foreign-manufactured components have domestic subcomponents that received a tariff exemption for importation back into the United States, then the cost of those domestic subcomponents may be used in the domestic content calculation. The cost of manufacturing the component, and the overhead costs associated with manufacturing that component, plus the cost of transporting the component, may not be used, because it has been manufactured outside the United States.

5.2.10. How are currency exchange rates addressed for Buy America audits?

The cost of a component of foreign origin is set using the foreign exchange rate at the time the bidder or offeror executes the Buy America certificate. However, large projects with long delivery periods and economic fluctuations can affect material costs between the times of the pre-award and post-delivery audits. In these cases, component and subcomponent costs paid in other than U.S. currency may use exchange rates as of the date of the supplier's executed supplier Buy America certificate. The post-delivery audit needs to verify the actual costs paid to suppliers for all components and subcomponents.

5.2.11. Can systems be components for domestic content calculations? (Examples would be truck assemblies, propulsion system, and brake system.)

No. To assist in identifying components and subcomponents in the context of rolling stock procurements, recipients should refer to Appendices B and C to 49 CFR § 661.11 for a list of components for rolling stock. For components that are not readily identifiable from these Appendices, recipients should contact FTA for clarification.

5.3. Purchaser's Requirements Certification

5.3.1. What is the responsibility of the resident inspector?

A resident inspector is required to visit the manufacturer's final assembly facility during the manufacturing period for purchases of ten or more vehicles intended for revenue passenger service. The inspector must prepare a report summarizing how the construction and operation of the vehicles meet (or do not meet) the terms of the contract and providing accurate records of all vehicle construction activities.

The intent of the requirement³⁴ is to help recipients ensure that the vehicles will comply with their contract specifications. It is not meant to require that a resident inspector remain full-time at the manufacturer's site throughout the period of manufacture. While this may be recommended for some procurements, the resident inspector requirement may be fulfilled by periodic visits.

For example, a recipient may decide to send a resident inspector to the manufacturer's site full-time if the vehicles are of new design or significantly modified. Alternatively, the recipient may send the inspector to the manufacturer's site for several short visits if the manufacturing period is lengthy, or have the resident inspector visit the manufacturer's site less often if identical vehicles have been previously purchased from the same manufacturer. Recipients should be mindful of broader quality control and quality assurance issues so that the selected inspection coverage will not allow defective products to be delivered.

Regardless of the choice of inspection methods, the recipient must ensure that the resident inspector's report satisfies all requirements of the regulations. It is the recipient's responsibility to ensure the vehicles comply with contract specifications and the purpose of the resident inspector's report is to assist the recipient in verifying that the vehicles meet the required specifications.

5.3.2. Where the contract provides for more than one delivery period, must the recipient conduct a post-delivery audit for each delivery period?

Yes. This question addresses the circumstances where a contract provides for multiple deliveries and the delivery periods are scheduled at substantially different time intervals, such as 6 months or 1 year apart. When a contract for vehicles provides for separately scheduled delivery periods, the recipient should complete a post-delivery audit for each period. This does not mean that a separate audit is required for each vehicle within a delivery period.

³⁴ 49 CFR § 663.37.(a)

5.4. FMVSS Certification

5.4.1. Which FMVSS certifications are required?

Title 49 of the Code of Federal Regulations, Part 571 covers the rulings concerning all Federal Motor Vehicle Safety Standards. Examples of the types of FMVSS certifications are included in this handbook in Appendices [C.6](#), [C.7](#), [C.12](#), and [C.13](#)

5.4.2. Must ADA-compliant vehicles be FMVSS certified?

Yes. All motor vehicles that are subject to the FMVSS regulations must be certified to meet the applicable standards.

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Appendix A Domestic Content Calculation Worksheets

A.1 Rail Domestic Content Calculations Worksheet

For instruction on completing the worksheet below, please see [Section 4.3.3 Domestic Content Worksheet Instructions](#). The following worksheet is for sample purposes only. Actual domestic content calculations may require other components and subcomponents. See 49 CFR § 661.11 Rolling stock procurements and this handbook for further information.

SAMPLE BUY AMERICA DOMESTIC CONTENT WORKSHEET FOR RAIL ROLLING STOCK
to calculate domestic and foreign material content for Buy America Audits

System (or Group of Components)	Supplier Name	Manufacturing Location (U.S. or Foreign)	Manufacturing Location (If U.S. - City & State; If Foreign - City & Country)	Component and Subcomponent Material Costs		Subcomponent % of Component and Component Total %		U.S. Content (If U.S. %>60% entire 100% component cost is counted)	Component % of Vehicle	
Component				U.S.	Foreign	U.S.	Foreign		U.S.	Foreign
Subcomponent										
* COMPONENTS DEFINED IN 49 CFR 661 APPENDIX C - TYPICAL COMPONENTS OF RAIL ROLLING STOCK *										
Car Shells										
* Car Shells *	Component Supplier	Foreign	Any city, Country							
Underframe	Sub Supplier 1.1	Foreign	Any city, Country	\$0.00	\$120,186.00	0.0%	37.5%			
Sideframe	Sub Supplier 1.2	Foreign	Any city, Country	\$0.00	\$58,050.00	0.0%	18.1%			
Roof	Sub Supplier 1.3	Foreign	Any city, Country	\$0.00	\$30,207.60	0.0%	9.4%			
End Frame	Sub Supplier 1.3	Foreign	Any city, Country	\$0.00	\$76,050.00	0.0%	23.8%			
Front End Bonnet (Fiberglass)	Sub Supplier 1.4	U.S.	Any town, State	\$35,607.60	\$0.00	11.1%	0.0%			
Car Body Shells Material Subtotal				\$35,607.60	\$284,493.60	11.1%	88.9%			
Car Body Shells Total Cost		(including Profit & Manufacturing)		\$352,111.32				\$0.00	0.00%	13.62%
Propulsion System										
* Engines *										
				\$0.00	\$0.00	#DIV/0!	#DIV/0!			
				\$0.00	\$0.00	#DIV/0!	#DIV/0!			
				\$0.00	\$0.00	#DIV/0!	#DIV/0!			
Engines Material Subtotal				\$0.00	\$0.00	#DIV/0!	#DIV/0!			
Engines Total Cost		(including Profit & Manufacturing)		\$0.00				\$0.00	0.00%	0.00%
* Main Transformer *	Component Supplier	U.S.	Any town, State							
Subcomponent 1.1	Sub Supplier 1.1	U.S.	Any town, State	\$30,022.40	\$0.00	81.1%	0.0%			
Subcomponent 1.2	Sub Supplier 1.2	U.S.	Any town, State	\$7,000.00	\$0.00	18.9%	0.0%			
Main Transformer Material Subtotal				\$37,022.40	\$0.00	100.0%	0.0%			
Main Transformer Total Cost		(including Profit & Manufacturing)		\$40,724.64				\$40,724.64	1.95%	0.00%
* Pantographs *	Component Supplier	U.S.	Any town, State							
Pantograph Control Panel	Sub Supplier 1.1	U.S.	Any town, State	\$1,469.70	\$0.00	7.3%	0.0%			
Collector Head Assemblies	Sub Supplier 1.2	U.S.	Any town, State	\$5,659.56	\$0.00	28.0%	0.0%			
Collector Raising Assemblies	Sub Supplier 1.3	U.S.	Any town, State	\$5,684.40	\$0.00	28.1%	0.0%			
Lowering Device	Sub Supplier 1.4	U.S.	Any town, State	\$5,877.00	\$0.00	29.1%	0.0%			
Pantograph Pole	Sub Supplier 1.5	U.S.	Any town, State	\$173.16	\$0.00	0.9%	0.0%			
Carbon Shoe	Sub Supplier 1.6	U.S.	Any town, State	\$1,361.16	\$0.00	6.7%	0.0%			
Pantograph Material Subtotal				\$20,224.98	\$0.00	100.0%	0.0%			
Pantograph Total Cost		(including Profit & Manufacturing)		\$22,247.48				\$22,247.48	1.06%	0.00%

APPENDIX A

Domestic Content Calculation Worksheets

SAMPLE BUY AMERICA DOMESTIC CONTENT WORKSHEET FOR RAIL ROLLING STOCK

to calculate domestic and foreign material content for Buy America Audits

System (or Group of Components)	Supplier Name	Manufacturing Location (U.S. or Foreign)	Manufacturing Location (If U.S. - City & State; If Foreign - City & Country)	Component and Subcomponent Material Costs		Subcomponent % of Component and Component Total %		U.S. Content (If U.S. % > 60%, entire 100% component cost is counted)	Component % of Vehicle	
Component				U.S.	Foreign	U.S.	Foreign		U.S.	Foreign
Subcomponent										
* COMPONENTS DEFINED IN 49 CFR 661 APPENDIX C - TYPICAL COMPONENTS OF RAIL ROLLING STOCK *										
Propulsion System										
* Traction Motors *	Component Supplier	U.S.	Any town, State							
Stator Windings	Sub Supplier 1.1	Foreign	Any city, Country	\$0.00	\$15,258.60	0.0%	27.9%			
Traction Motor Housing	Sub Supplier 1.2	U.S.	Any town, State	\$13,240.80	\$0.00	24.3%	0.0%			
Laminations	Sub Supplier 1.3	U.S.	Any town, State	\$4,676.40	\$0.00	8.6%	0.0%			
Bearings	Sub Supplier 1.4	U.S.	Any town, State	\$5,999.40	\$0.00	11.0%	0.0%			
Armature	Sub Supplier 1.5	Foreign	Any city, Country	\$0.00	\$15,418.80	0.0%	28.2%			
Traction Motor Material Subtotal				\$23,916.60	\$30,677.40	43.8%	56.2%			
Traction Motor Total Cost	(including Profit & Manufacturing)		\$60,053.40					\$23,916.60	1.14%	1.47%
Traction Motor Cooling Equipment	Component Supplier	U.S.	Any town, State							
Subcomponent 1.1	Sub Supplier 1.1	U.S.	Any town, State	\$10,041.40	\$0.00	55.7%	0.0%			
Subcomponent 1.2	Sub Supplier 1.2	U.S.	Any town, State	\$8,000.00	\$0.00	44.3%	0.0%			
TM Cooling Equipment Material Subtotal				\$18,041.40	\$0.00	100.0%	0.0%			
TM Cooling Equipment Total Cost	(including Profit & Manufacturing)		\$19,845.54					\$19,845.54	0.95%	0.00%
* Propulsion Gear Boxes *	Component Supplier	U.S.	Any town, State							
Gear Box Housing	Sub Supplier 1.1	U.S.	Any town, State	\$35,337.60	\$0.00	62.6%	0.0%			
Misc. Gear Subcomponents	Sub Supplier 1.2	U.S.	Any town, State	\$9,878.40	\$0.00	17.5%	0.0%			
Bearings & Seals	Sub Supplier 1.3	U.S.	Any town, State	\$11,259.00	\$0.00	19.9%	0.0%			
Propulsion Gear Box Material Subtotal				\$56,475.00	\$0.00	100.0%	0.0%			
Propulsion Gear Box Total Cost	(including Profit & Manufacturing)		\$62,122.50					\$62,122.50	2.97%	0.00%
* Acceleration and Braking Resistors *	Component Supplier	U.S.	Any town, State							
Subcomponent 1.1	Sub Supplier 1.1	U.S.	Any town, State	\$30,045.00	\$0.00	83.4%	0.0%			
Subcomponent 1.2	Sub Supplier 1.2	Foreign	Any city, Country	\$0.00	\$6,000.00	0.0%	16.6%			
Resistors Material Subtotal				\$30,045.00	\$6,000.00	83.4%	16.6%			
Resistors Total Cost	(including Profit & Manufacturing)		\$39,649.50					\$39,649.50	1.90%	0.00%
Knife Switch	Component Supplier	Foreign w/ Tariff Ex	Any town, State							
Subcomponent 1.1	Sub Supplier 1.1	U.S.	Any town, State	\$8,212.40	\$0.00	89.1%	0.0%			
Subcomponent 1.2	Sub Supplier 1.2	Foreign	Any city, Country	\$0.00	\$1,000.00	0.0%	10.9%			
Knife Switch Material Subtotal				\$8,212.40	\$1,000.00	89.1%	10.9%			
Knife Switch Total Cost	(including Profit & Manufacturing)		\$10,133.64					\$8,212.40	0.39%	0.09%
Speed Sensors	Component Supplier	Foreign w/ Tariff Ex	Any town, State							
Subcomponent 1.1	Sub Supplier 1.1	U.S.	Any town, State	\$2,836.60	\$0.00	58.6%	0.0%			
Subcomponent 1.2	Sub Supplier 1.2	Foreign	Any city, Country	\$0.00	\$2,000.00	0.0%	41.4%			
Speed Sensors Material Subtotal				\$2,836.60	\$2,000.00	58.6%	41.4%			
Speed Sensors Total Cost	(including Profit & Manufacturing)		\$5,320.26					\$2,836.60	0.14%	0.12%
Master Controller	Component Supplier	Foreign w/ Tariff Ex	Any town, State							
Subcomponent 1.1	Sub Supplier 1.1	U.S.	Any town, State	\$1,521.60	\$0.00	33.7%	0.0%			
Subcomponent 1.2	Sub Supplier 1.2	Foreign	Any city, Country	\$0.00	\$3,000.00	0.0%	66.3%			
Master Controller Material Subtotal				\$1,521.60	\$3,000.00	33.7%	66.3%			
Master Controller Total Cost	(including Profit & Manufacturing)		\$4,973.76					\$1,521.60	0.07%	0.17%

SAMPLE BUY AMERICA DOMESTIC CONTENT WORKSHEET FOR RAIL ROLLING STOCK

to calculate domestic and foreign material content for Buy America Audits

System (or Group of Components)	Supplier Name	Manufacturing Location (U.S. or Foreign)	Manufacturing Location (If U.S. - City & State; If Foreign - City & Country)	Component and Subcomponent Material Costs		Subcomponent % of Component and Component Total %		U.S. Content (If U.S. % > 60%, entire 100% component cost is counted)	Component % of Vehicle	
Component				U.S.	Foreign	U.S.	Foreign		U.S.	Foreign
Subcomponent										

* COMPONENTS DEFINED IN 49 CFR 661 APPENDIX C - TYPICAL COMPONENTS OF RAIL ROLLING STOCK *

Propulsion System										
Lightning Arrestor	<i>Component Supplier</i>	U.S.	Any town, State							
Subcomponent 1.1	Sub Supplier 1.1	U.S.	Any town, State	\$3,563.90	\$0.00	78.1%	0.0%			
Subcomponent 1.2	Sub Supplier 1.2	Foreign	Any city, Country	\$0.00	\$1,000.00	0.0%	21.9%			
Lightning Arrestor Material Subtotal				\$3,563.90	\$1,000.00	78.1%	21.9%			
Lightning Arrestor Total Cost	(including Profit & Manufacturing)		\$5,020.29					\$5,020.29	0.24%	0.00%
* Propulsion Controls *	<i>Component Supplier</i>	U.S.	Any town, State							
Subcomponent 1.1	Sub Supplier 1.1	U.S.	Any town, State	\$100,978.40	\$0.00	80.2%	0.0%			
Subcomponent 1.2	Sub Supplier 1.2	Foreign	Any city, Country	\$0.00	\$25,000.00	0.0%	19.8%			
Propulsion Controls Material Subtotal				\$100,978.40	\$25,000.00	80.2%	19.8%			
Propulsion Controls Total Cost	(including Profit & Manufacturing)		\$138,576.24					\$138,576.24	6.63%	0.00%
High Speed Circuit Breaker	<i>Component Supplier</i>	Foreign	Any city, Country							
Subcomponent 1.1	Sub Supplier 1.1	Foreign	Any city, Country	\$0.00	\$7,425.80	0.0%	88.1%			
Subcomponent 1.2	Sub Supplier 1.2	Foreign	Any city, Country	\$0.00	\$1,000.00	0.0%	11.9%			
High Speed Circuit Breaker Material Subtotal				\$0.00	\$8,425.80	0.0%	100.0%			
High Speed Circuit Breaker Total Cost	(including Profit & Manufacturing)		\$9,268.38					\$0.00	0.00%	0.40%

* Interior Linings *										
Interior Passenger Area Side Liners	<i>Component Supplier</i>	U.S.	Any town, State							
Subcomponent 1.1	Sub Supplier 1.1	U.S.	Any town, State	\$45,999.00	\$0.00	100.0%	0.0%			
Interior Side Liners Material Subtotal				\$45,999.00	\$0.00	100.0%	0.0%			
Interior Side Liners Total Cost	(including Profit & Manufacturing)		\$50,598.90					\$50,598.90	2.42%	0.00%
Interior Passenger Area Roof Liners	<i>Component Supplier</i>	U.S.	Any town, State							
Subcomponent 1.1	Sub Supplier 1.1	U.S.	Any town, State	\$17,741.34	\$0.00	100.0%	0.0%			
Interior Roof Liners Material Subtotal				\$17,741.34	\$0.00	100.0%	0.0%			
Interior Roof Liners Total Cost	(including Profit & Manufacturing)		\$19,515.47					\$19,515.47	0.93%	0.00%
Operator Cab Area Liners	<i>Component Supplier</i>	U.S.	Any town, State							
Subcomponent 1.1	Sub Supplier 1.1	U.S.	Any town, State	\$8,920.80	\$0.00	100.0%	0.0%			
Operator Cab Liners Material Subtotal				\$8,920.80	\$0.00	100.0%	0.0%			
Operator Cab Liners Total Cost	(including Profit & Manufacturing)		\$9,812.88					\$9,812.88	0.47%	0.00%
Interior Wind Screens	<i>Component Supplier</i>	U.S.	Any town, State							
Subcomponent 1.1	Sub Supplier 1.1	U.S.	Any town, State	\$9,048.24	\$0.00	100.0%	0.0%			
Interior Wind Screens Material Subtotal				\$9,048.24	\$0.00	100.0%	0.0%			
Interior Wind Screens Total Cost	(including Profit & Manufacturing)		\$9,953.06					\$9,953.06	0.48%	0.00%
Window Masks Liners	<i>Component Supplier</i>	U.S.	Any town, State							
Subcomponent 1.1	Sub Supplier 1.1	U.S.	Any town, State	\$38,082.60	\$0.00	100.0%	0.0%			
Window Masks Liners Material Subtotal				\$38,082.60	\$0.00	100.0%	0.0%			
Window Masks Liners Total Cost	(including Profit & Manufacturing)		\$41,890.86					\$41,890.86	2.01%	0.00%

SAMPLE BUY AMERICA DOMESTIC CONTENT WORKSHEET FOR RAIL ROLLING STOCK

to calculate domestic and foreign material content for Buy America Audits

System (or Group of Components)	Supplier Name	Manufacturing Location (U.S. or Foreign)	Manufacturing Location (If U.S. - City & State; if Foreign - City & Country)	Component and Subcomponent Material Costs		Subcomponent % of Component and Component Total %		U.S. Content (If U.S. % > 60%, entire 100% component cost is counted)	Component % of Vehicle	
Component				U.S.	Foreign	U.S.	Foreign		U.S.	Foreign
Subcomponent										

* COMPONENTS DEFINED IN 49 CFR 661 APPENDIX C - TYPICAL COMPONENTS OF RAIL ROLLING STOCK *

* Low Voltage Auxiliary Power Supplies *

Low Voltage Power Supply	Component Supplier	U.S.	Any town, State							
Subcomponent 1.1	Sub Supplier 1.1	U.S.	Any town, State	\$18,102.60	\$0.00	100.0%	0.0%			
Low Voltage Power Supply Material Subtotal				\$18,102.60	\$0.00	100.0%	0.0%			
Low Voltage Power Supply Total Cost	(including Profit & Manufacturing)		\$19,912.86					\$19,912.86	0.95%	0.00%
Auxiliary Inverter	Component Supplier	Foreign	Any city, Country							
Subcomponent 1.1	Sub Supplier 1.1	Foreign	Any city, Country	\$0.00	\$53,436.60	0.0%	100.0%			
Auxiliary Inverter Material Subtotal				\$0.00	\$53,436.60	0.0%	100.0%			
Auxiliary Inverter Total Cost	(including Profit & Manufacturing)		\$58,780.26					\$0.00	0.00%	2.56%
Battery	Component Supplier	U.S.	Any town, State							
Case	Sub Supplier 1.1	U.S.	Any town, State	\$76.45	\$0.00	74.8%	0.0%			
Plates	Sub Supplier 1.2	U.S.	Any town, State	\$25.74	\$0.00	25.2%	0.0%			
Battery Material Subtotal				\$102.19	\$0.00	100.0%	0.0%			
Battery Total Cost	(including Profit & Manufacturing)		\$117.09					\$117.09	0.01%	0.00%
Battery Box	Component Supplier	U.S.	Any town, State							
Battery Enclosure/Tray	Sub Supplier 1.1	U.S.	Any town, State	\$5,070.60	\$0.00	84.4%	0.0%			
Battery Hold Downs	Sub Supplier 1.2	U.S.	Any town, State	\$936.22	\$0.00	15.6%	0.0%			
Battery Box Material Subtotal				\$6,006.82	\$0.00	100.0%	0.0%			
Battery Box Total Cost	(including Profit & Manufacturing)		\$6,607.51					\$6,607.51	0.32%	0.00%

* Air Conditioning Equipment *

HVAC Unit	Component Supplier	Foreign	Any city, Country							
Air Compressor & Motors	Sub Supplier 1.1	Foreign	Any city, Country	\$0.00	\$48,366.00	0.0%	95.4%			
Metal Frame	Sub Supplier 1.2	Foreign	Any city, Country	\$0.00	\$1,642.32	0.0%	3.2%			
Indicator Panels	Sub Supplier 1.3	Foreign	Any city, Country	\$0.00	\$686.52	0.0%	1.4%			
HVAC Unit Material Subtotal				\$0.00	\$50,694.84	0.0%	100.0%			
HVAC Unit Total Cost	(including Profit & Manufacturing)		\$55,764.32					\$0.00	0.00%	2.43%
Floor Heaters	Component Supplier	Foreign	Any city, Country							
Heating Strips	Sub Supplier 1.1	Foreign	Any city, Country	\$0.00	\$8,679.60	0.0%	57.1%			
Heater Guards	Sub Supplier 1.2	Foreign	Any city, Country	\$0.00	\$6,231.60	0.0%	41.0%			
Wiring	Sub Supplier 1.3			\$0.00	\$289.98	0.0%	1.9%			
Floor Heaters Material Subtotal				\$0.00	\$15,201.18	0.0%	100.0%			
Floor Heaters Total Cost	(including Profit & Manufacturing)		\$16,721.30					\$0.00	0.00%	0.73%
Threshold Heaters	Component Supplier	U.S.	Any town, State							
Heating Strips	Sub Supplier 1.1	U.S.	Any town, State	\$633.60	\$0.00	24.3%	0.0%			
Wiring	Sub Supplier 1.3	U.S.	Any town, State	\$274.68	\$0.00	10.5%	0.0%			
Threshold Plate	Sub Supplier 1.4	U.S.	Any town, State	\$1,701.00	\$0.00	65.2%	0.0%			
Threshold Heaters Material Subtotal				\$2,609.28	\$0.00	100.0%	0.0%			
Threshold Heaters Total Cost	(including Profit & Manufacturing)		\$3,934.85					\$3,934.85	0.19%	0.00%

SAMPLE BUY AMERICA DOMESTIC CONTENT WORKSHEET FOR RAIL ROLLING STOCK

to calculate domestic and foreign material content for Buy America Audits

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Component				U.S.	Foreign	U.S.	Foreign		U.S.	Foreign
Subcomponent										

* COMPONENTS DEFINED IN 49 CFR 661 APPENDIX C - TYPICAL COMPONENTS OF RAIL ROLLING STOCK *

* Air Conditioning Equipment *										
Cab Heaters	<i>Component Supplier</i>	<i>Foreign</i>	<i>Any town, State</i>							
Heater Housing	Sub Supplier 1.1	Foreign	Any city, Country	\$0.00	\$591.84	0.0%	60.7%			
Heater	Sub Supplier 1.2	Foreign	Any city, Country	\$0.00	\$184.50	0.0%	18.9%			
Blower Motor	Sub Supplier 1.3	Foreign	Any city, Country	\$0.00	\$162.18	0.0%	16.6%			
Wiring	Sub Supplier 1.4	Foreign	Any city, Country	\$0.00	\$36.00	0.0%	3.7%			
Cab Heaters Material Subtotal				\$0.00	\$974.52	0.0%	100.0%			
Cab Heaters Total Cost	<i>(Including Profit & Manufacturing)</i>		\$1,071.97					\$0.00	0.00%	0.05%
HVAC Controls	<i>Component Supplier</i>	<i>Foreign</i>	<i>Any city, Country</i>							
Subcomponent 1.1	Sub Supplier 1.1	Foreign	Any city, Country	\$0.00	\$44,766.00	0.0%	100.0%			
HVAC Controls Material Subtotal				\$0.00	\$44,766.00	0.0%	100.0%			
HVAC Controls Total Cost	<i>(Including Profit & Manufacturing)</i>		\$49,242.60					\$0.00	0.00%	2.14%
HVAC Thermostats	<i>Component Supplier</i>	<i>U.S.</i>	<i>Any town, State</i>							
Subcomponent 1.1	Sub Supplier 1.1	U.S.	Any town, State	\$873.00	\$0.00	65.3%	0.0%			
Temperature Sensors	Sub Supplier 1.2	U.S.	Any town, State	\$464.04	\$0.00	34.7%	0.0%			
HVAC Thermostats Material Subtotal				\$1,337.04	\$0.00	100.0%	0.0%			
HVAC Thermostats Total Cost	<i>(Including Profit & Manufacturing)</i>		\$1,470.74					\$1,470.74	0.07%	0.00%

Friction Brake System										
* Air Brake Compressors *	<i>Component Supplier</i>	<i>U.S.</i>	<i>Any town, State</i>							
Subcomponent 1.1	Sub Supplier 1.1	U.S.	Any town, State	\$17,373.60	\$0.00	100.0%	0.0%			
Air Brake Compressor Material Subtotal				\$17,373.60	\$0.00	100.0%	0.0%			
Air Brake Compressor Total Cost	<i>(Including Profit & Manufacturing)</i>		\$19,110.96					\$19,110.96	0.91%	0.00%
* Foundation Brake Equipment *	<i>Component Supplier</i>	<i>U.S.</i>	<i>Any town, State</i>							
Subcomponent 1.1	Sub Supplier 1.1	U.S.	Any town, State	\$2,277.00	\$0.00	100.0%	0.0%			
Foundation Brake Equipment Material Subtotal				\$2,277.00	\$0.00	100.0%	0.0%			
Foundation Brake Equipment Total Cost	<i>(Including Profit & Manufacturing)</i>		\$2,504.70					\$2,504.70	0.12%	0.00%
* Brake Controls *	<i>Component Supplier</i>	<i>U.S.</i>	<i>Any town, State</i>							
Subcomponent 1.1	Sub Supplier 1.1	U.S.	Any town, State	\$38,808.00	\$0.00	100.0%	0.0%			
Brake Controls Material Subtotal				\$38,808.00	\$0.00	100.0%	0.0%			
Brake Controls Total Cost	<i>(Including Profit & Manufacturing)</i>		\$42,688.80					\$42,688.80	2.04%	0.00%
Air Reservoir - Main	<i>Component Supplier</i>	<i>U.S.</i>	<i>Any town, State</i>							
Subcomponent 1.1	Sub Supplier 1.1	U.S.	Any town, State	\$10,598.40	\$0.00	100.0%	0.0%			
Air Reservoir - Main Material Subtotal				\$10,598.40	\$0.00	100.0%	0.0%			
Air Reservoir - Main Total Cost	<i>(Including Profit & Manufacturing)</i>		\$11,658.24					\$11,658.24	0.56%	0.00%
Air Reservoir - Auxiliary	<i>Component Supplier</i>	<i>U.S.</i>	<i>Any town, State</i>							
Subcomponent 1.1	Sub Supplier 1.1	U.S.	Any town, State	\$10,569.60	\$0.00	100.0%	0.0%			
Air Reservoir - Auxiliary Material Subtotal				\$10,569.60	\$0.00	100.0%	0.0%			
Air Reservoir - Auxiliary Total Cost	<i>(Including Profit & Manufacturing)</i>		\$11,626.56					\$11,626.56	0.56%	0.00%

SAMPLE BUY AMERICA DOMESTIC CONTENT WORKSHEET FOR RAIL ROLLING STOCK

to calculate domestic and foreign material content for Buy America Audits

System (or Group of Components)	Supplier Name	Manufacturing Location (U.S. or Foreign)	Manufacturing Location (if U.S. - City & State; if Foreign - City & Country)	Component and Subcomponent Material Costs		Subcomponent % of Component and Component Total %		U.S. Content (if U.S. % >60% entire 100% component cost is counted)	Component % of Vehicle	
Component				U.S.	Foreign	U.S.	Foreign		U.S.	Foreign
Subcomponent										

* COMPONENTS DEFINED IN 49 CFR 661 APPENDIX C - TYPICAL COMPONENTS OF RAIL ROLLING STOCK *

Friction Brake System										
Supply Reservoir	Component Supplier	U.S.	Any town, State							
Subcomponent 1.1	Sub Supplier 1.1	U.S.	Any town, State	\$3,564.00	\$0.00	100.0%	0.0%			
Supply Reservoir Material Subtotal				\$3,564.00	\$0.00	100.0%	0.0%			
Supply Reservoir Total Cost	(including Profit & Manufacturing)		\$3,920.40					\$3,920.40	0.19%	0.00%
Disc Brake Unit	Component Supplier	U.S.	Any town, State							
Subcomponent 1.1	Sub Supplier 1.1	U.S.	Any town, State	\$1,773.90	\$0.00	100.0%	0.0%			
Disc Brake Unit Material Subtotal				\$1,773.90	\$0.00	100.0%	0.0%			
Disc Brake Unit Total Cost	(including Profit & Manufacturing)		\$1,951.29					\$1,951.29	0.09%	0.00%
Gauges	Component Supplier	U.S.	Any town, State							
Subcomponent 1.1	Sub Supplier 1.1	U.S.	Any town, State	\$997.20	\$0.00	100.0%	0.0%			
Gauges Material Subtotal				\$997.20	\$0.00	100.0%	0.0%			
Gauges Total Cost	(including Profit & Manufacturing)		\$1,096.92					\$1,096.92	0.05%	0.00%
Speed Sensor	Component Supplier	U.S.	Any town, State							
Subcomponent 1.1	Sub Supplier 1.1	U.S.	Any town, State	\$696.60	\$0.00	100.0%	0.0%			
Speed Sensor Material Subtotal				\$696.60	\$0.00	100.0%	0.0%			
Speed Sensor Total Cost	(including Profit & Manufacturing)		\$766.26					\$766.26	0.04%	0.00%

* Articulation Assemblies *										
Joint Assembly	Component Supplier	Foreign	Any city, Country							
Articulation Joint	Sub Supplier 1.1	Foreign	Any city, Country	\$0.00	\$12,000.00	0.0%	54.5%			
Deck Plates	Sub Supplier 1.2	Foreign	Any city, Country	\$0.00	\$5,000.00	0.0%	22.7%			
Pistons	Sub Supplier 1.3	Foreign	Any city, Country	\$0.00	\$5,000.00	0.0%	22.7%			
Joint Assembly Material Subtotal				\$0.00	\$22,000.00	0.0%	100.0%			
Joint Assembly Total Cost	(including Profit & Manufacturing)		\$24,534.43					\$0.00	0.00%	1.05%
Bellows	Component Supplier	Foreign	Any city, Country							
Bows	Sub Supplier 1.1	Foreign	Any city, Country	\$0.00	\$5,000.00	0.0%	45.5%			
Fabric	Sub Supplier 1.2	Foreign	Any city, Country	\$0.00	\$6,000.00	0.0%	54.5%			
Bellows Material Subtotal				\$0.00	\$11,000.00	0.0%	100.0%			
Bellows Total Cost	(including Profit & Manufacturing)		\$12,423.51					\$0.00	0.00%	0.53%

SAMPLE BUY AMERICA DOMESTIC CONTENT WORKSHEET FOR RAIL ROLLING STOCK

to calculate domestic and foreign material content for Buy America Audits

System (or Group of Components)	Supplier Name	Manufacturing Location (U.S. or Foreign)	Manufacturing Location (If U.S. - City & State; if Foreign - City & Country)	Component and Subcomponent Material Costs		Subcomponent % of Component and Component Total %		U.S. Content (If U.S. % > 60%, entire 100% component cost is counted)	Component % of Vehicle	
Component				U.S.	Foreign	U.S.	Foreign		U.S.	Foreign
Subcomponent										

* COMPONENTS DEFINED IN 49 CFR 661 APPENDIX C - TYPICAL COMPONENTS OF RAIL ROLLING STOCK *

* Train Control Systems *

Train to Wayside Communication Equipment	Component Supplier	U.S.	Any town, State							
Subcomponent 1.1	Sub Supplier 1.1	U.S.	Any town, State	\$25,233.20	\$0.00	71.6%	0.0%			
Subcomponent 1.2	Sub Supplier 1.2	U.S.	Any town, State	\$10,000.00	\$0.00	28.4%	0.0%			
TWC Material Subtotal				\$35,233.20	\$0.00	100.0%	0.0%			
TWC Total Cost	(including Profit & Manufacturing)		\$38,756.52					\$38,756.52	1.86%	0.00%
Automatic Train Protection (ATP) Module	Component Supplier	U.S.	Any town, State							
Subcomponent 1.1	Sub Supplier 1.1	U.S.	Any town, State	\$2,627.80	\$0.00	56.8%	0.0%			
Subcomponent 1.2	Sub Supplier 1.2	U.S.	Any town, State	\$2,000.00	\$0.00	43.2%	0.0%			
ATP Module Material Subtotal				\$4,627.80	\$0.00	100.0%	0.0%			
ATP Module Total Cost	(including Profit & Manufacturing)		\$4,730.58					\$4,730.58	0.23%	0.00%
Automatic Train Control (ATC) Module	Component Supplier	Foreign	Any city, Country							
Subcomponent 1.1	Sub Supplier 1.1	Foreign	Any city, Country	\$0.00	\$1,008.02	0.0%	59.0%			
Subcomponent 1.2	Sub Supplier 1.2	Foreign	Any city, Country	\$0.00	\$700.00	0.0%	41.0%			
ATC Module Material Subtotal				\$0.00	\$1,708.02	0.0%	100.0%			
ATC Module Total Cost	(including Profit & Manufacturing)		\$1,878.82					\$0.00	0.00%	0.08%

* Window Assemblies *

Passenger Side Windows	Component Supplier	U.S.	Any town, State							
Glazing	Sub Supplier 1.1	U.S.	Any town, State	\$5,682.60	\$0.00	51.8%	0.0%			
Seal	Sub Supplier 1.2	U.S.	Any town, State	\$1,771.74	\$0.00	16.1%	0.0%			
Frame	Sub Supplier 1.3	U.S.	Any town, State	\$3,524.04	\$0.00	32.1%	0.0%			
Passenger Side Windows Material Subtotal				\$10,978.38	\$0.00	100.0%	0.0%			
Passenger Side Windows Total Cost	(including Profit & Manufacturing)		\$12,076.22					\$12,076.22	0.58%	0.00%
Windshield	Component Supplier	U.S.	Any town, State							
Subcomponent 1.1	Sub Supplier 1.1	U.S.	Any town, State	\$6,856.60	\$0.00	57.8%	0.0%			
Subcomponent 1.2	Sub Supplier 1.2	U.S.	Any town, State	\$5,000.00	\$0.00	42.2%	0.0%			
Windshield Material Subtotal				\$11,856.60	\$0.00	100.0%	0.0%			
Windshield Total Cost	(including Profit & Manufacturing)		\$13,042.26					\$13,042.26	0.62%	0.00%
Operator Cab Windows	Component Supplier	U.S.	Any town, State							
Subcomponent 1.1	Sub Supplier 1.1	U.S.	Any town, State	\$4,857.80	\$0.00	54.8%	0.0%			
Subcomponent 1.2	Sub Supplier 1.2	U.S.	Any town, State	\$4,000.00	\$0.00	45.2%	0.0%			
Operator Cab Windows Material Subtotal				\$8,857.80	\$0.00	100.0%	0.0%			
Operator Cab Windows Total Cost	(including Profit & Manufacturing)		\$9,743.58					\$9,743.58	0.47%	0.00%
Emergency Windows	Component Supplier	U.S.	Any town, State							
Frame	Sub Supplier 1.1	U.S.	Any town, State	\$3,524.04	\$0.00	28.8%	0.0%			
Glazing	Sub Supplier 1.2	U.S.	Any town, State	\$5,682.60	\$0.00	46.5%	0.0%			
Seal with Removable Strip and Handle	Sub Supplier 1.3	U.S.	Any town, State	\$2,771.74	\$0.00	22.7%	0.0%			
Decals	Sub Supplier 1.4	U.S.	Any town, State	\$242.96	\$0.00	2.0%	0.0%			
Emergency Windows Material Subtotal				\$12,221.34	\$0.00	100.0%	0.0%			
Emergency Windows Total Cost	(including Profit & Manufacturing)		\$14,062.86					\$14,062.86	0.67%	0.00%

SAMPLE BUY AMERICA DOMESTIC CONTENT WORKSHEET FOR RAIL ROLLING STOCK

to calculate domestic and foreign material content for Buy America Audits

System (or Group of Components)	Supplier Name	Manufacturing Location (U.S. or Foreign)	Manufacturing Location (If U.S. - City & State; If Foreign - City & Country)	Component and Subcomponent Material Costs		Subcomponent % of Component and Component Total %		U.S. Content (If U.S. % > 60%, entire 100% component cost is counted)	Component % of Vehicle	
Component				U.S.	Foreign	U.S.	Foreign		U.S.	Foreign
Subcomponent										
* COMPONENTS DEFINED IN 49 CFR 661 APPENDIX C - TYPICAL COMPONENTS OF RAIL ROLLING STOCK *										
* Communication Equipment *										
Public Address (PA) Equipment	Component Supplier	U.S.	Any town, State							
Subcomponent 1.1	Sub Supplier 1.1	U.S.	Any town, State	\$4,617.00	\$0.00	90.9%	0.0%			
Subcomponent 1.2	Sub Supplier 1.2	U.S.	Any town, State	\$462.60	\$0.00	9.1%	0.0%			
PA Equipment Material Subtotal				\$5,079.60	\$0.00	100.0%	0.0%			
PA Equipment Total Cost	(including Profit & Manufacturing)		\$5,587.56					\$5,587.56	0.27%	0.00%
Train Operator Display	Component Supplier	Foreign	Any city, Country							
Subcomponent 1.1	Sub Supplier 1.1	Foreign	Any city, Country	\$0.00	\$7,560.80	0.0%	88.3%			
Subcomponent 1.2	Sub Supplier 1.2	Foreign	Any city, Country	\$0.00	\$1,000.00	0.0%	11.7%			
Train Operator Display Material Subtotal				\$0.00	\$8,560.80	0.0%	100.0%			
Train Operator Display Total Cost	(including Profit & Manufacturing)		\$9,416.88					\$0.00	0.00%	0.41%
Security Camera Equipment	Component Supplier	U.S.	Any town, State							
Subcomponent 1.1	Sub Supplier 1.1	U.S.	Any town, State	\$17,137.80	\$0.00	98.3%	0.0%			
Subcomponent 1.2	Sub Supplier 1.2	U.S.	Any town, State	\$297.72	\$0.00	1.7%	0.0%			
Security Camera Material Subtotal				\$17,435.52	\$0.00	100.0%	0.0%			
Security Camera Total Cost	(including Profit & Manufacturing)		\$19,179.07					\$19,179.07	0.92%	0.00%
Speakers	Component Supplier	U.S.	Any town, State							
Subcomponent 1.1	Sub Supplier 1.1	U.S.	Any town, State	\$2,264.40	\$0.00	49.2%	0.0%			
Subcomponent 1.2	Sub Supplier 1.2	U.S.	Any town, State	\$2,334.60	\$0.00	50.8%	0.0%			
Speakers Material Subtotal				\$4,599.00	\$0.00	100.0%	0.0%			
Speakers Total Cost	(including Profit & Manufacturing)		\$5,058.90					\$5,058.90	0.24%	0.00%
Communication Equipment Hardware	Component Supplier	U.S.	Any town, State							
Subcomponent 1.1	Sub Supplier 1.1	U.S.	Any town, State	\$8,466.40	\$0.00	51.4%	0.0%			
Subcomponent 1.2	Sub Supplier 1.2	U.S.	Any town, State	\$8,000.00	\$0.00	48.6%	0.0%			
Comms Hardware Material Subtotal				\$16,466.40	\$0.00	100.0%	0.0%			
Comms Hardware Total Cost	(including Profit & Manufacturing)		\$18,113.04					\$18,113.04	0.87%	0.00%
Radio	Component Supplier	U.S.	Any town, State							
Subcomponent 1.1	Sub Supplier 1.1	U.S.	Any town, State	\$2,301.84	\$0.00	50.7%	0.0%			
Subcomponent 1.2	Sub Supplier 1.2	U.S.	Any town, State	\$2,241.18	\$0.00	49.3%	0.0%			
Radio Material Subtotal				\$4,543.02	\$0.00	100.0%	0.0%			
Radio Total Cost	(including Profit & Manufacturing)		\$4,997.32					\$4,997.32	0.24%	0.00%
Wi-Fi Equipment	Component Supplier	U.S.	Any town, State							
Wi-Fi Router	Sub Supplier 1.1	U.S.	Any town, State	\$3,614.40	\$0.00	70.1%	0.0%			
Ethernet Switches	Sub Supplier 1.2	U.S.	Any town, State	\$482.40	\$0.00	9.4%	0.0%			
Power Over Ethernet (POE) Switch	Sub Supplier 1.3	U.S.	Any town, State	\$1,056.60	\$0.00	20.5%	0.0%			
Wi-Fi Equipment Material Subtotal				\$5,153.40	\$0.00	100.0%	0.0%			
Wi-Fi Equipment Total Cost	(including Profit & Manufacturing)		\$5,668.74					\$5,668.74	0.27%	0.00%

SAMPLE BUY AMERICA DOMESTIC CONTENT WORKSHEET FOR RAIL ROLLING STOCK

to calculate domestic and foreign material content for Buy America Audits

System (or Group of Components)	Supplier Name	Manufacturing Location (U.S. or Foreign)	Manufacturing Location (If U.S. - City & State; If Foreign - City & Country)	Component and Subcomponent Material Costs		Subcomponent % of Component and Component Total %		U.S. Content (If U.S. % > 60%, entire 100% component cost is counted)	Component % of Vehicle	
Component				U.S.	Foreign	U.S.	Foreign		U.S.	Foreign
Subcomponent										
* COMPONENTS DEFINED IN 49 CFR 661 APPENDIX C - TYPICAL COMPONENTS OF RAIL ROLLING STOCK *										
* Lighting *										
Interior Lights	Component Supplier	U.S.	Any town, State							
Lighting Fixture	Sub Supplier 1.1	U.S.	Any town, State	\$18,156.60	\$0.00	48.1%	0.0%			
Ballast	Sub Supplier 1.2	U.S.	Any town, State	\$10,056.60	\$0.00	26.7%	0.0%			
Subcomponent 1.3	Sub Supplier 1.3	U.S.	Any town, State	\$9,504.00	\$0.00	25.2%	0.0%			
Interior Lights Material Subtotal				\$37,717.20	\$0.00	100.0%	0.0%			
Interior Lights Total Cost	(including Profit & Manufacturing)		\$41,488.92					\$41,488.92	1.99%	0.00%
Headlights	Component Supplier	U.S.	Any town, State							
Subcomponent 1.1	Sub Supplier 1.1	U.S.	Any town, State	\$2,500.46	\$0.00	71.4%	0.0%			
Subcomponent 1.2	Sub Supplier 1.2	U.S.	Any town, State	\$1,000.00	\$0.00	28.6%	0.0%			
Headlights Material Subtotal				\$3,500.46	\$0.00	100.0%	0.0%			
Headlights Total Cost	(including Profit & Manufacturing)		\$3,850.51					\$3,850.51	0.18%	0.00%
Tail Lights	Component Supplier	U.S.	Any town, State							
Subcomponent 1.1	Sub Supplier 1.1	U.S.	Any town, State	\$3,116.60	\$0.00	75.7%	0.0%			
Subcomponent 1.2	Sub Supplier 1.2	U.S.	Any town, State	\$1,000.00	\$0.00	24.3%	0.0%			
Tail Lights Material Subtotal				\$4,116.60	\$0.00	100.0%	0.0%			
Tail Lights Total Cost	(including Profit & Manufacturing)		\$4,528.26					\$4,528.26	0.22%	0.00%
Doorway Lights	Component Supplier	U.S.	Any town, State							
Subcomponent 1.1	Sub Supplier 1.1	U.S.	Any town, State	\$2,882.60	\$0.00	74.2%	0.0%			
Subcomponent 1.2	Sub Supplier 1.2	U.S.	Any town, State	\$1,000.00	\$0.00	25.8%	0.0%			
Doorway Lights Material Subtotal				\$3,882.60	\$0.00	100.0%	0.0%			
Doorway Lights Total Cost	(including Profit & Manufacturing)		\$4,270.86					\$4,270.86	0.20%	0.00%
Turn Indicator Lights	Component Supplier	Foreign	Any city, Country							
Subcomponent 1.1	Sub Supplier 1.1	Foreign	Any city, Country	\$0.00	\$2,496.62	0.0%	58.1%			
Subcomponent 1.2	Sub Supplier 1.2	Foreign	Any city, Country	\$0.00	\$500.00	0.0%	11.6%			
Subcomponent 1.3	Sub Supplier 1.3	Foreign	Any city, Country	\$0.00	\$600.00	0.0%	14.0%			
Subcomponent 1.4	Sub Supplier 1.4	Foreign	Any city, Country	\$0.00	\$700.00	0.0%	16.3%			
Turn Indicator Lights Material Subtotal				\$0.00	\$4,296.62	0.0%	100.0%			
Turn Indicator Lights Total Cost	(including Profit & Manufacturing)		\$4,846.28					\$0.00	0.00%	0.21%
Operator Cab Lights	Component Supplier	U.S.	Any town, State							
Subcomponent 1.1	Sub Supplier 1.1	U.S.	Any town, State	\$2,484.26	\$0.00	71.3%	0.0%			
Subcomponent 1.2	Sub Supplier 1.2	U.S.	Any town, State	\$1,000.00	\$0.00	28.7%	0.0%			
Operator Cab Lights Material Subtotal				\$3,484.26	\$0.00	100.0%	0.0%			
Operator Cab Lights Total Cost	(including Profit & Manufacturing)		\$3,832.69					\$3,832.69	0.18%	0.00%

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Component				U.S.	Foreign	U.S.	Foreign		U.S.	Foreign
Subcomponent										
* COMPONENTS DEFINED IN 49 CFR 661 APPENDIX C - TYPICAL COMPONENTS OF RAIL ROLLING STOCK *										
* Seating *										
Passenger Transverse Seating (Double)	Component Supplier	U.S.	Any town, State							
Seat Frame	Sub Supplier 1.1	U.S.	Any town, State	\$2,856.60	\$0.00	71.4%	0.0%			
Thermoplastic Shell	Sub Supplier 1.2	Foreign	Any city, Country	\$0.00	\$568.44	0.0%	14.2%			
Seat Cushion Insert	Sub Supplier 1.3	Foreign	Any city, Country	\$0.00	\$578.12	0.0%	14.4%			
Transverse Seating Double Material Subtotal				\$2,856.60	\$1,146.56	71.4%	28.6%			
Transverse Seating Double Total Cost	(including Profit & Manufacturing)		\$4,403.48					\$4,403.48	0.21%	0.00%
Passenger Longitudinal Seating (Single)	Component Supplier	U.S.	Any town, State							
Seat Frame	Sub Supplier 1.1	U.S.	Any town, State	\$1,718.46	\$0.00	67.5%	0.0%			
Thermoplastic Shell	Sub Supplier 1.2	Foreign	Any city, Country	\$0.00	\$447.66	0.0%	17.6%			
Seat Cushion Insert	Sub Supplier 1.3	Foreign	Any city, Country	\$0.00	\$380.34	0.0%	14.9%			
Longitudinal Seating Single Material Subtotal				\$1,718.46	\$828.00	67.5%	32.5%			
Longitudinal Seating Single Total Cost	(including Profit & Manufacturing)		\$2,801.11					\$2,801.11	0.13%	0.00%
Passenger Longitudinal Seating (Double)	Component Supplier	U.S.	Any town, State							
Seat Frame	Sub Supplier 1.1	U.S.	Any town, State	\$2,764.26	\$0.00	70.5%	0.0%			
Thermoplastic Shell	Sub Supplier 1.2	Foreign	Any city, Country	\$0.00	\$570.24	0.0%	14.6%			
Seat Cushion Insert	Sub Supplier 1.3	Foreign	Any city, Country	\$0.00	\$584.64	0.0%	14.9%			
Longitudinal Seating Double Material Subtotal				\$2,764.26	\$1,154.88	70.5%	29.5%			
Longitudinal Seating Double Total Cost	(including Profit & Manufacturing)		\$4,311.05					\$4,311.05	0.21%	0.00%
Operator Seat	Component Supplier	Foreign	Any city, Country							
Seat Frame	Sub Supplier 1.1	Foreign	Any city, Country	\$0.00	\$2,676.60	0.0%	67.5%			
Cushion	Sub Supplier 1.2	Foreign	Any city, Country	\$0.00	\$825.66	0.0%	20.8%			
Pedestal	Sub Supplier 1.3	Foreign	Any city, Country	\$0.00	\$462.24	0.0%	11.7%			
Operator Seat Material Subtotal				\$0.00	\$3,964.50	0.0%	100.0%			
Operator Seat Total Cost	(including Profit & Manufacturing)		\$4,360.95					\$0.00	0.00%	0.19%
ADA Passenger Seats	Component Supplier	U.S.	Any town, State							
Seat Frame	Sub Supplier 1.1	U.S.	Any town, State	\$1,809.00	\$0.00	68.7%	0.0%			
Thermoplastic Shell	Sub Supplier 1.2	Foreign	Any city, Country	\$0.00	\$442.26	0.0%	16.8%			
Seat Cushion Insert	Sub Supplier 1.3	Foreign	Any city, Country	\$0.00	\$383.04	0.0%	14.5%			
ADA Passenger Seats Material Subtotal				\$1,809.00	\$825.30	68.7%	31.3%			
ADA Passenger Seats Total Cost	(including Profit & Manufacturing)		\$2,897.73					\$2,897.73	0.14%	0.00%

SAMPLE BUY AMERICA DOMESTIC CONTENT WORKSHEET FOR RAIL ROLLING STOCK

to calculate domestic and foreign material content for Buy America Audits

System (or Group of Components)	Supplier Name	Manufacturing Location (U.S. or Foreign)	Manufacturing Location (If U.S. - City & State; if Foreign - City & Country)	Component and Subcomponent Material Costs		Subcomponent % of Component and Component Total %		U.S. Content (If U.S. % > 60%, entire 100% component cost is counted)	Component % of Vehicle	
Component				U.S.	Foreign	U.S.	Foreign		U.S.	Foreign
Subcomponent										

* COMPONENTS DEFINED IN 49 CFR 661 APPENDIX C - TYPICAL COMPONENTS OF RAIL ROLLING STOCK *

* Doors *

Passenger Side Door	Component Supplier	U.S.	Any town, State							
Door Frame	Sub Supplier 1.1	U.S.	Any town, State	\$9,950.40	\$0.00	39.0%	0.0%			
Door Skin	Sub Supplier 1.2	U.S.	Any town, State	\$5,846.40	\$0.00	22.9%	0.0%			
Sensitive Edge	Sub Supplier 1.3	U.S.	Any town, State	\$6,080.40	\$0.00	23.8%	0.0%			
Door Glass	Sub Supplier 1.4	U.S.	Any town, State	\$1,237.14	\$0.00	4.9%	0.0%			
Door Trim	Sub Supplier 1.5	U.S.	Any town, State	\$964.44	\$0.00	3.8%	0.0%			
Door Hanger Kit	Sub Supplier 1.6	U.S.	Any town, State	\$1,416.96	\$0.00	5.6%	0.0%			
Passenger Side Door Material Subtotal				\$25,495.74	\$0.00	100.0%	0.0%			
Passenger Side Door Total Cost	(including Profit & Manufacturing)		\$28,045.31					\$28,045.31	1.34%	0.00%
Operator Cab Door	Component Supplier	U.S.	Any town, State							
Door Frame	Sub Supplier 1.1	U.S.	Any town, State	\$7,966.44	\$0.00	74.3%	0.0%			
Door Glass	Sub Supplier 1.2	U.S.	Any town, State	\$1,057.50	\$0.00	9.9%	0.0%			
Hardware	Sub Supplier 1.3	U.S.	Any town, State	\$449.64	\$0.00	4.2%	0.0%			
Door Handle and Lockset	Sub Supplier 1.4	U.S.	Any town, State	\$1,246.32	\$0.00	11.6%	0.0%			
Operator Cab Door Material Subtotal				\$10,719.90	\$0.00	100.0%	0.0%			
Operator Cab Door Total Cost	(including Profit & Manufacturing)		\$11,791.89					\$11,791.89	0.56%	0.00%

* Door Actuators and Controls *

Door Actuators	Component Supplier	U.S.	Any town, State							
Subcomponent 1.1	Sub Supplier 1.1	U.S.	Any town, State	\$14,040.14	\$0.00	77.8%	0.0%			
Subcomponent 1.2	Sub Supplier 1.2	U.S.	Any town, State	\$4,000.00	\$0.00	22.2%	0.0%			
Door Actuators Material Subtotal				\$18,040.14	\$0.00	100.0%	0.0%			
Door Actuators Total Cost	(including Profit & Manufacturing)		\$19,844.15					\$19,844.15	0.95%	0.00%
Door Control Unit	Component Supplier	Foreign	Any city, Country							
Subcomponent 1.1	Sub Supplier 1.1	Foreign	Any city, Country	\$0.00	\$17,086.40	0.0%	63.1%			
Subcomponent 1.2	Sub Supplier 1.1	Foreign	Any city, Country	\$0.00	\$10,000.00	0.0%	36.9%			
Door Control Unit Material Subtotal				\$0.00	\$27,086.40	0.0%	100.0%			
Door Control Unit Total Cost	(including Profit & Manufacturing)		\$29,795.04					\$0.00	0.00%	1.30%
Misc. Door Actuators & Controls	Component Supplier	U.S.	Any town, State							
Subcomponent 1.1	Sub Supplier 1.1	U.S.	Any town, State	\$399.96	\$0.00	4.2%	0.0%			
Subcomponent 1.2	Sub Supplier 1.2	U.S.	Any town, State	\$1,177.20	\$0.00	12.4%	0.0%			
Subcomponent 1.3	Sub Supplier 1.3	U.S.	Any town, State	\$4,498.20	\$0.00	47.2%	0.0%			
Subcomponent 1.4	Sub Supplier 1.4	U.S.	Any town, State	\$2,631.60	\$0.00	27.6%	0.0%			
Subcomponent 1.5	Sub Supplier 1.5	U.S.	Any town, State	\$822.96	\$0.00	8.6%	0.0%			
Misc. Door Actuators & Controls Material Subtotal				\$9,529.92	\$0.00	100.0%	0.0%			
Misc. Door Actuators & Controls Total Cost	(including Profit & Manufacturing)		\$10,482.91					\$10,482.91	0.50%	0.00%

SAMPLE BUY AMERICA DOMESTIC CONTENT WORKSHEET FOR RAIL ROLLING STOCK

to calculate domestic and foreign material content for Buy America Audits

System (or Group of Components)	Supplier Name	Manufacturing Location (U.S. or Foreign)	Manufacturing Location (If U.S. - City & State; If Foreign - City & Country)	Component and Subcomponent Material Costs		Subcomponent % of Component and Component Total %		U.S. Content (If U.S. % > 60%, entire 100% component cost is counted)	Component % of Vehicle	
Component Subcomponent				U.S.	Foreign	U.S.	Foreign		U.S.	Foreign
* COMPONENTS DEFINED IN 49 CFR 661 APPENDIX C - TYPICAL COMPONENTS OF RAIL ROLLING STOCK *										
* Wheelchair Lifts and Ramps to Make the Vehicle Accessible to Persons with Disabilities *										
				\$0.00	\$0.00	#DIV/0!	#DIV/0!			
				\$0.00	\$0.00	#DIV/0!	#DIV/0!			
				\$0.00	\$0.00	#DIV/0!	#DIV/0!			
Material Subtotal				\$0.00	\$0.00	#DIV/0!	#DIV/0!			
Total Cost (including Profit & Manufacturing)			\$0.00					\$0.00	0.00%	0.00%
				\$0.00	\$0.00	#DIV/0!	#DIV/0!			
				\$0.00	\$0.00	#DIV/0!	#DIV/0!			
Material Subtotal				\$0.00	\$0.00	#DIV/0!	#DIV/0!			
Total Cost (including Profit & Manufacturing)			\$0.00					\$0.00	0.00%	0.00%
* Couplers and Draft Gear *										
Couplers	Component Supplier	Foreign	Any city, Country							
Subcomponent 1.1	Sub Supplier 1.1	U.S.	Any town, State	\$8,960.40	\$0.00	28.9%	0.0%			
Subcomponent 1.2	Sub Supplier 1.2	Foreign	Any city, Country	\$0.00	\$16,592.40	0.0%	53.6%			
Subcomponent 1.3	Sub Supplier 1.3	U.S.	Any town, State	\$5,415.84	\$0.00	17.5%	0.0%			
Couplers Material Subtotal				\$14,376.24	\$16,592.40	46.4%	53.6%			
Couplers Total Cost (including Profit & Manufacturing)			\$34,065.50					\$0.00	0.00%	0.79%
Mechanical Drawbar	Component Supplier	U.S.	Any town, State							
Subcomponent 1.1	Sub Supplier 1.1	U.S.	Any town, State	\$2,478.40	\$0.00	55.3%	0.0%			
Subcomponent 1.2	Sub Supplier 1.2	U.S.	Any town, State	\$2,000.00	\$0.00	44.7%	0.0%			
Drawbar Material Subtotal				\$4,478.40	\$0.00	100.0%	0.0%			
Drawbar Total Cost (including Profit & Manufacturing)			\$4,926.24					\$4,926.24	0.24%	0.00%
Draft Gear	Component Supplier	U.S.	Any town, State							
Subcomponent 1.1	Sub Supplier 1.1	U.S.	Any town, State	\$4,917.20	\$0.00	55.1%	0.0%			
Subcomponent 1.2	Sub Supplier 1.2	U.S.	Any town, State	\$4,000.00	\$0.00	44.9%	0.0%			
Draft Gear Material Subtotal				\$8,917.20	\$0.00	100.0%	0.0%			
Draft Gear Total Cost (including Profit & Manufacturing)			\$9,808.92					\$9,808.92	0.47%	0.00%
Lines/Receptacles	Component Supplier	U.S.	Any town, State							
Subcomponent 1.1	Sub Supplier 1.1	U.S.	Any town, State	\$1,257.20	\$0.00	55.7%	0.0%			
Subcomponent 1.2	Sub Supplier 1.2	U.S.	Any town, State	\$1,000.00	\$0.00	44.3%	0.0%			
Lines/Receptacles Material Subtotal				\$2,257.20	\$0.00	100.0%	0.0%			
Lines/Receptacles Total Cost (including Profit & Manufacturing)			\$2,482.92					\$2,482.92	0.12%	0.00%

SAMPLE BUY AMERICA DOMESTIC CONTENT WORKSHEET FOR RAIL ROLLING STOCK

to calculate domestic and foreign material content for Buy America Audits

System (or Group of Components)	Supplier Name	Manufacturing Location (U.S. or Foreign)	Manufacturing Location (If U.S. - City & State; If Foreign - City & Country)	Component and Subcomponent Material Costs		Subcomponent % of Component and Component Total %		U.S. Content (If U.S. % > 60%, entire 100% component cost is counted)	Component % of Vehicle	
Component				U.S.	Foreign	U.S.	Foreign		U.S.	Foreign
Subcomponent										
* COMPONENTS DEFINED IN 49 CFR 661 APPENDIX C - TYPICAL COMPONENTS OF RAIL ROLLING STOCK *										
* Trucks *										
Truck Frame	Component Supplier	Foreign	Any city, Country							
Frame	Sub Supplier 1.1	Foreign	Any city, Country	\$0.00	\$45,336.60	0.0%	54.2%			
Bolster	Sub Supplier 1.2	Foreign	Any city, Country	\$0.00	\$38,316.60	0.0%	45.8%			
Truck Frame Material Subtotal				\$0.00	\$83,653.20	0.0%	100.0%			
Truck Frame Total Cost	(including Profit & Manufacturing)		\$92,018.52					\$0.00	0.00%	4.00%
Wheels	Component Supplier	U.S.	Any town, State							
Subcomponent 1.1	Sub Supplier 1.1	U.S.	Any town, State	\$12,644.00	\$0.00	55.8%	0.0%			
Subcomponent 1.2	Sub Supplier 1.2	U.S.	Any town, State	\$10,000.00	\$0.00	44.2%	0.0%			
Wheels Material Subtotal				\$22,644.00	\$0.00	100.0%	0.0%			
Wheels Total Cost	(including Profit & Manufacturing)		\$24,908.40					\$24,908.40	1.19%	0.00%
* Axles *	Component Supplier	U.S.	Any town, State							
Subcomponent 1.1	Sub Supplier 1.1	U.S.	Any town, State	\$10,415.20	\$0.00	67.6%	0.0%			
Subcomponent 1.2	Sub Supplier 1.2	U.S.	Any town, State	\$5,000.00	\$0.00	32.4%	0.0%			
Axles Material Subtotal				\$15,415.20	\$0.00	100.0%	0.0%			
Axles Total Cost	(including Profit & Manufacturing)		\$16,956.72					\$16,956.72	0.81%	0.00%
* Journal Bearings *	Component Supplier	U.S.	Any town, State							
Subcomponent 1.1	Sub Supplier 1.1	U.S.	Any town, State	\$10,732.00	\$0.00	68.2%	0.0%			
Subcomponent 1.2	Sub Supplier 1.2	U.S.	Any town, State	\$5,000.00	\$0.00	31.8%	0.0%			
Journal Bearings Material Subtotal				\$15,732.00	\$0.00	100.0%	0.0%			
Journal Bearings Total Cost	(including Profit & Manufacturing)		\$17,305.20					\$17,305.20	0.83%	0.00%
Primary Suspension	Component Supplier	U.S.	Any town, State							
Subcomponent 1.1	Sub Supplier 1.1	U.S.	Any town, State	\$5,799.20	\$0.00	59.2%	0.0%			
Subcomponent 1.2	Sub Supplier 1.2	U.S.	Any town, State	\$4,000.00	\$0.00	40.8%	0.0%			
Primary Suspension Material Subtotal				\$9,799.20	\$0.00	100.0%	0.0%			
Primary Suspension Total Cost	(including Profit & Manufacturing)		\$10,779.12					\$10,779.12	0.52%	0.00%
Secondary Suspension	Component Supplier	U.S.	Any town, State							
Subcomponent 1.1	Sub Supplier 1.1	U.S.	Any town, State	\$4,782.20	\$0.00	54.5%	0.0%			
Subcomponent 1.2	Sub Supplier 1.2	U.S.	Any town, State	\$4,000.00	\$0.00	45.5%	0.0%			
Secondary Suspension Material Subtotal				\$8,782.20	\$0.00	100.0%	0.0%			
Secondary Suspension Total Cost	(including Profit & Manufacturing)		\$9,660.42					\$9,660.42	0.46%	0.00%
Shock Absorbers	Component Supplier	U.S.	Any town, State							
Subcomponent 1.1	Sub Supplier 1.1	U.S.	Any town, State	\$3,012.82	\$0.00	60.1%	0.0%			
Subcomponent 1.2	Sub Supplier 1.2	U.S.	Any town, State	\$2,000.00	\$0.00	39.9%	0.0%			
Shock Absorbers Material Subtotal				\$5,012.82	\$0.00	100.0%	0.0%			
Shock Absorbers Total Cost	(including Profit & Manufacturing)		\$5,514.10					\$5,514.10	0.26%	0.00%
Misc. Truck Liners, Harnesses, Brackets, etc.	Component Supplier	U.S.	Any town, State							
Subcomponent 1.1	Sub Supplier 1.1	U.S.	Any town, State	\$34,582.20	\$0.00	53.5%	0.0%			
Subcomponent 1.2	Sub Supplier 1.2	U.S.	Any town, State	\$30,000.00	\$0.00	46.5%	0.0%			
Misc. Material Subtotal				\$64,582.20	\$0.00	100.0%	0.0%			
Misc. Total Cost	(including Profit & Manufacturing)		\$71,040.42					\$71,040.42	3.40%	0.00%

SAMPLE BUY AMERICA DOMESTIC CONTENT WORKSHEET FOR RAIL ROLLING STOCK

to calculate domestic and foreign material content for Buy America Audits

System (or Group of Components)	Supplier Name	Manufacturing Location (U.S. or Foreign)	Manufacturing Location (If U.S. - City & State; if Foreign - City & Country)	Component and Subcomponent Material Costs		Subcomponent % of Component and Component Total %		U.S. Content (If U.S. % > 60%, entire 100% component cost is counted)	Component % of Vehicle	
Component				U.S.	Foreign	U.S.	Foreign		U.S.	Foreign
Subcomponent										

* COMPONENTS DEFINED IN 49 CFR 661 APPENDIX C - TYPICAL COMPONENTS OF RAIL ROLLING STOCK *

* Diagnostic Equipment *										
Monitoring & Diagnostic System (MDS)	Component Supplier	U.S.	Any town, State							
Subcomponent 1.1	Sub Supplier 1.1	U.S.	Any town, State	\$39,341.40	\$0.00	56.7%	0.0%			
Subcomponent 1.2	Sub Supplier 1.2	U.S.	Any town, State	\$30,000.00	\$0.00	43.3%	0.0%			
MDS Material Subtotal				\$69,341.40	\$0.00	100.0%	0.0%			
MDS Total Cost	(including Profit & Manufacturing)		\$76,275.54					\$76,275.54	3.65%	0.00%
Event Recorder & Alertness Control	Component Supplier	Foreign	Any city, Country							
Subcomponent 1.1	Sub Supplier 1.1	Foreign	Any city, Country	\$0.00	\$8,222.40	0.0%	76.3%			
Subcomponent 1.2	Sub Supplier 1.2	Foreign	Any city, Country	\$0.00	\$1,478.52	0.0%	13.7%			
Subcomponent 1.3	Sub Supplier 1.3	Foreign	Any city, Country	\$0.00	\$1,070.64	0.0%	9.9%			
Event Recorder Material Subtotal				\$0.00	\$10,771.56	0.0%	100.0%			
Event Recorder Total Cost	(including Profit & Manufacturing)		\$11,848.72					\$0.00	0.00%	0.52%

* Third Rail Pick-up Equipment *										
				\$0.00	\$0.00	#DIV/0!	#DIV/0!			
				\$0.00	\$0.00	#DIV/0!	#DIV/0!			
Third Rail Pick-up Material Subtotal				\$0.00	\$0.00	#DIV/0!	#DIV/0!			
Third Rail Pick-up Total Cost	(including Profit & Manufacturing)		\$0.00					\$0.00	0.00%	0.00%

Electronic Sign Assemblies										
Front Sign	Component Supplier	U.S.	Any town, State							
Subcomponent 1.1	Sub Supplier 1.1	U.S.	Any town, State	\$6,557.02	\$0.00	76.0%	0.0%			
Subcomponent 1.2	Sub Supplier 1.2	Foreign	Any city, Country	\$0.00	\$2,074.21	0.0%	24.0%			
Front Sign Material Subtotal				\$6,557.02	\$2,074.21	76.0%	24.0%			
Front Sign Total Cost	(including Profit & Manufacturing)		\$9,412.72					\$9,412.72	0.45%	0.00%
Side Signs	Component Supplier	U.S.	Any town, State							
Subcomponent 1.1	Sub Supplier 1.1	U.S.	Any town, State	\$11,298.40	\$0.00	84.0%	0.0%			
Subcomponent 1.2	Sub Supplier 1.2	Foreign	Any city, Country	\$0.00	\$2,158.36	0.0%	16.0%			
Side Signs Material Subtotal				\$11,298.40	\$2,158.36	84.0%	16.0%			
Side Signs Total Cost	(including Profit & Manufacturing)		\$14,628.24					\$14,628.24	0.70%	0.00%
Train Number Sign	Component Supplier	U.S.	Any town, State							
Subcomponent 1.1	Sub Supplier 1.1	U.S.	Any town, State	\$5,997.00	\$0.00	74.9%	0.0%			
Subcomponent 1.2	Sub Supplier 1.2	Foreign	Any city, Country	\$0.00	\$2,004.88	0.0%	25.1%			
Train Number Signs Material Subtotal				\$5,997.00	\$2,004.88	74.9%	25.1%			
Train Number Signs Total Cost	(including Profit & Manufacturing)		\$8,444.70					\$8,444.70	0.40%	0.00%
Interior Variable Message Sign	Component Supplier	U.S.	Any town, State							
Subcomponent 1.1	Sub Supplier 1.1	U.S.	Any town, State	\$19,389.40	\$0.00	91.2%	0.0%			
Subcomponent 1.2	Sub Supplier 1.2	Foreign	Any city, Country	\$0.00	\$1,875.98	0.0%	8.8%			
Variable Message Signs Material Subtotal				\$19,389.40	\$1,875.98	91.2%	8.8%			
Variable Message Signs Total Cost	(including Profit & Manufacturing)		\$23,528.34					\$23,528.34	1.13%	0.00%

SAMPLE BUY AMERICA DOMESTIC CONTENT WORKSHEET FOR RAIL ROLLING STOCK

to calculate domestic and foreign material content for Buy America Audits

System (or Group of Components)	Supplier Name	Manufacturing Location (U.S. or Foreign)	Manufacturing Location (If U.S. - City & State; If Foreign - City & Country)	Component and Subcomponent Material Costs		Subcomponent % of Component and Component Total %		U.S. Content (If U.S. % > 60%, entire 100% component cost is counted)	Component % of Vehicle	
Component				U.S.	Foreign	U.S.	Foreign		U.S.	Foreign
Subcomponent										

* COMPONENTS DEFINED IN 49 CFR 661 APPENDIX C - TYPICAL COMPONENTS OF RAIL ROLLING STOCK *

On-Board Energy Storage System

Roof-Mounted Super-Capacitor Modules	Component Supplier	U.S.	Any town, State							
Subcomponent 1.1	Sub Supplier 1.1	U.S.	Any town, State	\$35,843.15	\$0.00	78.2%	0.0%			
Subcomponent 1.2	Sub Supplier 1.2	U.S.	Any town, State	\$10,000.00	\$0.00	21.8%	0.0%			
Material Subtotal				\$45,843.15	\$0.00	100.0%	0.0%			
Total Cost	(including Profit & Manufacturing)		\$50,128.57					\$50,128.57	2.40%	0.00%

Flooring

Floor Covering	Component Supplier	U.S.	Any town, State							
Subcomponent 1.1	Sub Supplier 1.1	U.S.	Any town, State	\$7,848.44	\$0.00	88.7%	0.0%			
Subcomponent 1.2	Sub Supplier 1.2	U.S.	Any town, State	\$1,000.00	\$0.00	11.3%	0.0%			
Floor Covering Material Subtotal				\$8,848.44	\$0.00	100.0%	0.0%			
Floor Covering Total Cost	(including Profit & Manufacturing)		\$9,733.28					\$9,733.28	0.47%	0.00%
Floor Panels	Component Supplier	U.S.	Any town, State							
Subcomponent 1.1	Sub Supplier 1.1	U.S.	Any town, State	\$9,149.76	\$0.00	100.0%	0.0%			
Subcomponent 1.2	Sub Supplier 1.2	U.S.	Any town, State	\$0.00	\$0.00	0.0%	0.0%			
Floor Panels Material Subtotal				\$9,149.76	\$0.00	100.0%	0.0%			
Floor Panels Total Cost	(including Profit & Manufacturing)		\$10,064.74					\$10,064.74	0.48%	0.00%

Other Miscellaneous Components

Wire/Cable	Component Supplier	U.S.	Any town, State							
Subcomponent 1.1	Sub Supplier 1.1	U.S.	Any town, State	\$58,644.00	\$0.00	100.0%	0.0%			
Subcomponent 1.2	Sub Supplier 1.2	U.S.	Any town, State	\$0.00	\$0.00	0.0%	0.0%			
Wire/Cable Material Subtotal				\$58,644.00	\$0.00	100.0%	0.0%			
Wire/Cable Total Cost	(including Profit & Manufacturing)		\$64,508.40					\$64,508.40	3.09%	0.00%
Harnesses	Component Supplier	U.S.	Any town, State							
Subcomponent 1.1	Sub Supplier 1.1	U.S.	Any town, State	\$56,316.60	\$0.00	100.0%	0.0%			
Subcomponent 1.2	Sub Supplier 1.2	U.S.	Any town, State	\$0.00	\$0.00	0.0%	0.0%			
Harnesses Material Subtotal				\$56,316.60	\$0.00	100.0%	0.0%			
Harnesses Total Cost	(including Profit & Manufacturing)		\$61,948.26					\$61,948.26	2.97%	0.00%
Locks & Interior Hardware	Component Supplier	U.S.	Any town, State							
Subcomponent 1.1	Sub Supplier 1.1	U.S.	Any town, State	\$22,496.40	\$0.00	100.0%	0.0%			
Subcomponent 1.2	Sub Supplier 1.2	U.S.	Any town, State	\$0.00	\$0.00	0.0%	0.0%			
Locks & Interior Hardware Material Subtotal				\$22,496.40	\$0.00	100.0%	0.0%			
Locks & Interior Hardware Total Cost	(including Profit & Manufacturing)		\$24,746.04					\$24,746.04	1.18%	0.00%
Cab Partition Curtain	Component Supplier	U.S.	Any town, State							
Subcomponent 1.1	Sub Supplier 1.1	U.S.	Any town, State	\$1,714.32	\$0.00	100.0%	0.0%			
Subcomponent 1.2	Sub Supplier 1.2	U.S.	Any town, State	\$0.00	\$0.00	0.0%	0.0%			
Cab Partition Curtain Material Subtotal				\$1,714.32	\$0.00	100.0%	0.0%			
Cab Partition Curtain Total Cost	(including Profit & Manufacturing)		\$1,885.75					\$1,885.75	0.09%	0.00%

SAMPLE BUY AMERICA DOMESTIC CONTENT WORKSHEET FOR RAIL ROLLING STOCK

to calculate domestic and foreign material content for Buy America Audits

System (or Group of Components)	Supplier Name	Manufacturing Location (U.S. or Foreign)	Manufacturing Location (If U.S. - City & State; If Foreign - City & Country)	Component and Subcomponent Material Costs		Subcomponent % of Component and Component Total %		U.S. Content (If U.S. % >60%, entire 100% component cost is counted)	Component % of Vehicle	
Component				U.S.	Foreign	U.S.	Foreign		U.S.	Foreign
Subcomponent										
* COMPONENTS DEFINED IN 49 CFR 661 APPENDIX C - TYPICAL COMPONENTS OF RAIL ROLLING STOCK *										
Other Miscellaneous Components										
Sun Visor	Component Supplier	U.S.	Any town, State							
Subcomponent 1.1	Sub Supplier 1.1	U.S.	Any town, State	\$2,064.60	\$0.00	100.0%	0.0%			
Subcomponent 1.2	Sub Supplier 1.2	U.S.	Any town, State	\$0.00	\$0.00	0.0%	0.0%			
Sun Visor Material Subtotal				\$2,064.60	\$0.00	100.0%	0.0%			
Sun Visor Total Cost	(including Profit & Manufacturing)		\$2,271.06					\$2,271.06	0.11%	0.00%
Windshield Wipers	Component Supplier	U.S.	Any town, State							
Wiper Motor	Sub Supplier 1.1	U.S.	Any town, State	\$647.12	\$0.00	38.1%	0.0%			
Harness	Sub Supplier 1.2	U.S.	Any town, State	\$1,052.12	\$0.00	61.9%	0.0%			
Windshield Wipers Material Subtotal				\$1,699.25	\$0.00	100.0%	0.0%			
Windshield Wipers Total Cost	(including Profit & Manufacturing)		\$1,869.17					\$1,869.17	0.08%	0.00%
Windshield Washers	Component Supplier	U.S.	Any town, State							
Windshield Washer Reservoir	Sub Supplier 1.1	U.S.	Any town, State	\$647.12	\$0.00	38.1%	0.0%			
Tubing and Nozzles	Sub Supplier 1.2	U.S.	Any town, State	\$1,052.12	\$0.00	61.9%	0.0%			
Windshield Washers Material Subtotal				\$1,699.25	\$0.00	100.0%	0.0%			
Windshield Washers Total Cost	(including Profit & Manufacturing)		\$1,869.17					\$1,869.17	0.08%	0.00%
Stanchions & Handrails	Component Supplier	U.S.	Any town, State							
Stanchions Pole	Sub Supplier 1.1	U.S.	Any town, State	\$2,956.12	\$0.00	72.9%	0.0%			
Mounting Bracket	Sub Supplier 1.2	U.S.	Any town, State	\$1,100.00	\$0.00	27.1%	0.0%			
Stanchions & Handrails Material Subtotal				\$4,056.12	\$0.00	100.0%	0.0%			
Stanchions & Handrails Total Cost	(including Profit & Manufacturing)		\$4,461.73					\$4,461.73	0.21%	0.00%
Fire Extinguisher	Component Supplier	U.S.	Any town, State							
Subcomponent 1.1	Sub Supplier 1.1	U.S.	Any town, State	\$944.10	\$0.00	96.7%	0.0%			
Subcomponent 1.2	Sub Supplier 1.2	U.S.	Any town, State	\$32.15	\$0.00	3.3%	0.0%			
Fire Extinguisher Material Subtotal				\$976.25	\$0.00	100.0%	0.0%			
Fire Extinguisher Total Cost	(including Profit & Manufacturing)		\$1,038.51					\$1,038.51	0.05%	0.00%
Hardware	Component Supplier	Foreign	Any city, Country							
Lugs	Sub Supplier 1.1	Foreign	Any city, Country	\$0.00	\$4,325.20	0.0%	100.0%			
Hardware Material Subtotal				\$0.00	\$4,325.20	0.0%	100.0%			
Hardware Total Cost	(including Profit & Manufacturing)		\$4,757.72					\$0.00	0.00%	0.21%
Paint	Component Supplier	U.S.	Any town, State							
Subcomponent 1.1	Sub Supplier 1.1	U.S.	Any town, State	\$3,889.55	\$0.00	100.0%	0.0%			
Paint Material Subtotal				\$3,889.55	\$0.00	100.0%	0.0%			
Paint Total Cost	(including Profit & Manufacturing)		\$4,668.62					\$4,668.62	0.22%	0.00%
Decals	Component Supplier	U.S.	Any town, State							
Subcomponent 1.1	Sub Supplier 1.1	U.S.	Any town, State	\$2,779.80	\$0.00	69.8%	0.0%			
Subcomponent 1.2	Sub Supplier 1.2	U.S.	Any town, State	\$1,200.00	\$0.00	30.2%	0.0%			
Decals Material Subtotal				\$3,979.80	\$0.00	100.0%	0.0%			
Decals Total Cost	(including Profit & Manufacturing)		\$4,377.78					\$4,377.78	0.21%	0.00%

SAMPLE BUY AMERICA DOMESTIC CONTENT WORKSHEET FOR RAIL ROLLING STOCK

to calculate domestic and foreign material content for Buy America Audits

System (or Group of Components)	Supplier Name	Manufacturing Location (U.S. or Foreign)	Manufacturing Location (If U.S. - City & State; If Foreign - City & Country)	Component and Subcomponent Material Costs		Subcomponent % of Component and Component Total %		U.S. Content (If U.S. % > 60%, entire 100% component cost is counted)	Component % of Vehicle	
Component				U.S.	Foreign	U.S.	Foreign		U.S.	Foreign
Subcomponent										
* COMPONENTS DEFINED IN 49 CFR 661 APPENDIX C - TYPICAL COMPONENTS OF RAIL ROLLING STOCK *										
Other Miscellaneous Components										
Exterior Roof Skirts	Component Supplier	U.S.	Any town, State							
Subcomponent 1.1	Sub Supplier 1.1	U.S.	Any town, State	\$3,156.60	\$0.00	67.8%	0.0%			
Subcomponent 1.2	Sub Supplier 1.2	U.S.	Any town, State	\$1,500.00	\$0.00	32.2%	0.0%			
Exterior Roof Skirts Material Subtotal				\$4,656.60	\$0.00	100.0%	0.0%			
Exterior Roof Skirt Total Cost	(including Profit & Manufacturing)		\$5,122.26					\$5,122.26	0.25%	0.00%
Underfloor Skirts	Component Supplier	U.S.	Any town, State							
Subcomponent 1.1	Sub Supplier 1.1	U.S.	Any town, State	\$3,371.65	\$0.00	87.1%	0.0%			
Subcomponent 1.2	Sub Supplier 1.2	U.S.	Any town, State	\$500.00	\$0.00	12.9%	0.0%			
Underfloor Skirts Material Subtotal				\$3,871.65	\$0.00	100.0%	0.0%			
Underfloor Skirts Total Cost	(including Profit & Manufacturing)		\$4,258.81					\$4,258.81	0.20%	0.00%
Operator Cab Console	Component Supplier	U.S.	Any town, State							
Subcomponent 1.1	Sub Supplier 1.1	U.S.	Any town, State	\$3,627.80	\$0.00	78.4%	0.0%			
Subcomponent 1.2	Sub Supplier 1.2	U.S.	Any town, State	\$1,000.00	\$0.00	21.6%	0.0%			
Operator Cab Console Material Subtotal				\$4,627.80	\$0.00	100.0%	0.0%			
Operator Cab Console Total Cost	(including Profit & Manufacturing)		\$4,730.58					\$4,730.58	0.23%	0.00%
Indicator Panels	Component Supplier	Foreign	Any city, Country							
Subcomponent 1.1	Sub Supplier 1.1	Foreign	Any city, Country	\$0.00	\$1,008.02	0.0%	59.0%			
Subcomponent 1.2	Sub Supplier 1.2	Foreign	Any city, Country	\$0.00	\$700.00	0.0%	41.0%			
Indicator Panels Material Subtotal				\$0.00	\$1,708.02	0.0%	100.0%			
Indicator Panels Total Cost	(including Profit & Manufacturing)		\$1,878.82					\$0.00	0.00%	0.08%
Totals										
Vehicle Material Subtotal				\$1,354,854.70	\$734,404.83				64.85%	35.15%
Vehicle Material Total Cost				\$2,089,259.54						
Vehicle Total Cost (including Profit & Manufacturing)				\$2,299,511.21						

A.2 Bus Domestic Content Calculations Worksheet

For instruction on completing the worksheet below, please see [Section 4.3.3 Domestic Content Worksheet Instructions](#). The following worksheet is for sample purposes only. Actual domestic content calculations may require other components and subcomponents. See 49 CFR § 661.11 Rolling stock procurements and this handbook for further information.

SAMPLE BUY AMERICA DOMESTIC CONTENT WORKSHEET FOR BUS

to calculate domestic and foreign material content for Buy America Audits

System (or Group of Components)	Supplier Name	Manufacturing Location (U.S. or Foreign)	Manufacturing Location (If U.S. - City & State; If Foreign - City & Country)	Component and Subcomponent Material Costs		Subcomponent % of Component and Component Total %		U.S. Content (If U.S. % > 60%, entire 100% component cost is counted)	Component % of Vehicle	
Component Subcomponent				U.S.	Foreign	U.S.	Foreign		U.S.	Foreign
* COMPONENTS DEFINED IN 49 CFR 661 APPENDIX B - TYPICAL COMPONENTS OF BUSES *										
Car Body Shells										
* Car Body Shells *	Component Supplier	U.S.	Any city, Country							
Body Sections	Sub Supplier 1.1	U.S.	Any town, State	\$11,917.19	\$0.00	38.5%	0.0%			
Roof	Sub Supplier 1.2	Foreign	Any city, Country	\$0.00	\$6,611.76	0.0%	21.4%			
Chassis	Sub Supplier 1.3	Foreign	Any city, Country	\$0.00	\$4,876.81	0.0%	15.8%			
Wheel Wells	Sub Supplier 1.1	Foreign	Any city, Country	\$0.00	\$2,559.60	0.0%	8.3%			
Misc. Body Pieces	Sub Supplier 1.4	Foreign	Any city, Country	\$0.00	\$4,956.26	0.0%	16.0%			
Car Body Shells Material Subtotal				\$11,917.19	\$19,004.42	38.5%	61.5%			
Car Body Shells Total Cost	(Including Profit & Manufacturing)		\$34,013.78					\$11,917.19	1.72%	2.74%
Engines										
* Engines *	Component Supplier	U.S.	Any town, State							
Engine Block	Sub Supplier 1.1	U.S.	Any town, State	\$39,865.50	\$0.00	87.7%	0.0%			
Engine Hardware	Sub Supplier 1.2	Foreign	Any city, Country	\$0.00	\$3,871.13	0.0%	8.5%			
Engine Harness	Sub Supplier 1.3	Foreign	Any city, Country	\$0.00	\$1,718.55	0.0%	3.8%			
Engines Material Subtotal				\$39,865.50	\$5,589.68	87.7%	12.3%			
Engines Total Cost	(Including Profit & Manufacturing)		\$50,000.69					\$50,000.69	7.20%	0.00%
Exhaust	Component Supplier	U.S.	Any town, State							
Muffler	Sub Supplier 1.1	U.S.	Any town, State	\$4,676.40	\$0.00	78.9%	0.0%			
Mounting Brackets	Sub Supplier 1.2	U.S.	Any town, State	\$1,254.13	\$0.00	21.1%	0.0%			
Exhaust Material Subtotal				\$5,930.53	\$0.00	100.0%	0.0%			
Exhaust Total Cost	(Including Profit & Manufacturing)		\$6,344.04					\$6,344.04	0.91%	0.00%
Radiator	Component Supplier	U.S.	Any town, State							
Coils	Sub Supplier 1.1	U.S.	Any town, State	\$6,667.90	\$0.00	66.1%	0.0%			
Charge Air Cooler	Sub Supplier 1.2	U.S.	Any town, State	\$1,582.03	\$0.00	15.7%	0.0%			
Cap	Sub Supplier 1.3	U.S.	Any town, State	\$1,842.41	\$0.00	18.3%	0.0%			
Radiator Material Subtotal				\$10,092.34	\$0.00	100.0%	0.0%			
Radiator Total Cost	(Including Profit & Manufacturing)		\$11,734.69					\$11,734.69	1.69%	0.00%

SAMPLE BUY AMERICA DOMESTIC CONTENT WORKSHEET FOR BUS

to calculate domestic and foreign material content for Buy America Audits

System (or Group of Components)	Supplier Name	Manufacturing Location (U.S. or Foreign)	Manufacturing Location (If U.S. - City & State; if Foreign - City & Country)	Component and Subcomponent Material Costs		Subcomponent % of Component and Component Total %		U.S. Content (If U.S. % > 60%, entire 100% component cost is counted)	Component % of Vehicle	
Component				U.S.	Foreign	U.S.	Foreign		U.S.	Foreign
Subcomponent										

* COMPONENTS DEFINED IN 49 CFR 661 APPENDIX B - TYPICAL COMPONENTS OF BUSES *

Transmissions										
* Transmissions *	Component Supplier	U.S.	Any town, State							
Case	Sub Supplier 1.1	U.S.	Any town, State	\$17,865.86	\$0.00	85.3%	0.0%			
Output Shaft	Sub Supplier 1.2	U.S.	Any town, State	\$1,046.52	\$0.00	5.0%	0.0%			
Planetary Gear Set	Sub Supplier 1.3	U.S.	Any town, State	\$2,042.66	\$0.00	9.7%	0.0%			
Transmissions Material Subtotal				\$20,955.04	\$0.00	100.0%	0.0%			
Transmissions Total Cost	(including Profit & Manufacturing)		\$23,003.62					\$23,003.62	3.31%	0.00%

Front and Rear Axle, Suspension, Steering, and Wheels										
* Front Axle Assemblies *	Component Supplier	U.S.	Any town, State							
Subcomponent 1.1	Sub Supplier 1.1	U.S.	Any town, State	\$3,850.35	\$0.00	79.3%	0.0%			
Subcomponent 1.2	Sub Supplier 1.2	U.S.	Any town, State	\$1,004.21	\$0.00	20.7%	0.0%			
Front Axle Material Subtotal				\$4,854.56	\$0.00	100.0%	0.0%			
Front Axle Total Cost	(including Profit & Manufacturing)		\$5,335.38					\$5,335.38	0.77%	0.00%
* Rear Axle Assemblies *	Component Supplier	U.S.	Any town, State							
Subcomponent 1.1	Sub Supplier 1.1	U.S.	Any town, State	\$3,118.45	\$0.00	73.0%	0.0%			
Subcomponent 1.2	Sub Supplier 1.2	U.S.	Any town, State	\$1,153.90	\$0.00	27.0%	0.0%			
Rear Axle Material Subtotal				\$4,272.35	\$0.00	100.0%	0.0%			
Rear Axle Total Cost	(including Profit & Manufacturing)		\$4,530.29					\$4,530.29	0.65%	0.00%
Center Axle Assemblies	Component Supplier	U.S.	Any town, State							
Subcomponent 1.1	Sub Supplier 1.1	U.S.	Any town, State	\$3,850.35	\$0.00	79.3%	0.0%			
Subcomponent 1.2	Sub Supplier 1.2	U.S.	Any town, State	\$1,004.21	\$0.00	20.7%	0.0%			
Center Axle Material Subtotal				\$4,854.56	\$0.00	100.0%	0.0%			
Center Axle Total Cost	(including Profit & Manufacturing)		\$5,335.38					\$5,335.38	0.77%	0.00%
* Drive Shaft Assemblies *	Component Supplier	U.S.	Any town, State							
Universal Joint	Sub Supplier 1.1	U.S.	Any town, State	\$1,672.26	\$0.00	62.6%	0.0%			
Tube/Sleeve	Sub Supplier 1.2	U.S.	Any town, State	\$997.35	\$0.00	37.4%	0.0%			
Drive Shaft Material Subtotal				\$2,669.61	\$0.00	100.0%	0.0%			
Drive Shaft Total Cost	(including Profit & Manufacturing)		\$2,939.48					\$2,939.48	0.42%	0.00%
* Front Suspension Assemblies *	Component Supplier	Foreign w/ Tariff Ex	Any city, Country							
Air Springs	Sub Supplier 1.1	Foreign	Any city, Country	\$0.00	\$606.96	0.0%	40.4%			
Shock Absorbers	Sub Supplier 1.2	U.S.	Any town, State	\$896.27	\$0.00	59.6%	0.0%			
Front Suspension Material Subtotal				\$896.27	\$606.96	59.6%	40.4%			
Front Suspension Total Cost	(including Profit & Manufacturing)		\$1,653.55					\$896.27	0.13%	0.11%
* Rear Suspension Assemblies *	Component Supplier	Foreign w/ Tariff Ex	Any city, Country							
Air Springs	Sub Supplier 1.1	Foreign	Any city, Country	\$0.00	\$10,370.23	0.0%	94.0%			
Shock Absorbers	Sub Supplier 1.2	U.S.	Any town, State	\$662.85	\$0.00	6.0%	0.0%			
Rear Suspension Material Subtotal				\$662.85	\$10,370.23	6.0%	94.0%			
Rear Suspension Total Cost	(including Profit & Manufacturing)		\$12,136.39					\$662.85	0.10%	1.65%

SAMPLE BUY AMERICA DOMESTIC CONTENT WORKSHEET FOR BUS

to calculate domestic and foreign material content for Buy America Audits

System (or Group of Components)	Supplier Name	Manufacturing Location (U.S. or Foreign)	Manufacturing Location (If U.S. - City & State; if Foreign - City & Country)	Component and Subcomponent Material Costs		Subcomponent % of Component and Component Total %		U.S. Content (if U.S. % > 60%, entire 100% component cost is counted)	Component % of Vehicle	
Component				U.S.	Foreign	U.S.	Foreign		U.S.	Foreign
Subcomponent										

* COMPONENTS DEFINED IN 49 CFR 661 APPENDIX B - TYPICAL COMPONENTS OF BUSES *

Front and Rear Axle, Suspension, Steering, and Wheels										
* Steering System Assemblies *	<i>Component Supplier</i>	<i>Foreign w/ Tariff Ex</i>	<i>Any city, Country</i>							
Steering Column	Sub Supplier 1.1	Foreign	Any city, Country	\$0.00	\$366.05	0.0%	26.2%			
Power Steering Linkages	Sub Supplier 1.2	U.S.	Any town, State	\$1,031.27	\$0.00	73.8%	0.0%			
Steering System Material Subtotal				\$1,031.27	\$366.05	73.8%	26.2%			
Steering System Total Cost	<i>(including Profit & Manufacturing)</i>		\$1,537.05					\$1,031.27	0.15%	0.07%
Wheels	<i>Component Supplier</i>	<i>U.S.</i>	<i>Any town, State</i>							
Wheel Hub	Sub Supplier 1.1	U.S.	Any town, State	\$3,582.83	\$0.00	35.3%	0.0%			
Tires	Sub Supplier 1.2	U.S.	Any town, State	\$6,580.58	\$0.00	64.7%	0.0%			
Wheels Material Subtotal				\$10,163.41	\$0.00	100.0%	0.0%			
Wheels Total Cost	<i>(including Profit & Manufacturing)</i>		\$11,179.75					\$11,179.75	1.61%	0.00%

* Air Compressor and Pneumatic Systems *										
Air Compressor	<i>Component Supplier</i>	<i>Foreign</i>	<i>Any city, Country</i>							
Subcomponent 1.1	Sub Supplier 1.1	Foreign	Any city, Country	\$0.00	\$606.96	0.0%	40.4%			
Subcomponent 1.2	Sub Supplier 1.2	U.S.	Any town, State	\$896.27	\$0.00	59.6%	0.0%			
Air Compressor Material Subtotal				\$896.27	\$606.96	59.6%	40.4%			
Air Compressor Total Cost	<i>(including Profit & Manufacturing)</i>		\$1,653.55					\$0.00	0.00%	0.09%
Air Cylinders	<i>Component Supplier</i>	<i>Foreign</i>	<i>Any city, Country</i>							
Tank Body	Sub Supplier 1.1	Foreign	Any city, Country	\$0.00	\$3,620.23	0.0%	84.5%			
Drain Valve and Pressure Valve	Sub Supplier 1.2	U.S.	Any town, State	\$662.85	\$0.00	15.5%	0.0%			
Air Cylinders Material Subtotal				\$662.85	\$3,620.23	15.5%	84.5%			
Air Cylinders Total Cost	<i>(including Profit & Manufacturing)</i>		\$4,711.39					\$0.00	0.00%	0.52%
Air Motor	<i>Component Supplier</i>	<i>Foreign</i>	<i>Any city, Country</i>							
Subcomponent 1.1	Sub Supplier 1.1	Foreign	Any city, Country	\$0.00	\$1,041.05	0.0%	100.0%			
Subcomponent 1.2				\$0.00	\$0.00	0.0%	0.0%			
Air Motor Material Subtotal				\$0.00	\$1,041.05	0.0%	100.0%			
Air Motor Total Cost	<i>(including Profit & Manufacturing)</i>		\$1,145.16					\$0.00	0.00%	0.15%

SAMPLE BUY AMERICA DOMESTIC CONTENT WORKSHEET FOR BUS

to calculate domestic and foreign material content for Buy America Audits

System (or Group of Components)	Supplier Name	Manufacturing Location (U.S. or Foreign)	Manufacturing Location (If U.S. - City & State; if Foreign - City & Country)	Component and Subcomponent Material Costs		Subcomponent % of Component and Component Total %		U.S. Content (If U.S. % > 60%, entire 100% component cost is counted)	Component % of Vehicle	
Component				U.S.	Foreign	U.S.	Foreign		U.S.	Foreign
Subcomponent										

* COMPONENTS DEFINED IN 49 CFR 661 APPENDIX B - TYPICAL COMPONENTS OF BUSES *

* Generator/Alternator and Electrical Systems *										
Alternator	<i>Component Supplier</i>	U.S.	Any town, State							
Stator Winding	Sub Supplier 1.1	U.S.	Any town, State	\$52.61	\$0.00	38.9%	0.0%			
Rotor	Sub Supplier 1.2	U.S.	Any town, State	\$38.95	\$0.00	28.8%	0.0%			
Fan	Sub Supplier 1.3	U.S.	Any town, State	\$43.81	\$0.00	32.4%	0.0%			
Alternator Material Subtotal				\$135.37	\$0.00	100.0%	0.0%			
Alternator Total Cost	(including Profit & Manufacturing)		\$202.84					\$202.84	0.03%	0.00%
Auxiliary Alternator	<i>Component Supplier</i>	U.S.	Any town, State							
Rotor	Sub Supplier 1.1	U.S.	Any town, State	\$208.95	\$0.00	67.5%	0.0%			
Bearings	Sub Supplier 1.2	U.S.	Any town, State	\$100.46	\$0.00	32.5%	0.0%			
Auxiliary Alternator Material Subtotal				\$309.41	\$0.00	100.0%	0.0%			
Auxiliary Alternator Total Cost	(including Profit & Manufacturing)		\$339.84					\$339.84	0.05%	0.00%
Battery	<i>Component Supplier</i>	U.S.	Any town, State							
Subcomponent 1.1	Sub Supplier 1.1	U.S.	Any town, State	\$76.45	\$0.00	74.8%	0.0%			
Subcomponent 1.2	Sub Supplier 1.2	U.S.	Any town, State	\$25.74	\$0.00	25.2%	0.0%			
Battery Material Subtotal				\$102.19	\$0.00	100.0%	0.0%			
Battery Total Cost	(including Profit & Manufacturing)		\$117.09					\$117.09	0.02%	0.00%
Battery Enclosure	<i>Component Supplier</i>	U.S.	Any town, State							
Subcomponent 1.1	Sub Supplier 1.1	U.S.	Any town, State	\$5,070.60	\$0.00	84.4%	0.0%			
Subcomponent 1.2	Sub Supplier 1.2	U.S.	Any town, State	\$936.22	\$0.00	15.6%	0.0%			
Battery Enclosure Material Subtotal				\$6,006.82	\$0.00	100.0%	0.0%			
Battery Enclosure Total Cost	(including Profit & Manufacturing)		\$6,607.51					\$6,607.51	0.95%	0.00%

Front and Rear Air Brake Assemblies										
* Front Air Brake Assemblies *	<i>Component Supplier</i>	Foreign	Any city, Country							
ABS	Sub Supplier 1.1	Foreign	Any city, Country	\$0.00	\$300.85	0.0%	5.6%			
Brake Actuation Chamber	Sub Supplier 1.2	Foreign	Any city, Country	\$0.00	\$4,858.79	0.0%	90.6%			
Caliper	Sub Supplier 1.3	Foreign	Any city, Country	\$0.00	\$201.88	0.0%	3.8%			
Front Air Brake Assemblies Material Subtotal				\$0.00	\$5,361.52	0.0%	100.0%			
Front Air Brake Assemblies Total Cost	(including Profit & Manufacturing)		\$5,895.60					\$0.00	0.00%	0.77%
* Rear Air Brake Assemblies *	<i>Component Supplier</i>	Foreign	Any city, Country							
ABS	Sub Supplier 1.1	Foreign	Any city, Country	\$0.00	\$300.85	0.0%	5.6%			
Brake Actuation Chamber	Sub Supplier 1.2	Foreign	Any city, Country	\$0.00	\$4,858.79	0.0%	90.6%			
Caliper	Sub Supplier 1.3	Foreign	Any city, Country	\$0.00	\$201.88	0.0%	3.8%			
Rear Air Brake Assemblies Material Subtotal				\$0.00	\$5,361.52	0.0%	100.0%			
Rear Air Brake Assemblies Total Cost	(including Profit & Manufacturing)		\$5,895.60					\$0.00	0.00%	0.77%

SAMPLE BUY AMERICA DOMESTIC CONTENT WORKSHEET FOR BUS

to calculate domestic and foreign material content for Buy America Audits

System (or Group of Components)	Supplier Name	Manufacturing Location (U.S. or Foreign)	Manufacturing Location (If U.S. - City & State; If Foreign - City & Country)	Component and Subcomponent Material Costs		Subcomponent % of Component and Component Total %		U.S. Content (If U.S. % > 60%, entire 100% component cost is counted)	Component % of Vehicle	
Component				U.S.	Foreign	U.S.	Foreign		U.S.	Foreign
Subcomponent										

* COMPONENTS DEFINED IN 49 CFR 661 APPENDIX B - TYPICAL COMPONENTS OF BUSES *

Air Conditioning Compressor & Evaporator/Condenser Assemblies										
* Air Conditioning Compressor Assemblies *	Component Supplier	U.S.	Any town, State							
Subcomponent 1.1	Sub Supplier 1.1	U.S.	Any town, State	\$445.84	\$0.00	68.6%	0.0%			
Subcomponent 1.2	Sub Supplier 1.2	U.S.	Any town, State	\$204.11	\$0.00	31.4%	0.0%			
A/C Compressor Material Subtotal				\$649.95	\$0.00	100.0%	0.0%			
A/C Compressor Total Cost	(including Profit & Manufacturing)		\$710.42					\$710.42	0.10%	0.00%
* Air Conditioning Evaporator/Condenser Assemblies *	Component Supplier	U.S.	Any town, State							
Subcomponent 1.1	Sub Supplier 1.1	U.S.	Any town, State	\$443.34	\$0.00	52.0%	0.0%			
Subcomponent 1.2	Sub Supplier 1.2	U.S.	Any town, State	\$409.59	\$0.00	48.0%	0.0%			
A/C Evaporator/Condenser Material Subtotal				\$852.93	\$0.00	100.0%	0.0%			
A/C Evaporator/Condenser Total Cost	(including Profit & Manufacturing)		\$487.67					\$487.67	0.07%	0.00%

* Heating Systems *										
Auxiliary Heating Unit	Component Supplier	U.S.	Any town, State							
Subcomponent 1.1	Sub Supplier 1.1	U.S.	Any town, State	\$39,562.16	\$0.00	88.4%	0.0%			
Subcomponent 1.2	Sub Supplier 1.2	U.S.	Any town, State	\$5,198.85	\$0.00	11.6%	0.0%			
Auxiliary Heating Unit Material Subtotal				\$44,761.01	\$0.00	100.0%	0.0%			
Auxiliary Heating Unit Total Cost	(including Profit & Manufacturing)		\$49,237.11					\$49,237.11	7.09%	0.00%

Seating										
* Passenger Seats *	Component Supplier	U.S.	Any town, State							
Seat Frame	Sub Supplier 1.1	U.S.	Any town, State	\$27,890.93	\$0.00	92.0%	0.0%			
Thermoplastic Shell	Sub Supplier 1.1	Foreign	Any city, Country	\$0.00	\$1,287.68	0.0%	4.2%			
Seat Cushion	Sub Supplier 1.2	U.S.	Any town, State	\$1,153.58	\$0.00	3.8%	0.0%			
Passenger Seats Material Subtotal				\$29,044.51	\$1,287.68	95.8%	4.2%			
Passenger Seats Total Cost	(including Profit & Manufacturing)		\$33,948.96					\$33,948.96	4.89%	0.00%
* Driver's Seat Assemblies *	Component Supplier	Foreign	Any city, Country							
Seat Frame	Sub Supplier 1.1	Foreign	Any city, Country	\$0.00	\$2,676.60	0.0%	67.5%			
Cushion	Sub Supplier 1.1	Foreign	Any city, Country	\$0.00	\$825.66	0.0%	20.8%			
Pedestal	Sub Supplier 1.2	Foreign	Any city, Country	\$0.00	\$462.24	0.0%	11.7%			
Driver's Seat Material Subtotal				\$0.00	\$3,964.50	0.0%	100.0%			
Driver's Seat Total Cost	(including Profit & Manufacturing)		\$4,360.95					\$0.00	0.00%	0.57%

SAMPLE BUY AMERICA DOMESTIC CONTENT WORKSHEET FOR BUS

to calculate domestic and foreign material content for Buy America Audits

System (or Group of Components)	Supplier Name	Manufacturing Location (U.S. or Foreign)	Manufacturing Location (If U.S. - City & State; if Foreign - City & Country)	Component and Subcomponent Material Costs		Subcomponent % of Component and Component Total %		U.S. Content (If U.S. % > 60%, entire 100% component cost is counted)	Component % of Vehicle	
Component				U.S.	Foreign	U.S.	Foreign		U.S.	Foreign
Subcomponent										

* COMPONENTS DEFINED IN 49 CFR 661 APPENDIX B - TYPICAL COMPONENTS OF BUSES *

* Window Assemblies *										
Passenger Side Windows	Component Supplier	U.S.	Any town, State							
Glazing	Sub Supplier 1.1	U.S.	Any town, State	\$5,682.60	\$0.00	51.8%	0.0%			
Seal	Sub Supplier 1.2	U.S.	Any town, State	\$1,771.74	\$0.00	16.1%	0.0%			
Frame	Sub Supplier 1.3	U.S.	Any town, State	\$3,524.04	\$0.00	32.1%	0.0%			
Passenger Side Windows Material Subtotal				\$10,978.38	\$0.00	100.0%	0.0%			
Passenger Side Windows Total Cost	(including Profit & Manufacturing)		\$12,076.22					\$12,076.22	1.74%	0.00%
Windshield	Component Supplier	U.S.	Any town, State							
Glazing	Sub Supplier 1.1	U.S.	Any town, State	\$545.87	\$0.00	77.1%	0.0%			
Seal	Sub Supplier 1.2	U.S.	Any town, State	\$162.05	\$0.00	22.9%	0.0%			
Windshield Material Subtotal				\$707.92	\$0.00	100.0%	0.0%			
Windshield Total Cost	(including Profit & Manufacturing)		\$800.46					\$800.46	0.12%	0.00%
Drivers Sliding Window	Component Supplier	U.S.	Any town, State							
Frame	Sub Supplier 1.1	U.S.	Any town, State	\$821.68	\$0.00	79.2%	0.0%			
Glazing	Sub Supplier 1.2	U.S.	Any town, State	\$173.55	\$0.00	16.7%	0.0%			
Latch	Sub Supplier 1.3	U.S.	Any town, State	\$42.74	\$0.00	4.1%	0.0%			
Drivers Sliding Window Material Subtotal				\$1,037.97	\$0.00	100.0%	0.0%			
Drivers Sliding Window Total Cost	(including Profit & Manufacturing)		\$1,203.84					\$1,203.84	0.17%	0.00%
Emergency Windows	Component Supplier	U.S.	Any town, State							
Frame	Sub Supplier 1.1	U.S.	Any town, State	\$3,524.04	\$0.00	28.8%	0.0%			
Glazing	Sub Supplier 1.2	U.S.	Any town, State	\$5,682.60	\$0.00	46.5%	0.0%			
Seal with Removable Strip and Handle	Sub Supplier 1.3	U.S.	Any town, State	\$2,771.74	\$0.00	22.7%	0.0%			
Decals	Sub Supplier 1.4	U.S.	Any town, State	\$242.96	\$0.00	2.0%	0.0%			
Emergency Windows Material Subtotal				\$12,221.34	\$0.00	100.0%	0.0%			
Emergency Windows Total Cost	(including Profit & Manufacturing)		\$14,062.86					\$14,062.86	2.03%	0.00%

* Entrance and Exit Door Assemblies *										
Entrance Front Door	Component Supplier	U.S.	Any town, State							
Door Frame	Sub Supplier 1.1	U.S.	Any town, State	\$3,148.16	\$0.00	44.7%	0.0%			
Door Glass	Sub Supplier 1.2	U.S.	Any town, State	\$778.95	\$0.00	11.1%	0.0%			
Door Hardware	Sub Supplier 1.3	Foreign	Any city, Country	\$862.10	\$675.00	12.2%	9.6%			
Door Trim	Sub Supplier 1.4	Foreign	Any city, Country	\$1,148.30	\$434.03	16.3%	6.2%			
Entrance Door Material Subtotal				\$5,937.51	\$1,109.03	84.3%	15.7%			
Entrance Door Total Cost	(including Profit & Manufacturing)		\$7,739.75					\$7,739.75	1.11%	0.00%
Exit Rear Door	Component Supplier	U.S.	Any town, State							
Door Frame	Sub Supplier 1.1	U.S.	Any town, State	\$24,124.76	\$0.00	68.0%	0.0%			
Door Glass	Sub Supplier 1.2	U.S.	Any town, State	\$4,184.46	\$0.00	11.8%	0.0%			
Door Hardware	Sub Supplier 1.3	Foreign	Any city, Country	\$2,476.55	\$675.00	7.0%	1.9%			
Door Trim	Sub Supplier 1.4	Foreign	Any city, Country	\$3,574.22	\$434.03	10.1%	1.2%			
Exit Door Material Subtotal				\$34,359.99	\$1,109.03	96.9%	3.1%			
Exit Door Total Cost	(including Profit & Manufacturing)		\$37,200.07					\$37,200.07	5.36%	0.00%

APPENDIX A

Domestic Content Calculation Worksheets

SAMPLE BUY AMERICA DOMESTIC CONTENT WORKSHEET FOR BUS

to calculate domestic and foreign material content for Buy America Audits

System (or Group of Components)	Supplier Name	Manufacturing Location (U.S. or Foreign)	Manufacturing Location (If U.S. - City & State; If Foreign - City & Country)	Component and Subcomponent Material Costs		Subcomponent % of Component and Component Total %		U.S. Content (If U.S. % > 60%, entire 100% component cost is counted)	Component % of Vehicle	
Component				U.S.	Foreign	U.S.	Foreign		U.S.	Foreign
Subcomponent										

* COMPONENTS DEFINED IN 49 CFR 661 APPENDIX B - TYPICAL COMPONENTS OF BUSES *

* Door Control Systems *										
Entrance Door Operator & Motor	Component Supplier	Foreign w/ Tariff Ex	Any city, Country							
Motor Assembly	Sub Supplier 1.1	Foreign	Any city, Country	\$440.44	\$0.00	32.5%	0.0%			
Control Module	Sub Supplier 1.2	Foreign	Any city, Country	\$340.22	\$0.00	25.1%	0.0%			
Subcomponent 1.3	Sub Supplier 1.3	Foreign	Any city, Country	\$575.44	\$0.00	42.4%	0.0%			
Entrance Door Operator & Motor Material Subtotal				\$1,356.10	\$0.00	100.0%	0.0%			
Entrance Door Operator & Motor Total Cost	(including Profit & Manufacturing)		\$1,684.48					\$1,356.10	0.20%	0.05%
Entrance Door Control Panel(s)	Component Supplier	U.S.	Any town, State							
Panel	Sub Supplier 1.1	U.S.	Any town, State	\$450.00	\$0.00	50.0%	0.0%			
Switches	Sub Supplier 1.2	U.S.	Any town, State	\$450.00	\$0.00	50.0%	0.0%			
Entrance Door Control Panel(s) Material Subtotal				\$900.00	\$0.00	100.0%	0.0%			
Entrance Door Control Panel(s) Total Cost	(including Profit & Manufacturing)		\$1,000.00					\$1,000.00	0.14%	0.00%
Exit Doors Operator & Motor	Component Supplier	U.S.	Any town, State							
Motor Assembly	Sub Supplier 1.1	U.S.	Any town, State	\$714.76	\$0.00	43.8%	0.0%			
Arm and Linkages	Sub Supplier 1.2	U.S.	Any town, State	\$917.26	\$0.00	56.2%	0.0%			
Exit Doors Operator Material Subtotal				\$1,632.02	\$0.00	100.0%	0.0%			
Exit Doors Operator Total Cost	(including Profit & Manufacturing)		\$786.23					\$786.23	0.11%	0.00%
Exit Door Control Panel(s)	Component Supplier	U.S.	Any town, State							
Panel	Sub Supplier 1.1	U.S.	Any town, State	\$450.00	\$0.00	50.0%	0.0%			
Switches	Sub Supplier 1.2	U.S.	Any town, State	\$450.00	\$0.00	50.0%	0.0%			
Exit Door Control Panel(s) Material Subtotal				\$900.00	\$0.00	100.0%	0.0%			
Exit Door Control Panel(s) Total Cost	(including Profit & Manufacturing)		\$1,000.00					\$1,000.00	0.14%	0.00%

* Destination Sign Assemblies *										
Front Sign	Component Supplier	U.S.	Any town, State							
Enclosure	Sub Supplier 1.1	U.S.	Any town, State	\$12,379.03	\$0.00	89.2%	0.0%			
Glazing	Sub Supplier 1.2	U.S.	Any town, State	\$1,000.00	\$0.00	7.2%	0.0%			
LED Modules	Sub Supplier 1.3	U.S.	Any town, State	\$500.00	\$0.00	3.6%	0.0%			
Front Sign Material Subtotal				\$13,879.03	\$0.00	100.0%	0.0%			
Front Sign Total Cost	(including Profit & Manufacturing)		\$15,116.93					\$15,116.93	2.18%	0.00%
Rear Sign	Component Supplier	U.S.	Any town, State							
Enclosure	Sub Supplier 1.1	U.S.	Any town, State	\$10,379.03	\$0.00	91.2%	0.0%			
Glazing	Sub Supplier 1.2	U.S.	Any town, State	\$1,000.00	\$0.00	8.8%	0.0%			
Rear Sign Material Subtotal				\$11,379.03	\$0.00	100.0%	0.0%			
Rear Sign Total Cost	(including Profit & Manufacturing)		\$12,616.93					\$12,616.93	1.82%	0.00%
Side Sign #1 (Driver's Side)	Component Supplier	U.S.	Any town, State							
Enclosure	Sub Supplier 1.1	U.S.	Any town, State	\$6,354.03	\$0.00	86.4%	0.0%			
Glazing	Sub Supplier 1.2	U.S.	Any town, State	\$1,000.00	\$0.00	13.6%	0.0%			
Side Signs Material Subtotal				\$7,354.03	\$0.00	100.0%	0.0%			
Side Signs Total Cost	(including Profit & Manufacturing)		\$8,389.43					\$8,389.43	1.21%	0.00%
Side Sign #2 (Sidewalk Side)	Component Supplier	U.S.	Any town, State							
Enclosure	Sub Supplier 1.1	U.S.	Any town, State	\$7,129.26	\$0.00	87.7%	0.0%			
Glazing	Sub Supplier 1.2	U.S.	Any town, State	\$1,000.00	\$0.00	12.3%	0.0%			
Side Signs Material Subtotal				\$8,129.26	\$0.00	100.0%	0.0%			
Side Signs Total Cost	(including Profit & Manufacturing)		\$8,845.19					\$8,845.19	1.27%	0.00%

SAMPLE BUY AMERICA DOMESTIC CONTENT WORKSHEET FOR BUS

to calculate domestic and foreign material content for Buy America Audits

System (or Group of Components)	Supplier Name	Manufacturing Location (U.S. or Foreign)	Manufacturing Location (If U.S. - City & State; if Foreign - City & Country)	Component and Subcomponent Material Costs		Subcomponent % of Component and Component Total %		U.S. Content (if U.S. % > 60%, entire 100% component cost is counted)	Component % of Vehicle	
Component				U.S.	Foreign	U.S.	Foreign		U.S.	Foreign
Subcomponent										

* COMPONENTS DEFINED IN 49 CFR 661 APPENDIX B - TYPICAL COMPONENTS OF BUSES *

* Interior Lighting Assemblies *										
Interior Lights	Component Supplier	U.S.	Any town, State							
Light Fixture	Sub Supplier 1.1	U.S.	Any town, State	\$9,768.40	\$0.00	51.4%	0.0%			
Ballast	Sub Supplier 1.2	Foreign	Any city, Country	\$0.00	\$3,356.10	0.0%	17.6%			
Lens	Sub Supplier 1.3	Foreign	Any city, Country	\$0.00	\$5,897.41	0.0%	31.0%			
Interior Lights Material Subtotal				\$9,768.40	\$9,253.51	51.4%	48.6%			
Interior Lights Total Cost	(including Profit & Manufacturing)		\$20,924.10					\$9,768.40	1.41%	1.33%
Operator Indicator Lights	Component Supplier	Foreign	Any city, Country							
Housing	Sub Supplier 1.1	Foreign	Any city, Country	\$0.00	\$2,311.88	0.0%	60.6%			
Indicator Lights	Sub Supplier 1.2	Foreign	Any city, Country	\$0.00	\$1,500.00	0.0%	39.4%			
Operator Indicator Lights Material Subtotal				\$0.00	\$3,811.88	0.0%	100.0%			
Operator Indicator Lights Total Cost	(including Profit & Manufacturing)		\$4,143.06					\$0.00	0.00%	0.55%
Stop Request Status Indicator Light	Component Supplier	Foreign	Any city, Country							
Housing	Sub Supplier 1.1	Foreign	Any city, Country	\$0.00	\$2,311.88	0.0%	60.6%			
Indicator Light	Sub Supplier 1.2	Foreign	Any city, Country	\$0.00	\$1,500.00	0.0%	39.4%			
Stop Request Status Indicator Light Material Subtotal				\$0.00	\$3,811.88	0.0%	100.0%			
Stop Request Status Indicator Light Total Cost	(including Profit & Manufacturing)		\$4,143.06					\$0.00	0.00%	0.55%

Exterior Lighting										
Headlights	Component Supplier	U.S.	Any town, State							
Subcomponent 1.1	Sub Supplier 1.1	U.S.	Any town, State	\$765.79	\$0.00	100.0%	0.0%			
Subcomponent 1.2	Sub Supplier 1.2	U.S.	Any town, State	\$0.00	\$0.00	0.0%	0.0%			
Subcomponent 1.3	Sub Supplier 1.3	U.S.	Any town, State	\$0.00	\$0.00	0.0%	0.0%			
Subcomponent 1.4	Sub Supplier 1.4	U.S.	Any town, State	\$0.00	\$0.00	0.0%	0.0%			
Headlights Material Subtotal				\$765.79	\$0.00	100.0%	0.0%			
Headlights Total Cost	(including Profit & Manufacturing)		\$842.37					\$842.37	0.12%	0.00%
Tail Lights	Component Supplier	Foreign	Any city, Country							
Subcomponent 1.1	Sub Supplier 1.1	Foreign	Any city, Country	\$0.00	\$2,496.62	0.0%	58.1%			
Subcomponent 1.2	Sub Supplier 1.2	Foreign	Any city, Country	\$0.00	\$500.00	0.0%	11.6%			
Subcomponent 1.3	Sub Supplier 1.3	Foreign	Any city, Country	\$0.00	\$600.00	0.0%	14.0%			
Subcomponent 1.4	Sub Supplier 1.4	Foreign	Any city, Country	\$0.00	\$700.00	0.0%	16.3%			
Tail Lights Material Subtotal				\$0.00	\$4,296.62	0.0%	100.0%			
Tail Lights Total Cost	(including Profit & Manufacturing)		\$4,846.28					\$0.00	0.00%	0.62%
Turn Indicator Lights	Component Supplier	Foreign	Any city, Country							
Subcomponent 1.1	Sub Supplier 1.1	Foreign	Any city, Country	\$0.00	\$2,496.62	0.0%	58.1%			
Subcomponent 1.2	Sub Supplier 1.2	Foreign	Any city, Country	\$0.00	\$500.00	0.0%	11.6%			
Subcomponent 1.3	Sub Supplier 1.3	Foreign	Any city, Country	\$0.00	\$600.00	0.0%	14.0%			
Subcomponent 1.4	Sub Supplier 1.4	Foreign	Any city, Country	\$0.00	\$700.00	0.0%	16.3%			
Turn Indicator Lights Material Subtotal				\$0.00	\$4,296.62	0.0%	100.0%			
Turn Indicator Lights Total Cost	(including Profit & Manufacturing)		\$4,846.28					\$0.00	0.00%	0.62%

SAMPLE BUY AMERICA DOMESTIC CONTENT WORKSHEET FOR BUS

to calculate domestic and foreign material content for Buy America Audits

System (or Group of Components)	Supplier Name	Manufacturing Location (U.S. or Foreign)	Manufacturing Location (If U.S. - City & State; if Foreign - City & Country)	Component and Subcomponent Material Costs		Subcomponent % of Component and Component Total %		U.S. Content (If U.S. % > 60%, entire 100% component cost is counted)	Component % of Vehicle	
Component				U.S.	Foreign	U.S.	Foreign		U.S.	Foreign
Subcomponent										

* COMPONENTS DEFINED IN 49 CFR 661 APPENDIX B - TYPICAL COMPONENTS OF BUSES *

* Front and Rear End Cap Assemblies *										
Front End Cap	Component Supplier	U.S.	Any town, State							
Subcomponent 1.1	Sub Supplier 1.1	U.S.	Any town, State	\$1,440.79	\$0.00	59.0%	0.0%			
Subcomponent 1.2	Sub Supplier 1.2	U.S.	Any town, State	\$1,000.00	\$0.00	41.0%	0.0%			
Front End Cap Material Subtotal				\$2,440.79	\$0.00	100.0%	0.0%			
Front End Cap Total Cost	(including Profit & Manufacturing)		\$2,584.87					\$2,584.87	0.37%	0.00%
Rear End Cap	Component Supplier	U.S.	Any town, State							
Subcomponent 1.1	Sub Supplier 1.1	U.S.	Any town, State	\$1,042.54	\$0.00	51.0%	0.0%			
Subcomponent 1.2	Sub Supplier 1.2	U.S.	Any town, State	\$1,000.00	\$0.00	49.0%	0.0%			
Rear End Cap Material Subtotal				\$2,042.54	\$0.00	100.0%	0.0%			
Rear End Cap Total Cost	(including Profit & Manufacturing)		\$2,146.79					\$2,146.79	0.31%	0.00%

* Front and Rear Bumper Assemblies *										
Front Bumper	Component Supplier	U.S.	Any town, State							
Bumper Cover	Sub Supplier 1.1	U.S.	Any town, State	\$1,200.76	\$0.00	78.9%	0.0%			
Mounting Brackets	Sub Supplier 1.2	Foreign	Any city, Country	\$0.00	\$321.64	0.0%	21.1%			
Front Bumper Material Subtotal				\$1,200.76	\$321.64	78.9%	21.1%			
Front Bumper Total Cost	(including Profit & Manufacturing)		\$1,674.63					\$1,674.63	0.24%	0.00%
Rear Bumper	Component Supplier	U.S.	Any town, State							
Bumper Cover	Sub Supplier 1.1	U.S.	Any town, State	\$930.76	\$0.00	83.3%	0.0%			
Mounting Brackets	Sub Supplier 1.2	Foreign	Any city, Country	\$0.00	\$186.64	0.0%	16.7%			
Rear Bumper Material Subtotal				\$930.76	\$186.64	83.3%	16.7%			
Rear Bumper Total Cost	(including Profit & Manufacturing)		\$1,229.13					\$1,229.13	0.18%	0.00%

* Specialty Steel (Structural Steel Tubing, Etc.) Aluminum Extrusions *										
Specialty Steel				\$0.00	\$0.00	#DIV/0!	#DIV/0!			
Specialty Steel Material Subtotal				\$0.00	\$0.00	#DIV/0!	#DIV/0!			
Specialty Steel Total Cost	(including Profit & Manufacturing)		\$0.00					\$0.00	0.00%	0.00%
Structural Steel Tubing	Component Supplier	Foreign	Any city, Country							
Subcomponent 1.1	Sub Supplier 1.1	Foreign	Any city, Country	\$0.00	\$17,965.80	0.0%	100.0%			
Structural Steel Tubing Material Subtotal				\$0.00	\$17,965.80	0.0%	100.0%			
Structural Steel Tubing Total Cost	(including Profit & Manufacturing)		\$19,762.38					\$0.00	0.00%	2.59%

SAMPLE BUY AMERICA DOMESTIC CONTENT WORKSHEET FOR BUS

to calculate domestic and foreign material content for Buy America Audits

System (or Group of Components)	Supplier Name	Manufacturing Location (U.S. or Foreign)	Manufacturing Location (If U.S. - City & State; if Foreign - City & Country)	Component and Subcomponent Material Costs		Subcomponent % of Component and Component Total %		U.S. Content (If U.S. % > 60%, entire 100% component cost is counted)	Component % of Vehicle	
Component				U.S.	Foreign	U.S.	Foreign		U.S.	Foreign
Subcomponent										

* COMPONENTS DEFINED IN 49 CFR 661 APPENDIX B - TYPICAL COMPONENTS OF BUSES *

* Aluminum, Steel, or Fiberglass Exterior Panels *										
Aluminum Exterior Panels	Component Supplier	Foreign	Any city, Country							
Subcomponent 1.1	Sub Supplier 1.1	Foreign	Any city, Country	\$0.00	\$2,345.02	0.0%	100.0%			
Aluminum Panels Material Subtotal				\$0.00	\$2,345.02	0.0%	100.0%			
Aluminum Panels Total Cost	(including Profit & Manufacturing)		\$2,579.52					\$0.00	0.00%	0.34%
Steel Exterior Panels	Component Supplier	U.S.	Any town, State							
Subcomponent 1.1	Sub Supplier 1.1	U.S.	Any town, State	\$6,450.50	\$0.00	100.0%	0.0%			
Steel Panels Material Subtotal				\$6,450.50	\$0.00	100.0%	0.0%			
Steel Panels Total Cost	(including Profit & Manufacturing)		\$7,095.55					\$7,095.55	1.02%	0.00%
Fiberglass Exterior Panels	Component Supplier	Foreign	Any city, Country							
Subcomponent 1.1	Sub Supplier 1.1	Foreign	Any city, Country	\$0.00	\$5,054.54	0.0%	83.5%			
Subcomponent 1.2	Sub Supplier 1.2	Foreign	Any city, Country	\$0.00	\$500.00	0.0%	8.3%			
Subcomponent 1.3	Sub Supplier 1.3	Foreign	Any city, Country	\$0.00	\$500.00	0.0%	8.3%			
Fiberglass Panels Material Subtotal				\$0.00	\$6,054.54	0.0%	100.0%			
Fiberglass Panels Total Cost	(including Profit & Manufacturing)		\$6,559.99					\$0.00	0.00%	0.87%

* Interior Trim, Flooring, and Floor Coverings *										
Interior Trim	Component Supplier	U.S.	Any town, State							
Subcomponent 1.1	Sub Supplier 1.1	U.S.	Any town, State	\$822.29	\$0.00	100.0%	0.0%			
Interior Trim Material Subtotal				\$822.29	\$0.00	100.0%	0.0%			
Interior Trim Total Cost	(including Profit & Manufacturing)		\$904.51					\$904.51	0.13%	0.00%
Interior Panels	Component Supplier	Foreign	Any city, Country							
Subcomponent 1.1	Sub Supplier 1.1	Foreign	Any city, Country	\$0.00	\$5,867.10	0.0%	100.0%			
Interior Panels Material Subtotal				\$0.00	\$5,867.10	0.0%	100.0%			
Interior Panels Total Cost	(including Profit & Manufacturing)		\$6,453.81					\$0.00	0.00%	0.84%
Floor Panels	Component Supplier	Foreign	Any city, Country							
Subcomponent 1.1	Sub Supplier 1.1	Foreign	Any city, Country	\$0.00	\$3,015.90	0.0%	100.0%			
Floor Panels Material Subtotal				\$0.00	\$3,015.90	0.0%	100.0%			
Floor Panels Total Cost	(including Profit & Manufacturing)		\$3,317.49					\$0.00	0.00%	0.43%
Floor Covering	Component Supplier	U.S.	Any town, State							
Subcomponent 1.1	Sub Supplier 1.1	U.S.	Any town, State	\$1,357.97	\$0.00	100.0%	0.0%			
Floor Covering Material Subtotal				\$1,357.97	\$0.00	100.0%	0.0%			
Floor Covering Total Cost	(including Profit & Manufacturing)		\$1,493.76					\$1,493.76	0.22%	0.00%

SAMPLE BUY AMERICA DOMESTIC CONTENT WORKSHEET FOR BUS

to calculate domestic and foreign material content for Buy America Audits

System (or Group of Components)	Supplier Name	Manufacturing Location (U.S. or Foreign)	Manufacturing Location (If U.S. - City & State; if Foreign - City & Country)	Component and Subcomponent Material Costs		Subcomponent % of Component and Component Total %		U.S. Content (If U.S. % > 60%, entire 100% component cost is counted)	Component % of Vehicle	
Component				U.S.	Foreign	U.S.	Foreign		U.S.	Foreign
Subcomponent										

* COMPONENTS DEFINED IN 49 CFR 661 APPENDIX B - TYPICAL COMPONENTS OF BUSES *

Fuel System										
Fuel Tank	Component Supplier	U.S.	Any city, Country							
Tank	Sub Supplier 1.1	U.S.	Any town, State	\$36,174.33	\$0.00	99.7%	0.0%			
Fuel Level Sensor	Sub Supplier 1.2	U.S.	Any town, State	\$100.00	\$0.00	0.3%	0.0%			
Fuel System Material Subtotal				\$36,274.33	\$0.00	100.0%	0.0%			
Fuel System Total Cost	(including Profit & Manufacturing)		\$39,791.76					\$39,791.76	5.73%	0.00%
Fuel Tank Rack	Component Supplier	Foreign	Any city, Country							
Frame Members	Sub Supplier 1.1	Foreign	Any city, Country	\$0.00	\$4,932.90	0.0%	95.7%			
Tank Straps	Sub Supplier 1.2	Foreign	Any city, Country	\$0.00	\$224.22	0.0%	4.3%			
Fuel Tank Rack Material Subtotal				\$0.00	\$5,157.12	0.0%	100.0%			
Fuel Tank Rack Total Cost	(including Profit & Manufacturing)		\$5,426.19					\$0.00	0.00%	0.74%
Fuel Filter	Component Supplier	U.S.	Any town, State							
Housing	Sub Supplier 1.1	U.S.	Any town, State	\$536.15	\$0.00	84.3%	0.0%			
Cartridge	Sub Supplier 1.2	U.S.	Any town, State	\$100.00	\$0.00	15.7%	0.0%			
Fuel Filter Material Subtotal				\$636.15	\$0.00	100.0%	0.0%			
Fuel Filter Total Cost	(including Profit & Manufacturing)		\$589.77					\$589.77	0.08%	0.00%
Lines & Connectors	Component Supplier	Foreign	Any city, Country							
Fuel Line Tubing	Sub Supplier 1.1	Foreign	Any city, Country	\$0.00	\$12,436.94	0.0%	97.1%			
Fittings and Connectors	Sub Supplier 1.2	Foreign	Any city, Country	\$0.00	\$376.67	0.0%	2.9%			
Lines & Connectors Material Subtotal				\$0.00	\$12,813.61	0.0%	100.0%			
Lines & Connectors Total Cost	(including Profit & Manufacturing)		\$13,680.64					\$0.00	0.00%	1.85%
CNG Tanks										
				\$0.00	\$0.00	#DIV/0!	#DIV/0!			
				\$0.00	\$0.00	#DIV/0!	#DIV/0!			
				\$0.00	\$0.00	#DIV/0!	#DIV/0!			
CNG Tanks Material Subtotal				\$0.00	\$0.00	#DIV/0!	#DIV/0!			
CNG Tanks Total Cost	(including Profit & Manufacturing)		\$0.00					\$0.00	0.00%	0.00%

Articulated Joint and Bellows										
Joint Assembly	Component Supplier	Foreign	Any city, Country							
Articulation Joint	Sub Supplier 1.1	Foreign	Any city, Country	\$0.00	\$12,000.00	0.0%	54.5%			
Deck Plates	Sub Supplier 1.2	Foreign	Any city, Country	\$0.00	\$5,000.00	0.0%	22.7%			
Pistons	Sub Supplier 1.3	Foreign	Any city, Country	\$0.00	\$5,000.00	0.0%	22.7%			
Joint Assembly Material Subtotal				\$0.00	\$22,000.00	0.0%	100.0%			
Joint Assembly Total Cost	(including Profit & Manufacturing)		\$24,534.43					\$0.00	0.00%	3.17%
Bellows	Component Supplier	Foreign	Any city, Country							
Bows	Sub Supplier 1.1	Foreign	Any city, Country	\$0.00	\$5,000.00	0.0%	45.5%			
Fabric	Sub Supplier 1.2	Foreign	Any city, Country	\$0.00	\$6,000.00	0.0%	54.5%			
Bellows Material Subtotal				\$0.00	\$11,000.00	0.0%	100.0%			
Bellows Total Cost	(including Profit & Manufacturing)		\$12,423.51					\$0.00	0.00%	1.58%

SAMPLE BUY AMERICA DOMESTIC CONTENT WORKSHEET FOR BUS

to calculate domestic and foreign material content for Buy America Audits

System (or Group of Components)	Supplier Name	Manufacturing Location (U.S. or Foreign)	Manufacturing Location (If U.S. - City & State; If Foreign - City & Country)	Component and Subcomponent Material Costs		Subcomponent % of Component and Component Total %		U.S. Content (If U.S. % > 60%, entire 100% component cost is counted)	Component % of Vehicle	
Component				U.S.	Foreign	U.S.	Foreign		U.S.	Foreign
Subcomponent										

* COMPONENTS DEFINED IN 49 CFR 661 APPENDIX B - TYPICAL COMPONENTS OF BUSES *

Communication Equipment										
Public Address (PA) Equipment	Component Supplier	Foreign	Any city, Country							
Subcomponent 1.1	Sub Supplier 1.1	Foreign	Any city, Country	\$0.00	\$6,858.27	0.0%	100.0%			
PA Equipment Material Subtotal				\$0.00	\$6,858.27	0.0%	100.0%			
PA Equipment Total Cost	(including Profit & Manufacturing)		\$7,544.10					\$0.00	0.00%	0.99%
Security Camera Equipment	Component Supplier	U.S.	Any town, State							
				\$13,187.08	\$0.00	100.0%	0.0%			
Security Camera Equipment Material Subtotal				\$13,187.08	\$0.00	100.0%	0.0%			
Security Camera Equipment Total Cost	(including Profit & Manufacturing)		\$15,857.27					\$15,857.27	2.28%	0.00%
Radio	Component Supplier	Foreign	Any city, Country							
Subcomponent 1.1	Sub Supplier 1.1	Foreign	Any city, Country	\$0.00	\$335.14	0.0%	100.0%			
Radio Material Subtotal				\$0.00	\$335.14	0.0%	100.0%			
Radio Total Cost	(including Profit & Manufacturing)		\$368.65					\$0.00	0.00%	0.05%
Wi-Fi System	Component Supplier	U.S.	Any town, State							
Wi-Fi Router	Sub Supplier 1.1	U.S.	Any town, State	\$1,355.40	\$0.00	70.1%	0.0%			
Ethernet Switches	Sub Supplier 1.2	U.S.	Any town, State	\$180.90	\$0.00	9.4%	0.0%			
Power Over Ethernet (POE) Switch	Sub Supplier 1.3	U.S.	Any town, State	\$396.23	\$0.00	20.5%	0.0%			
Wi-Fi System Material Subtotal				\$1,932.53	\$0.00	100.0%	0.0%			
Wi-Fi System Total Cost	(including Profit & Manufacturing)		\$2,125.78					\$2,125.78	0.31%	0.00%

Passenger Lift & Ramp										
Passenger Lift	Component Supplier	U.S.	Any town, State							
Enclosure/Frame	Sub Supplier 1.1	U.S.	Any town, State	\$515.09	\$0.00	8.8%	0.0%			
Motor	Sub Supplier 1.2	Foreign	Any city, Country	\$0.00	\$4,832.33	0.0%	82.6%			
Lift Deck Assembly	Sub Supplier 1.3	Foreign	Any city, Country	\$0.00	\$500.00	0.0%	8.6%			
Passenger Lift Material Subtotal				\$515.09	\$5,332.33	8.8%	91.2%			
Passenger Lift Total Cost	(including Profit & Manufacturing)		\$5,882.16					\$515.09	0.07%	0.77%
Passenger Ramp	Component Supplier	U.S.	Any town, State							
Ramp Plate	Sub Supplier 1.1	U.S.	Any town, State	\$17,616.67	\$0.00	94.6%	0.0%			
Motor	Sub Supplier 1.2	U.S.	Any town, State	\$500.00	\$0.00	2.7%	0.0%			
Cam and Linkage	Sub Supplier 1.3	U.S.	Any town, State	\$500.00	\$0.00	2.7%	0.0%			
Passenger Ramp Material Subtotal				\$18,616.67	\$0.00	100.0%	0.0%			
Passenger Ramp Total Cost	(including Profit & Manufacturing)		\$19,778.34					\$19,778.34	2.85%	0.00%

SAMPLE BUY AMERICA DOMESTIC CONTENT WORKSHEET FOR BUS

to calculate domestic and foreign material content for Buy America Audits

System (or Group of Components)	Supplier Name	Manufacturing Location (U.S. or Foreign)	Manufacturing Location (if U.S. - City & State; if Foreign - City & Country)	Component and Subcomponent Material Costs		Subcomponent % of Component and Component Total %		U.S. Content (if U.S. % > 60%, entire 100% component cost is counted)	Component % of Vehicle	
Component				U.S.	Foreign	U.S.	Foreign		U.S.	Foreign
Subcomponent										

* COMPONENTS DEFINED IN 49 CFR 661 APPENDIX B - TYPICAL COMPONENTS OF BUSES *

Mirrors (Interior & Exterior)										
Interior Mirror	Component Supplier	U.S.	Any town, State							
Mirror Frame	Sub Supplier 1.1	U.S.	Any town, State	\$1,055.03	\$0.00	77.9%	0.0%			
Mounting Base	Sub Supplier 1.2	U.S.	Any town, State	\$100.00	\$0.00	7.4%	0.0%			
Mirror	Sub Supplier 1.3	U.S.	Any town, State	\$200.00	\$0.00	14.8%	0.0%			
Interior Mirrors Material Subtotal				\$1,355.03	\$0.00	100.0%	0.0%			
Interior Mirrors Total Cost	(including Profit & Manufacturing)		\$1,478.54					\$1,478.54	0.21%	0.00%
Exterior Mirror	Component Supplier	U.S.	Any town, State							
Mirror Frame	Sub Supplier 1.1	U.S.	Any town, State	\$600.00	\$0.00	80.0%	0.0%			
Mounting Base	Sub Supplier 1.2	U.S.	Any town, State	\$50.00	\$0.00	6.7%	0.0%			
Mirror	Sub Supplier 1.3	U.S.	Any town, State	\$100.00	\$0.00	13.3%	0.0%			
Exterior Mirrors Material Subtotal				\$750.00	\$0.00	100.0%	0.0%			
Exterior Mirrors Total Cost	(including Profit & Manufacturing)		\$922.19					\$922.19	0.13%	0.00%

Examples of Other Miscellaneous Components										
Fire Suppression	Component Supplier	U.S.	Any town, State							
Tank	Sub Supplier 1.1	U.S.	Any town, State	\$9,996.35	\$0.00	98.5%	0.0%			
Mounting Bracket	Sub Supplier 1.2	U.S.	Any town, State	\$50.00	\$0.00	0.5%	0.0%			
Tubing and Nozzles	Sub Supplier 1.3	U.S.	Any town, State	\$100.00	\$0.00	1.0%	0.0%			
Fire System Material Subtotal				\$10,146.35	\$0.00	100.0%	0.0%			
Fire System Total Cost	(including Profit & Manufacturing)		\$10,995.98					\$10,995.98	1.58%	0.00%
Fare Box	Component Supplier	U.S.	Any town, State							
Fare Box Enclosure	Sub Supplier 1.1	U.S.	Any town, State	\$24,785.25	\$0.00	99.4%	0.0%			
Coin and Bill Module	Sub Supplier 1.2	U.S.	Any town, State	\$50.00	\$0.00	0.2%	0.0%			
Transfer Printer	Sub Supplier 1.3	U.S.	Any town, State	\$100.00	\$0.00	0.4%	0.0%			
Fare box Material Subtotal				\$24,935.25	\$0.00	100.0%	0.0%			
Fare box Total Cost	(including Profit & Manufacturing)		\$28,263.77					\$28,263.77	4.07%	0.00%
Bike Rack & Mounting Equipment	Component Supplier	Foreign	Any city, Country							
Frame	Sub Supplier 1.1	Foreign	Any city, Country	\$0.00	\$6,535.28	0.0%	79.8%			
Deployed Sensor	Sub Supplier 1.2	Foreign	Any city, Country	\$0.00	\$1,651.52	0.0%	20.2%			
Bike Rack Material Subtotal				\$0.00	\$8,186.81	0.0%	100.0%			
Bike Rack Total Cost	(including Profit & Manufacturing)		\$9,005.49					\$0.00	0.00%	1.18%
Windshield Wipers	Component Supplier	U.S.	Any town, State							
Wiper Motor	Sub Supplier 1.1	U.S.	Any town, State	\$647.12	\$0.00	38.1%	0.0%			
Harness	Sub Supplier 1.2	U.S.	Any town, State	\$1,052.12	\$0.00	61.9%	0.0%			
Windshield Wipers Material Subtotal				\$1,699.25	\$0.00	100.0%	0.0%			
Windshield Wipers Total Cost	(including Profit & Manufacturing)		\$1,869.17					\$1,869.17	0.27%	0.00%
Windshield Washers	Component Supplier	U.S.	Any town, State							
Windshield Washer Reservoir	Sub Supplier 1.1	U.S.	Any town, State	\$647.12	\$0.00	38.1%	0.0%			
Tubing and Nozzles	Sub Supplier 1.2	U.S.	Any town, State	\$1,052.12	\$0.00	61.9%	0.0%			
Windshield Washers Material Subtotal				\$1,699.25	\$0.00	100.0%	0.0%			
Windshield Washers Total Cost	(including Profit & Manufacturing)		\$1,869.17					\$1,869.17	0.27%	0.00%

SAMPLE BUY AMERICA DOMESTIC CONTENT WORKSHEET FOR BUS

to calculate domestic and foreign material content for Buy America Audits

System (or Group of Components)	Supplier Name	Manufacturing Location (U.S. or Foreign)	Manufacturing Location (If U.S. - City & State; if Foreign - City & Country)	Component and Subcomponent Material Costs		Subcomponent % of Component and Component Total %		U.S. Content (If U.S. % > 60%, entire 100% component cost is counted)	Component % of Vehicle	
Component				U.S.	Foreign	U.S.	Foreign		U.S.	Foreign
Subcomponent										

* COMPONENTS DEFINED IN 49 CFR 661 APPENDIX B - TYPICAL COMPONENTS OF BUSES *

Examples of Other Miscellaneous Components										
Stanchions & Handrails	<i>Component Supplier</i>	U.S.	Any town, State							
Stanchions Pole	Sub Supplier 1.1	U.S.	Any town, State	\$1,521.05	\$0.00	42.4%	0.0%			
Mounting Bracket	Sub Supplier 1.2	U.S.	Any town, State	\$2,064.62	\$0.00	57.6%	0.0%			
Stanchions & Handrails Material Subtotal				\$3,585.67	\$0.00	100.0%	0.0%			
Stanchions & Handrails Total Cost	(including Profit & Manufacturing)		\$3,944.23					\$3,944.23	0.57%	0.00%
Wire/Cable	<i>Component Supplier</i>	Foreign	Any city, Country							
Subcomponent 1.1	Sub Supplier 1.1	Foreign	Any city, Country	\$0.00	\$6,248.41	0.0%	48.1%			
Subcomponent 1.2	Sub Supplier 1.2	Foreign	Any city, Country	\$0.00	\$6,746.90	0.0%	51.9%			
Wire/Cable Material Subtotal				\$0.00	\$12,995.30	0.0%	100.0%			
Wire/Cable Total Cost	(including Profit & Manufacturing)		\$14,294.83					\$0.00	0.00%	1.87%
Harnesses	<i>Component Supplier</i>	Foreign	Any city, Country							
Subcomponent 1.1	Sub Supplier 1.1	Foreign	Any city, Country	\$0.00	\$2,000.00	0.0%	40.0%			
Subcomponent 1.2	Sub Supplier 1.2	Foreign	Any city, Country	\$0.00	\$3,000.00	0.0%	60.0%			
Harnesses Material Subtotal				\$0.00	\$5,000.00	0.0%	100.0%			
Harnesses Total Cost	(including Profit & Manufacturing)		\$6,000.00					\$0.00	0.00%	0.72%
Electrical Panels	<i>Component Supplier</i>	Foreign	Any city, Country							
Subcomponent 1.1	Sub Supplier 1.1	Foreign	Any city, Country	\$0.00	\$15,999.26	0.0%	100.0%			
Electrical Panels Material Subtotal				\$0.00	\$15,999.26	0.0%	100.0%			
Electrical Panels Total Cost	(including Profit & Manufacturing)		\$17,599.18					\$0.00	0.00%	2.30%
Hardware	<i>Component Supplier</i>	Foreign	Any city, Country							
Lugs	Sub Supplier 1.2	Foreign	Any city, Country	\$0.00	\$4,325.20	0.0%	100.0%			
Hardware Material Subtotal				\$0.00	\$4,325.20	0.0%	100.0%			
Hardware Total Cost	(including Profit & Manufacturing)		\$4,757.72					\$0.00	0.00%	0.62%
Paint	<i>Component Supplier</i>	U.S.	Any town, State							
Subcomponent 1.1	Sub Supplier 1.1	U.S.	Any town, State	\$3,889.55	\$0.00	100.0%	0.0%			
Paint Material Subtotal				\$3,889.55	\$0.00	100.0%	0.0%			
Paint Total Cost	(including Profit & Manufacturing)		\$4,668.62					\$4,668.62	0.67%	0.00%
Decals	<i>Component Supplier</i>	Foreign	Any city, Country							
Subcomponent 1.1	Sub Supplier 1.1	Foreign	Any city, Country	\$0.00	\$6,467.18	0.0%	100.0%			
Decals Material Subtotal				\$0.00	\$6,467.18	0.0%	100.0%			
Decals Total Cost	(including Profit & Manufacturing)		\$7,113.89					\$0.00	0.00%	0.93%

Totals										
Vehicle Material Subtotal				\$457,361.29	\$237,096.17				65.86%	34.14%
Vehicle Material Total Cost				\$694,457.46						
Vehicle Total Cost (including Profit & Manufacturing)				\$763,913.12						

Appendix B Checklists

B.1 Proposal Compliance Checklist

KEY TRANSIT AGENCY SOLICITATION REQUIREMENTS	CHECK OF ROLLING STOCK MANUFACTURER'S COMPLIANCE	KEY COMMENTS
COMPLIANCE WITH KEY FEDERAL REQUIREMENTS		
Buy America	YES	Pre-Award Certificate on file
Pre-Award and Post-Delivery Audit	YES	Pre-Award Audit underway
Lobbying	YES	No exceptions taken
Providing Fraudulent Information, False Statements and Related Acts	YES	No exceptions taken
Civil Rights	YES	No exceptions taken
Disadvantage Business Enterprises	YES	No exceptions taken
Americans with Disability Act	YES	No exceptions taken
Compliance with ALL other required federal provisions	YES	No exceptions taken
COMPLIANCE WITH ALL TRANSIT AGENCY SPECIAL PROVISIONS		
Terms of schedule and liquidated damages	YES	No exceptions taken
Shipment and delivery	YES	No exceptions taken
City Inspection and testing	YES	No exceptions taken
Acceptance	YES	No exceptions taken
Payment provisions	YES	Agreed to additional 2% on payment item for completion of Pilot Car Testing.
Spare parts	YES	Negotiated Spare parts items
Warranty terms 2 years	YES	Negotiated terms for extended warranties of components
COMPLIANCE WITH ALL TECHNICAL SPECIFICATIONS REQUIREMENTS		
Carbody/bus body/trucks and axles	YES	No exceptions taken
Cab/drivers area and controls	YES	No exceptions taken
Passenger doors	YES	No exceptions taken
HVAC	YES	No exceptions taken
Auxiliary electric equipment	YES	No exceptions taken
Propulsion	YES	Agreed to reduce top speed from 70mph to 50mph at 10% grades at GVWR. See Addendum 2.
Brakes	YES	No exceptions taken
Communications	YES	No exceptions taken
Train control (rail vehicles only)	YES	No exceptions taken
Monitoring and diagnostics	YES	No exceptions taken
Materials and overall work quality	YES	No exceptions taken
Software	YES	No exceptions taken
Manuals and training	YES	Manuals and Training hours and terms negotiated.

B.2 Pre-Award Checklists

B.2.1 Recipient at Pre-Award Audit

Pre-Award Audit (Before signing Contract with Bidder)	Buy America Certification
	A. ☐ Reviewed and Verified 60% Domestic Content; AND ☐ Reviewed and Verified Proposed U.S. Final Assembly, Location, Operations, and Total Cost OR B. ☐ Requested and Received Buy America Waiver
	Purchaser's Requirements Certification
	A. ☐ Checked Bid Specification Compliance with Solicitation Specifications; AND ☐ Completed a Manufacturer Capability and Capacity Review
	FMVSS Certifications (Buses Only): Requested and Received Manufacturer's letter stating:
	A. ☐ The information to be included on the FMVSS Stickers OR B. ☐ The Buses Are Not Subject to FMVSS

B.2.2 Manufacturer at Pre-Award Audit

Pre-Award Audit (Before signing Contract with Bidder)	Buy America Certification
	A. ☐ Prepared and provided to recipient the Domestic Content Worksheet; AND ☐ Prepared and provided U.S. Final Assembly, Location, Operations, and Total Cost OR B. ☐ Submitted a Buy America Waiver
	Purchaser's Requirements Certification
	A. ☐ Responded to recipient solicitation clearly indicating Bid Specification Compliance with Solicitation Specifications; AND ☐ Responded to sections in the Solicitation regarding Manufacturer Capability and Capacity Review
	FMVSS Certifications (Buses Only): Prepared letter stating:
	A. ☐ The information to be included on the FMVSS Stickers OR B. ☐ The Buses Are Not Subject to FMVSS

B.2.3 Supplier at Pre-Award Audit

Pre-Award Audit (Before signing Contract with Bidder)	Buy America Certification
	A. ☐ Prepared and provided to Rolling Stock Manufacturer the Component Supplier Buy America Certification including the location of component manufacture and the percent domestic and foreign content of each subcomponent.

B.2.4 Pre-Award Audit Purchaser's Requirements Certification for Recipients

For Pre-award Purchaser's Requirements Certification, the recipient shall verify that the rolling stock the recipient is contracting for is the same product described in the purchaser's solicitation specification, and the proposed manufacturer is a responsible manufacturer with the capability to produce a vehicle that meets the recipient's solicitation specification. Recipients may employ a combination of different departments or third parties to conduct these verifications. In such case, the party responsible for verification shall sign/initial the items in their scope. The following items represent a checklist of the tasks to complete the pre-award purchaser's requirements audit.

Activity	Supporting Document	Verified
Part 1		
Comparison of rolling stock manufacturer's specification with purchaser's solicitation specification	• Recipient's checklist for comparison of manufacturer's specification with solicitation specification;	☐
	• Manufacturer's supporting documents such as its proposal, manufacturer and supplier specifications, product brochures, technical data sheets, drawings, and bills of material.	☐
Part 2		
Assessment of manufacturer's capability	• Recipient's checklist for manufacturer's capability assessment;	☐
	• Manufacturer's supporting documents such as descriptions of facilities and equipment, plant output capacity, facility layout drawing/flow diagram, production line layout/flow diagram, staffing counts by craft, QA/QC Plan, mobilization plan, list of concurrent work, list of past performance on similar projects, financial records, and other documents;	☐
	• Major supplier/subcontractor data same as previous item;	☐
	• Manufacturer's project level plans such as QA/QC plan, schedule, supplier management plan, and document/configuration control plan.	☐
Reviewed and accepted by:		
Signature		Date
Title		

B.2.5 Comparison of Manufacturer's Specification with Purchaser's Solicitation Specification

As part of the Pre-award Purchaser's Requirements Certification process, the recipient shall verify that the rolling stock the recipient is contracting for is the same product described in the purchaser's solicitation specification. The following items would typically be considered for this review.

Solicitation Specification Item		Remark	Manufacturer's Specification Complies?
1.	Carbody: structure, high/low boarding, diaphragm		☐
2.	Windows: windshield, passenger side windows, emergency windows, door windows, sliding sash		☐
3.	Interior: flooring, seats, wheelchair securement, bicycle storage, luggage racks, exit path marking (as applicable)		☐
4.	Trucks/axles, sanding equipment (if required)		☐
5.	Propulsion equipment		☐
6.	Brake equipment; wheel slip/slide, parking brake		☐
7.	Auxiliary electrical equipment		☐
8.	Cab/driver's area controls and equipment		☐
9.	HVAC		☐
10.	Doors and door control system with ADA audible alarm and warning lights		☐
11.	Lighting: interior, emergency, exterior		☐
12.	Communications		☐
13.	Toilet room; water and waste system (if required)		☐
14.	Coupler/draft gear (rail vehicles only)		☐
15.	Intercar trainlines/receptacles (rail vehicles only)		☐
16.	Train control/cab signal equipment (rail vehicles only)		☐
17.	Monitoring and diagnostics		☐
18.	Materials and workmanship standards		☐
19.	Software		☐
20.	Manuals and training		☐
Other Provisions			☐
21.	Compliance with applicable Federal, State, local regulations		☐
22.	Buy America		☐
23.	Warranty terms		☐
Reviewed and accepted by:			
Signature		Date	
Title			

B.3 Post-Delivery Checklists

B.3.1 Recipient at Post-Delivery Audit

Post-Delivery Audit (Before using the Rolling Stock in Transit Service)	Buy America Certification
	A. ☐ Reviewed and Verified 60% Domestic Content; AND ☐ Reviewed and Verified Proposed U.S. Final Assembly, Location, Operations, and Total Cost OR B. ☐ Requested and Received Buy America Waiver
	Purchaser's Requirements Certification
	A. For Procurements of Rail Vehicles and More than 10 Buses or Modified Vans ³⁵ ☐ Completed Resident Inspector's Report; AND ☐ Completed Visual Inspections and Road Tests OR B. For Procurement of 10 or Fewer Buses or Modified Vans ³⁶ , and any Number of Unmodified Vans ☐ Completed Visual Inspection and Road Test
	FMVSS Certifications
	A. ☐ Verified FMVSS Sticker is Affixed to Each Bus OR B. ☐ Requested and Received Manufacturer's Letter Stating the That the Buses Are Not Subject to FMVSS.

B.3.2 Manufacturer at Post-Delivery Audit

Post-Delivery Audit (Before using the Rolling Stock in Transit Service)	Buy America Certification
	A. ☐ Prepared and provided to the recipient the Domestic Content Worksheet based on actual cost; AND ☐ Provide actual U.S. Final Assembly Total Cost OR B. ☐ Submitted a Buy America Waiver prior to award
	Purchaser's Requirements Certification
	C. ☐ Completed Visual Inspections and Road Tests and Provide reports to the Resident Inspector.
	FMVSS Certifications (Buses Only)
	C. ☐ Affixed FMVSS Stickers to Each Bus OR D. ☐ Provided letter stating that the Buses Are Not Subject to FMVSS.

³⁵ Except for procurements covered under paragraph 49 CFR § 663.37.(c).

³⁶ Except for procurements covered under paragraph 49 CFR § 663.37.(c).

B.3.3 Supplier at Post-Delivery Audit

Post-Delivery Audit (Before using the Rolling Stock in Transit Service)	Buy America Certification A. ☐ Prepared and provided to Rolling Stock Manufacturer the Component Supplier Buy America Certification including any updates from the Pre-Award Audit on the location of component manufacture and the percent domestic and foreign content of each subcomponent.
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B.3.4 Resident Inspector's Report for Post-Delivery Purchaser's Requirements Certification

For the Post-delivery Purchaser's Requirements Certification, the recipient shall review and retain the resident inspector's report of the recipient's oversight of the period of manufacture of the rolling stock being purchased. The following items would typically be included in the resident inspector's report documentation, as applicable.

Resident Inspector's Report Contents	Verified
1. Description of recipient's overall program to oversee manufacture of the rolling stock identifying all activities that verify compliance of product with contract and specifications including pilot car program, FAI, qualification testing, production inspection, production testing, acceptance testing and commissioning.	☐
2. Description of activities performed by recipient's resident inspection staff or designee at manufacturer's site(s) including pilot car inspection, qualification testing, first article inspections, source inspections, production in-process inspections, hold point inspections and final static and dynamic functional testing.	☐
3. Description of final assembly activities performed by manufacturer at U.S. final assembly site.	☐
4. Reference that vehicle history books were provided by the manufacturer to the recipient and reviewed prior to authorization for shipment briefly summarizing the contents of the vehicle history books and providing samples of critical documents such as final test results.	☐
5. Include sample authorization for shipment form for each vehicle showing place to record open items and resident inspector signature and date.	☐
6. Include sample documents demonstrating the manufacturer's implementation of their quality program; for example, a completed Nonconformance Report form should be included that identifies the deficiency and corrective action that was made. Any nonconforming material that was repaired (to other than full conformance with specification) or deemed usable as is must be approved/signed by the recipient/resident inspector.	☐
7. Reference that manufacturer maintained complete records of construction of each vehicle containing details beyond the scope of the resident inspector's report (such as the manufacturer's QA/QC inspections).	☐
8. Confirmation that delivered vehicles have been inspected and road tested to confirm that they meet contract requirements including a summary of static, dynamic and performance tests performed on each vehicle and a sample of key test report results showing sign-offs for completed tests, failed tests and any corrective action. Include sample documents.	☐
9. Confirmation that delivered vehicles have undergone testing and commissioning as necessary to be ready for entry into revenue service per the operating agency's procedures. Include sample documents.	☐
Reviewed and accepted by:	
Signature	Date
Title	

Appendix C *Certificates and Forms*

Certificate of Compliance with Buy America Rolling Stock Requirements

<u>CERTIFICATE OF COMPLIANCE WITH</u> <u>BUY AMERICA ROLLING STOCK REQUIREMENTS</u>	
The bidder or offeror hereby certifies that it will comply with the requirements of 49 U.S.C. 5323(j)(2)(C) and the applicable regulations of 49 CFR § 661.11.	
Date:	_____
Signature:	_____
Company:	_____
Print Name:	_____
Title:	_____

C.1 Certificate of Non-Compliance with Buy America Rolling Stock Requirements**CERTIFICATE OF NON-COMPLIANCE WITH****BUY AMERICA ROLLING STOCK REQUIREMENTS**

The bidder or offeror hereby certifies that it cannot comply with the requirements of 49 U.S.C. 5323(j), but may qualify for an exemption to the requirement pursuant to 49 U.S.C. 5323(j)(2)(A), 5323(j)(2)(B), or 5323(j)(2)(D), and the applicable regulations in 49 CFR § 661.7.

Date: _____

Authorized Signature: _____

Company: _____

Print Name: _____

Title: _____

C.2 Sample Pre-Award Buy America Compliance Certification**PRE-AWARD BUY AMERICA COMPLIANCE CERTIFICATION**

As required by Title 49 of the CFR, Part 663 – Subpart B, _____
(the recipient) is satisfied that the vehicles to be purchased,
_____ (number and description of
vehicles) from _____ (the manufacturer),
meet the requirements of 49 U.S.C. 5323(j), as amended. The recipient ☐, or its appointed
auditor ☐ _____ (the auditor – not the
manufacturer or its agent), has reviewed documentation provided by the manufacturer, which
lists (1) the proposed component and subcomponent parts of the vehicles identified by
manufacturer, country of origin, and cost; and (2) the proposed location of the final assembly
point for the vehicles, including a description of the activities that will take place at the final
assembly point and the cost of final assembly.

Date: _____

Recipient Authorized Signature: _____

Print Name: _____

Title: _____

C.3 Sample Pre-Award Buy America Exemption Certification

<u>PRE-AWARD BUY AMERICA EXEMPTION CERTIFICATION</u>
As required by Title 49 of the CFR, Part 663 – Subpart B, _____ (the recipient) certifies that there is a letter from FTA that grants a waiver to the vehicles to be purchased, _____ (number and description of vehicles), from the Buy America requirements under 49 U.S.C. 5323(j), as amended. Date: _____ Recipient Authorized Signature: _____ Print Name: _____ Title: _____

C.4 Sample Pre-Award Purchaser's Requirements Certification

<u>PRE-AWARD PURCHASER'S REQUIREMENTS CERTIFICATION</u>	
As required by Title 49 of the CFR, Part 663 – Subpart B, _____ (the recipient) certifies that the vehicles to be purchased, _____ (number and description of vehicles) from _____ (the manufacturer), are the same product described in the recipient's solicitation specification and that the proposed manufacturer is a responsible manufacturer with the capability to produce vehicles that meet the specifications. Date: _____ Recipient Authorized Signature: _____ Print Name: _____ Title: _____	

C.5 Sample Supplier Buy America Certification

Instructions for Completing the Buy America Supplier Certificate

Buy America Supplier Certificate should be filled out for any item for which domestic content is being claimed. The Buy America Supplier Certificate is the supplier's legal attestation of their domestic content and location of manufacturing for the products being provided for this procurement.

1. Fill in the supplier's contact information in the designated space at the top part of the form.
2. Fill in the contractor's name and contract/purchase order number that connects this certificate to the specific procurement project.
3. Identify which of the three calculation scenarios apply for each component by checking the respective box.
 - a) Check the first box if the component is manufactured in the U.S. and more than 60% of its subcomponents, by cost, are manufactured in the U.S.
 - b) Check the second box if the component is manufactured in the U.S. and 60% or less of its subcomponents, by cost, is manufactured in the U.S.
 - c) Check the third box if the component is NOT manufactured in the U.S. but does contain U.S. subcomponents for which the supplier has documentation showing tariff exemption.

The cost of U.S. subcomponents is calculated by dividing the cost of U.S. subcomponents by the cost of all subcomponents for each component; profit, markups, labor to produce the component and transportation are excluded from this calculation.

Use extra pages as needed to cover all components and subcomponents in the supplier's scope of provision.

4. List each component and its (major) subcomponents on the designated rows. Components should be identified by name and/or part number traceable to the subject procurement.
 - a) Indicate the manufacturing location for each component and subcomponent in the designated space;
 - b) Indicate the component's percentage of domestic subcomponents for each component in the designated space;
 - c) Indicate each subcomponent's percentage of the component's domestic content in the designated space; the sum of all the subcomponents' domestic content percentages will equal the domestic content percentage of the component.
5. The form must be signed and dated by an authorized official of the supplier. Print the name and title of the signatory beneath the signature line.

Information on this form is subject to audit by the Purchaser, i.e., recipient of federal funds, and/or by the Federal Transit Administration (and/or its agents).

<u>SAMPLE BUY AMERICA SUPPLIER CERTIFICATION</u>			
Supplier: _____			
Address: _____			
Phone: _____ Fax: _____			
Email: _____			
Contractor: _____			
Contract/Purchase Order: _____			
This certifies the Supplier's status of compliance with FTA Buy America Regulations set forth in 49 C.F.R § 661.11.			
For each component supplied for the Contract, the Supplier attests that (CHECK ONE BOX):			
☐	More than 60% of the subcomponents, by cost, are of U.S. origin/manufacture, and is manufactured in the U.S. The Supplier attests that the U.S. content of subcomponents, by cost, is as indicated below.		
☐	Less than 60% of the subcomponents, by cost, are of U.S. origin/manufacture, and is manufactured in the U.S. (in such case, the cost of U.S. subcomponents and cost of U.S. manufacturing labor are eligible for inclusion towards domestic content calculations). The Supplier attests that the U.S. content of subcomponents, by cost, is as indicated below.		
☐	The component contains subcomponents of domestic origin, however, the component is NOT manufactured in the U.S. (in such case, the cost of U.S. subcomponents and cost of U.S. manufacturing labor are eligible for inclusion towards domestic content calculations). The Supplier attests that the U.S. content of subcomponents, by cost, is as indicated below.		
	MANUFACTURING LOCATION	% DOMESTIC CONTENT	% FOREIGN CONTENT
[COMPONENT NAME]	<i>[Location of individual component]</i>	<i>[Total domestic content % of all subcomponents]</i>	<i>[Total content % of all subcomponents]</i>
[SUBCOMPONENT NAME] <i>(use rows for each subcomponent)</i>	<i>[Location of individual subcomponent]</i>	<i>[Total domestic content % of individual subcomponent]</i>	<i>[Total U.S. content % of all subcomponents]</i>
Attach additional sheets as needed			
Date: _____			
Supplier Authorized Signature: _____			
Print Name: _____			
Title: _____			

C.6 Sample Pre-Award FMVSS Compliance Certification

PRE-AWARD FMVSS COMPLIANCE CERTIFICATION

As required by Title 49 of the CFR, Part 663 – Subpart D, _____
_____(the recipient) certifies that it received, at the pre-award stage, a copy of
_____'s (the manufacturer) self-certification information
stating that the buses, _____
(number and description of buses), will comply with the relevant Federal Motor Vehicle Safety
Standards issued by the National Highway Traffic Safety Administration in Title 49 of the CFR,
Part 571.

Date: _____

Recipient Authorized Signature: _____

Print Name: _____

Title: _____

C.7 Sample Pre-Award Certification of FMVSS Inapplicability

<u>PRE-AWARD CERTIFICATION OF FMVSS INAPPLICABILITY</u>
As required by Title 49 of the CFR, Part 663 – Subpart D, _____ (the recipient) certifies that it received at the pre-award stage, a statement from _____ (the manufacturer) indicating that the _____ buses, _____ (number and description of vehicles), will not be subject to the Federal Motor Vehicle Safety Standards issued by the National Highway Traffic Safety Administration in Title 49 CFR, Part 571.
Date: _____
Recipient Authorized Signature: _____
Print Name: _____
Title: _____

C.8 Sample Post-Delivery Buy America Compliance Certification**POST-DELIVERY BUY AMERICA COMPLIANCE CERTIFICATION**

As required by Title 49 of the CFR, Part 663 – Subpart C,
_____ (the recipient) certifies that it is satisfied that
the _____ vehicles _____ received,
_____ (number and
description of vehicles) from _____ (the
manufacturer), meet the requirements of 49 U.S.C. 5323(j), as amended. The recipient ☐, or
its appointed auditor ☐ _____ (the auditor –
not the manufacturer or its agent), has reviewed documentation provided by the manufacturer,
which lists (1) the actual component and subcomponent parts of the vehicles identified by the
manufacturer, country of origin, and cost; and (2) the actual location of the final assembly point
for the vehicles, including a description of the activities that took place at the final assembly
point and the cost of final assembly.

Date: _____

Recipient Authorized Signature: _____

Print Name: _____

Title: _____

C.9 Sample Post-Delivery Buy America Exemption Certification

<u>POST-DELIVERY BUY AMERICA EXEMPTION CERTIFICATION</u>
As required by Title 49 of the CFR, Part 663 – Subpart C, _____ (the recipient) certifies that there is a letter from FTA, which grants a waiver to the vehicles received, _____ (manufacturer, number and description of vehicles) from the Buy America requirements under 49 U.S.C. 5323(j), as amended.
Date: _____
Recipient Authorized Signature: _____
Print Name: _____
Title: _____

***C.10 Sample Post-Delivery Purchaser's Requirements Certification
(More Than Ten Vehicles or Modified Vans³⁷)***

<u>POST-DELIVERY PURCHASER'S REQUIREMENTS CERTIFICATION</u>
As required by Title 49 of the CFR, Part 663 – Subpart C, _____ (the recipient) certifies that a resident inspector, _____ (the resident inspector – not an agent or employee of the manufacturer), was at _____'s (the manufacturer), manufacturing site during the period of manufacture of the vehicles, _____ (number and description of the vehicles). The inspector monitored manufacturing and completed a report on the manufacture of the vehicles providing accurate records of all vehicle construction activities. The report addresses how the construction and operation of the vehicles fulfill the contract specifications. After reviewing the report, visually inspecting the vehicles, and performance testing the vehicles, the recipient certifies that the vehicles meet the contract specifications. Date: _____ Recipient Authorized Signature: _____ Print Name: _____ Title: _____

³⁷Except for procurements covered under paragraph 49 CFR § 663.37.(c)

C.11 Sample Post-Delivery Purchaser's Requirements Certification (Ten or Fewer Vehicles or Modified Vans, or any Number of Unmodified Vans)

POST-DELIVERY PURCHASER'S REQUIREMENTS CERTIFICATION

As required by Title 49 of the CFR, Part 663 – Subpart C, after visually inspecting and road testing the contract vehicles, _____ (the recipient) certifies that the vehicles, _____ (number and description of vehicles) from _____ (the manufacturer), meet the contract specifications.

Date: _____

Recipient Authorized Signature: _____

Print Name: _____

Title: _____

C.12 Sample Post-Delivery FMVSS Compliance Certification

<u>POST-DELIVERY FMVSS COMPLIANCE CERTIFICATION</u>	
As required by Title 49 of the CFR, Part 663 – Subpart D,	
_____ (the recipient) certifies that it	
received, at the post-delivery stage, a copy of	
_____’s (the manufacturer) self-certification	
information stating that the buses,	
_____ (number and	
description of buses), comply with the relevant Federal Motor Vehicle Safety Standards issued by the National Highway Traffic Safety Administration in Title 49 CFR, Part 571.	
Date:	_____
Recipient Authorized Signature:	_____
Print Name:	_____
Title:	_____

C.13 Sample Post-Delivery Certification of FMVSS Inapplicability

<u>POST-DELIVERY CERTIFICATION OF FMVSS INAPPLICABILITY</u>
As required by Title 49 of the CFR, Part 663 – Subpart D, _____ _____ (the recipient) certifies that it received, at the post-delivery stage, a statement from _____'s (the manufacturer) indicating that the vehicles _____ (number and description of vehicles), are not subject to the Federal Motor Vehicle Safety Standards issued by the National Highway Traffic Safety Administration in Title 49 CFR, Part 571. Date: _____ Recipient Authorized Signature: _____ Print Name: _____ Title: _____

C.14 Sample Completed Vehicle FMVSS Sticker

MANUFACTURED BY (NAME)	
DATE: (MONTH/YEAR)	GVWR: (WEIGHT) LB
FRONT GAWR: (WEIGHT) LB WITH (SIZE) TIRES, (SIZE/TYPE) RIMS, AT PSI COLD (SINGLE/DUAL)	REAR GAWR: (WEIGHT) LB WITH (SIZE) TIRES, (SIZE/TYPE) RIMS, AT PSI COLD (SINGLE/DUAL)
THIS VEHICLE CONFORMS TO ALL APPLICABLE U.S. FEDERAL MOTOR VEHICLE SAFETY STANDARDS IN EFFECT ON THE DATE OF MANUFACTURE SHOWN ABOVE.	
VIN: (VEHICLE IDENTIFICATION NUMBER)	
TYPE: (VEHICLE TYPE)	

C.15 Sample Altered Vehicle Manufacturer's FMVSS Sticker

THIS VEHICLE WAS ALTERED BY (NAME) IN (MONTH/YEAR) AND AS ALTERED, IT CONFORMS TO ALL APPLICABLE FEDERAL MOTOR VEHICLE SAFETY STANDARDS AFFECTED BY THE ALTERATION AND IN EFFECT IN (MONTH/YEAR)	
GVWR: (WEIGHT) LB	
FRONT GAWR: (WEIGHT) LB WITH (SIZE) TIRES, (SIZE/TYPE) RIMS, AT PSI COLD (SINGLE/DUAL)	REAR GAWR: (WEIGHT) LB WITH (SIZE) TIRES, (SIZE/TYPE) RIMS, AT PSI COLD (SINGLE/DUAL)
TYPE: (VEHICLE TYPE)	

C.16 Sample Incomplete Vehicle Manufacturer's FMVSS Sticker

THIS CHASSIS-CAB CONFORMS TO FEDERAL MOTOR VEHICLE SAFETY STANDARD NOS. (APPLICABLE FMVSS NUMBERS). THIS VEHICLE WILL CONFORM TO STANDARD NOS. (APPLICABLE FMVSS NUMBERS) IF IT IS COMPLETED IN ACCORDANCE WITH THE INSTRUCTIONS CONTAINED IN THE INCOMPLETE VEHICLE DOCUMENT FURNISHED PURSUANT TO 49 CFR PART 568. CONFORMITY TO THE OTHER SAFETY STANDARDS APPLICABLE TO THIS VEHICLE WHEN COMPLETED IS NOT SUBSTANTIALLY AFFECTED BY THE DESIGN OF THE CHASSIS-CAB.

**CHASSIS-CAB MANUFACTURED BY (NAME).
(MONTH/YEAR)**

C.17 Sample Intermediate Vehicle Manufacturer's FMVSS Sticker

WITH RESPECT TO STANDARD NOS. (APPLICABLE FMVSS NUMBERS), THE INSTRUCTIONS OF PRIOR MANUFACTURERS HAVE BEEN FOLLOWED SO THAT THE CHASSIS-CAB NOW CONFORMS TO THESE STANDARDS. THIS CHASSIS-CAB CONFORMS TO FEDERAL MOTOR VEHICLE SAFETY STANDARD NOS. (APPLICABLE FMVSS NUMBERS). WILL CONFORM TO STANDARD NOS. (APPLICABLE FMVSS NUMBERS) IF IT IS COMPLETED IN ACCORDANCE WITH THE INSTRUCTIONS CONTAINED IN THE AMENDED INCOMPLETE VEHICLE DOCUMENT FURNISHED PURSUANT TO 49 CFR PART 568. CONFORMITY TO STANDARD NOS. (APPLICABLE FMVSS NUMBERS) IS NO LONGER SUBSTANTIALLY AFFECTED BY THE DESIGN OF THIS CHASSIS-CAB.

**INTERMEDIATE MANUFACTURE BY (NAME).
(MONTH/YEAR)**

C.18 Samples of Final-Stage Vehicle Manufacturer's FMVSS Stickers

MANUFACTURED BY (NAME). DATE: (MONTH/YEAR) INCOMPLETE VEHICLE MANUFACTURED BY (NAME). DATE: (MONTH/YEAR)	
GVWR: (WEIGHT) LB	
FRONT GAWR: (WEIGHT) LB WITH (SIZE) TIRES, (SIZE/TYPE) RIMS, AT PSI COLD (SINGLE/DUAL)	REAR GAWR: (WEIGHT) LB WITH (SIZE) TIRES, (SIZE/TYPE) RIMS, AT PSI COLD (SINGLE/DUAL)
CONFORMITY OF THE CHASSIS-CAB TO FEDERAL MOTOR VEHICLE SAFETY STANDARDS, WHICH HAVE BEEN PREVIOUSLY FULLY CERTIFIED BY THE INCOMPLETE VEHICLE MANUFACTURER OR INTERMEDIATE VEHICLE MANUFACTURER, HAS NOT BEEN AFFECTED BY FINAL-STAGE MANUFACTURE, THE VEHICLE HAS BEEN COMPLETED IN ACCORDANCE WITH THE PRIOR MANUFACTURER'S INSTRUCTIONS, WHERE APPLICABLE. THIS VEHICLE CONFORMS TO ALL OTHER APPLICABLE FEDERAL MOTOR VEHICLE SAFETY STANDARDS IN EFFECT IN (MONTH/YEAR). VIN: (VEHICLE IDENTIFICATION NUMBER) TYPE: (VEHICLE TYPE)	

OR

CONFORMITY OF THE CHASSIS-CAB TO FEDERAL MOTOR VEHICLE SAFETY STANDARD NOS. (APPLICABLE FMVSS NUMBERS) HAS NOT BEEN AFFECTED BY FINAL-STAGE MANUFACTURE. WITH RESPECT TO THE STANDARD NOS. (APPLICABLE FMVSS NUMBERS), THE VEHICLE HAS BEEN COMPLETED IN ACCORDANCE WITH THE PRIOR MANUFACTURER'S INSTRUCTIONS. THIS VEHICLE CONFORMS TO ALL OTHER APPLICABLE FEDERAL MOTOR VEHICLE SAFETY STANDARDS IN EFFECT IN (MONTH/YEAR). VIN: (VEHICLE IDENTIFICATION NUMBER) TYPE: (VEHICLE TYPE)

OR

**THIS VEHICLE CONFORMS TO ALL OTHER APPLICABLE
FEDERAL MOTOR VEHICLE SAFETY STANDARDS IN
EFFECT IN (MONTH/YEAR).**

VIN: (VEHICLE IDENTIFICATION NUMBER)

TYPE: (VEHICLE TYPE)

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Appendix D Sample Buy America Audit Reports

D.1 Pre-Award Audit Reports

ABC TRANSIT AGENCY

ROLLING STOCK VEHICLE PROCUREMENT

Pre-Award Audit Report

Submitted By:

[Recipient and/or Consultant Information]

[Date]

A B C TRANSIT AGENCY

**Pre-Award Compliance Certifications for
[Rolling Stock Manufacturer]**

PRE-AWARD BUY AMERICA COMPLIANCE CERTIFICATION

As required by Title 49 of the CFR, Part 663 – Subpart B, ABC Transit Agency (the recipient) certifies that it is satisfied that the rail vehicles or buses to be purchased, _____ (number and description of rolling stock vehicles) from [Rolling Stock Manufacturer] (the manufacturer), meet the requirements of 49 U.S.C. 5323(m). The recipient, or its appointed auditor, [Auditor Name – not the manufacturer or its agent], has reviewed documentation provided by the manufacturer, which lists (1) the proposed component and sub-component parts of the rolling stock, identified by manufacturer, country of origin, and cost; and (2) the proposed location of the final assembly point for the rolling stock vehicles, including a description of the activities that will take place at the final assembly point and the cost of final assembly.

Name: _____

Date: _____

Signature: _____

Title: _____

PRE-AWARD PURCHASER'S REQUIREMENTS CERTIFICATION

As required by Title 49 of the CFR, Part 663 – Subpart B, ABC Transit Agency (the recipient) certifies that it is satisfied that the rolling stock to be purchased, _____ (number and description of rolling stock vehicles) from [Rolling Stock Manufacturer] (the manufacturer), are the same product described in the recipient's solicitation specification and that the proposed manufacturer is a responsible manufacturer with the capability to produce a rolling stock vehicle that meets the specifications.

Name: _____

Date: _____

Signature: _____

Title: _____

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5.0 FEDERAL MOTOR VEHICLE SAFETY STANDARDS (FMVSS CERTIFICATION) (FOR BUSES ONLY)

6.0 PRE-AWARD AUDIT CONCLUSIONS

APPENDICES

Appendix 1 Federal Regulations 49 CFR Part 661 – Buy America Requirements, and Federal Regulations 49 CFR Part 663 - Pre-Award and Post-Delivery Audits of Rolling Stock Purchases pertinent

Appendix 2 Rolling Stock Projected Buy America Worksheet and Evaluation of Component and Subcomponent Costs for reasonableness

Appendix 3 Analysis of final assembly cost for reasonableness

Appendix 4 Summary comparison of the Manufacturer's Proposal to the RFP Requirements

Appendix 5 Pre-Award Site Visit Report

Appendix 6 Excerpts and Table of Contents of Manufacturer's Quality Assurance and Control Plan

Appendix 7 Sample FMVSS Certification, if applicable

1.0 EXECUTIVE SUMMARY

Provide description of report including manufacture, number, and type of vehicles and references to key FTA guidelines.

Provide statement about whether rolling stock vehicle manufacture is compliant with both (or all three) certifications reference Appendix 1.

Provide description how report is divided into two (or three) major sections in accordance with the regulation's requirements namely:

- i) Pre-Award Buy America Compliance Certification,
- ii) Pre-Award Purchaser's Requirements Certification, and
- iii) Pre-Award FMVSS Certification, if applicable).

Include statement about the appendices of this report containing the relevant attachments to support the two (or three) major sections.

Provide statement about if Rolling Stock vehicle manufacture meets requirements and any issues that can be improved upon in the future with the manufacture.

2.0 PRE-AWARD AUDIT PROCEDURES

Provide brief description of the procedures used to perform overall audit including if in-house staff or consultants were used. Include brief statement about Pre-Award Buy America documentation received from the rolling stock vehicle manufacture and provide brief overview of the review and analysis performed to determine compliance with Buy America Requirements including any onsite visits to the rolling stock manufacture or component supplier sites. Include brief statement about procedures used to determine Pre-Award Purchaser's Requirements Certification including documentation reviewed and site visits performed as necessary to determine if the proposal meets the solicitation requirements and that the rolling stock manufacture is responsible with the capability and capacity to produce the vehicle in compliance with the Contract Requirements.

3.0 PRE-AWARD BUY AMERICA COMPLIANCE CERTIFICATION

Provide brief summary that this section addresses the rolling stock vehicle manufacturer's Pre-Award Buy America documentation on how they meet or do not meet the 60% domestic content and final assembly requirements. Provide brief summary of documentation provided by the rolling stock vehicle manufacture and reviewed by the recipient or its designated auditor and indicate what is provided in the following sections.

3.1 Verification of Sixty (60) Percent Domestic Content and Final Assembly Cost

Provide brief summary about auditor reviewing rolling stock vehicle manufacturer's Buy America worksheet (Appendix 2) and if it includes all the typical components of the rolling stock being purchased per the 49 CFR § 661.11. State the total % domestic content predicted by the rolling stock vehicle manufacture.

Provide more detailed summary regarding the Buy America worksheet indicating if it includes the breakdown of components, subcomponents, manufacture of origin, percent cost or actual cost of components and percent cost or actual cost of corresponding subcomponents. Provide brief summary about the formulas and calculations used to determine domestic content and if accurate. Provide any other unique details about the manufacturer's Buy America worksheet for example if a few components make up the majority of cost for > 60% domestic content and among those components if a few major subcomponents are the largest cost or if cost and risk are more evenly distributed, etc.

Provide brief summary about whether manufacture has signed certificates from all component suppliers (Appendix 3) and statement about the sampling of the major components supplier's certifications (Appendix 4) and the content of the certifications being consistent with the sample component supplier's certification in the Pre-Award and Post-Delivery Audit Handbook.

Provide brief summary about cost reasonableness of components and final assembly cost and brief summary on analysis used or experience that informs to determine cost reasonableness. Include any back up analysis of the manufacturer's Buy America worksheet in the Appendices section of report and briefly summarize the analysis performed (Appendix 5).

Provide summary statement affirming the manufacturer's claimed domestic content based on the independent analysis. Provide final statement about whether the Rolling Stock Manufacturer's Buy America Worksheet is reliable or not.

3.2 Verification of US Final Assembly Location and Activities

Provide brief summary of rolling stock vehicle manufacturer's US final assembly location and how the rolling stock vehicle manufacturer's final assembly activities correspond to minimum final assembly activities in the 49 CFR § 661.11 C or D. This may be achieved by including a comparison worksheet.

4.0 PRE-AWARD PURCHASER'S REQUIREMENTS CERTIFICATION

Provide summary that this section addresses the manufacturer's Pre-Award Purchaser's Requirements Certification. Provide brief summary on methods of review and analysis to determine if the requirements were satisfied including presence of resident inspector, resident inspectors report and verification and results of visual inspection and test sheets.

Provide summary statement on if the Rolling Stock Vehicle Manufacture meets the Pre-Award Purchaser's Requirements as stated in 49 CFR Part 663 Pre-Award and Post-Delivery Audits of Rolling Stock Purchases.

4.1 Verification of the Product as Described in the Specification

Provide brief summary on how *ABC Transit Agency's* Evaluation Team reviewed the Manufacturer's Bid (Proposal) and compared it to the solicitation specifications and after reviewing the manufacturer's bid, issuing addendums and receiving responses to clarifications, the Manufacture was found to be compliant.

4.2 Verification Manufacturer is Responsible with Capability and Capacity to Deliver the Product

Provide summary on how manufacturer is responsible include for example list of past deliveries of similar order over past 5 years and indicate if it will use same or similar process and same final assembly facility. Provide summary of rolling stock vehicle manufacturer's Quality Assurance and Control plan and indicate if it includes the appropriate elements of quality as described in FTA's Quality Management Systems Guidelines FTA PA 27 5194 12.1³⁸. The table of Contents of the Manufacturer's Quality Assurance Plan is provided in Appendix 6.

Provide brief summary of rolling stock manufacturer's capacity including summary of findings from Pre-Award or past site visit such as square footage final assembly facility, final assembly activities, estimated number of final assembly production workers, current jobs in production and of similar type vehicle, types of departments/divisions at final assembly (e.g., engineering, production line, testing, shipping and receiving, etc.), observance of tooling and machining equipment, jib and overhead bridge cranes, observance of welding, quality control. If Pre-Award Site visit was not conducted due to no final assembly site, provide similar summary based on capability and capacity documentation received from rolling stock manufacture.

Provide summary statement based on review if rolling stock manufacture has capacity and capability to produce the rolling stock to meet the contract requirements.

³⁸ This is located on the FTA "Project Management Oversight" webpage.

5.0 FEDERAL MOTOR VEHICLE SAFETY STANDARDS (FMVSS CERTIFICATION) (IF APPLICABLE)

Provide summary statement that a sample of the Manufacturer's FMVSS self-certification sticker information was obtained and reviewed against sample FMVSS sticker and was found to include the content required for the Pre-Award Audit. (Ref. Appendix 7).

6.0 PRE-AWARD AUDIT CONCLUSION

Provide summary regarding how the procedures used, analysis performed and results found on Pre-Award Audit of the rolling stock manufacture indicate that they should meet Buy America Compliance and the Purchaser's requirements certification.

D.2 Post-Delivery Audit Reports

ABC TRANSIT AGENCY

ROLLING STOCK VEHICLE PROCUREMENT

Post-Delivery Audit Report

Submitted By:

[Recipient and/or Consultant Information]

[Date]

A B C TRANSIT AGENCY NAME HERE

**Post-Delivery Buy America Compliance Certification for
(Rolling Stock Manufacture Name Here)**

POST- DELIVERY BUY AMERICA COMPLIANCE CERTIFICATION

As required by Title 49 of the CFR, Part 663 – Subpart C, _____ (the grantee) certifies that it is satisfied that the rolling stock vehicles received, _____ (number and description of rolling stock vehicles) from _____ (the manufacturer), meet the requirements of 49 U.S.C. 5323(m). The grantee ☐, or its appointed auditor ☐ _____ (the auditor – not the manufacturer or its agent), has reviewed documentation provided by the manufacturer, which lists (1) the actual component and subcomponent parts of the rolling stock vehicles identified by manufacturer, country of origin, and cost; and (2) the actual location of the final assembly point for rolling stock vehicles, including a description of the activities that took place at the final assembly point and the cost of final assembly.

Name: _____

Date: _____

Signature: _____

Title: _____

**Post-Delivery Purchaser's Requirements Certification for
(Rolling Stock Manufacture Name Here)**

POST-DELIVERY PURCHASER'S REQUIREMENTS CERTIFICATION

As required by Title 49 of the CFR, Part 663 – Subpart C, _____ (the grantee) certifies that a resident inspector, _____ (the resident inspector – not an agent or employee of the manufacturer), was at _____ (the manufacturer), manufacturing site during the period of manufacture of the rolling stock, _____ (number and description of the rolling stock). The inspector monitored manufacturing and completed a report on the manufacture of the rolling stock providing accurate records of all vehicle construction activities. The report addresses how the construction and operation of the rolling stock fulfill the contract specifications. After reviewing the report, visually inspecting the rolling stock, and performance testing the rolling stock, the grantee certifies that the rolling stock meets the contract specifications.

Name: _____

Date: _____

Signature: _____

Title: _____

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Appendix 4 Component Supplier Post-Delivery Buy America Certification Log and Sampling of key Component Post-Delivery Buy America Certifications

Appendix 5 Auditor's reviews, analysis, back-up documentation and statements regarding cost reasonableness

Appendix 6 Resident Inspector's Post-Delivery Purchaser's Requirements Report

Appendix 7 Excerpts or Table of Contents of Rolling Stock Manufacturer's Quality Assurance/Quality Control Report

Appendix 8 Sample Inspection and Test Reports

1.0 EXECUTIVE SUMMARY

Provide description of report including manufacture, number, and type of vehicles and references to key FTA guidelines.

Provide statement about whether rolling stock vehicle manufacturer is compliant with both (or all three) certifications reference Appendix 1.

Provide description how report is divided into two (or three) major sections in accordance with the regulation's requirements namely:

- i) Post-Delivery Buy America Compliance Certification
- ii) Post-Delivery Purchaser's Requirements Certification
- iii) Post-Delivery FMVSS Certification (if applicable)

Include statement about the appendices of this report containing the relevant attachments to support the two (or three) major sections.

Provide statement about if Rolling Stock vehicle manufacturer meets requirements and any issues that can be improved upon in the future with the manufacturer.

2.0 POST-DELIVERY AUDIT PROCEDURES

Provide brief description of the procedures used to perform overall audit including if in-house staff or consultants were used. Include brief statement about Post-Delivery Buy America documentation received from the rolling stock vehicle manufacturer and provide brief overview of the review and analysis performed to determine compliance with Buy America Requirements including any onsite visits to the rolling stock manufacturer or component supplier sites. Include brief statement about procedures used to determine Post-Delivery Purchaser's Requirements Certification including the presence of a resident inspector and confirmation of receipt and review of resident inspectors report to determine compliance with Post-Delivery Purchaser's Requirements Certification.

3.0 POST-DELIVERY BUY AMERICA COMPLIANCE CERTIFICATION

Provide brief summary that this section addresses the rolling stock vehicle manufacturer's Post-Delivery Buy America documentation on how they meet or do not meet the 60% domestic content and final assembly requirements. Provide brief summary of documentation provided by the rolling stock vehicle manufacturer and reviewed by the recipient or its designated auditor and indicate what is provided in the following sections.

3.1 Verification of Sixty (60%) Domestic Content and Final Assembly cost

Provide brief summary about auditor reviewing rolling stock vehicle manufacturer's Buy America worksheet (Appendix 2) and if it includes all the typical components of the rolling stock being purchased per the 49 CFR § 661.11. Address if any significant changes downward in US domestic content overall or for a particular component in comparison to the Pre-Award Audit Report. State the total % domestic content claimed by the rolling stock vehicle manufacturer.

Provide more detailed summary regarding the Buy America worksheet indicating if it includes the breakdown of components, subcomponents, manufacture of origin, percent cost or actual cost of components and percent cost or actual cost of corresponding subcomponents. Provide brief summary about the formulas and calculations used to determine domestic content and if accurate. Provide any other unique details about the manufacturers Buy America worksheet for example if a few components make up the majority of cost and 60% domestic content and among those components a few major subcomponents are the largest cost or if cost and risk and are more evenly distributed, etc. Provide summary about auditor's review of the bill of material if be required to verify components. Provide summary about auditor's review of purchase orders of major or all components and if found that costs were traceable to the rolling stock manufacturer's Buy America domestic content worksheet.

Provide brief summary about whether manufacturer has signed certificates from all component suppliers (Appendix 3) and statement about the sampling of the major components supplier's certifications (Appendix 4) and the content of the certifications being consistent with the sample component supplier's certification in the Pre-Award and Post-Delivery Audit Handbook.

Provide brief summary about cost reasonableness of components and final assembly cost and brief summary on analysis used or experience that informs to determine cost reasonableness. Include any back up analysis of manufacturer's Buy America worksheet in the Appendices section of report and briefly summarize the analysis performed (Appendix 5).

Provide summary statement affirming manufacturer's claimed domestic content based on the independent analysis. Provide final statement about whether the Rolling Stock Manufacturer's Buy America Worksheet is accurate and documented.

3.2 Verification of U.S. Final Assembly Location and Activities

Provide brief summary confirming U.S. final assembly location and how final assembly activities correspond to minimum final assembly activities in 49 CFR § 661.11 Appendix D. Make reference to the Resident Inspector's report that should detail this information (Appendix 6).

4.0 POST-DELIVERY PURCHASER'S REQUIREMENTS CERTIFICATION

Provide summary that this section addresses the manufacturers Post-Delivery Purchaser's Requirements Certification. Provide brief summary on methods of review and analysis to determine if the requirements were satisfied including presence of resident inspector, resident inspectors report and verification and results of visual inspection and test sheets.

Provide summary statement on if the Rolling Stock Vehicle Manufacturer meets the Post-Delivery Purchaser's Requirements as stated in 49 CFR Part 663 Pre-Award and Post-Delivery Audits of Rolling Stock Purchases.

4.1 Assignment of Resident Inspector to Final Assembly Location Verification of Manufacturer's Capability and Capacity

Provide brief summary of Resident Inspector's report and how it demonstrates Rolling Stock Manufacturer's Capability and Capacity. Include statements such if full time or part time for resident inspector and number of resident inspectors at final assembly plant and type of inspections performed on vehicles as summarized in the resident inspector's report (Appendix 6). Provide summary of quality assurance and control processes and if they comply with the appropriate FTA elements (Appendix 7).

4.2 Inspection Testing and Commissioning to Show Vehicles Fulfill Contract Specifications

Provide brief summary of key inspection, testing, test witnessing and commissioning activities as summarized in the resident inspector's report making reference to sample inspection check sheets, testing procedures and reports and examples of how the results inspection and testing meet the technical specification requirements (Appendix 8).

5.0 FEDERAL MOTOR VEHICLE SAFETY STANDARDS (FMVSS CERTIFICATION) (IF APPLICABLE)

Provide summary statement that the rolling stock vehicle manufacturer's actual FMVSS self-certification sticker information was obtained and reviewed against sample FMVSS sticker and was found to include the content required for the Post-Delivery Audit. (Ref. Appendix 7).

6.0 POST-DELIVERY AUDIT CONCLUSION

Provide summary regarding how the procedures used, analysis performed and results found on Post-Delivery Audit of the rolling stock manufacturer indicate that the Buy America Compliance and the Purchaser's requirements certification have been satisfied.

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