



August 7, 2025

To Whom It May Concern:

Re: **EBTRON** products' domestic content, Buy American Act (BAA), ARRA, Build America, Buy America Act (BABAA) and Trade Agreements Act (TAA) compliance.

**EBTRON Inc.** certifies that the products listed below are totally designed, assembled and tested in the United States and that they satisfy the definition of "domestic manufactured construction material" under the American Recovery and Reinvestment Act of 2009 (Pub. L. 111-5); including Title XVI, §1605, whose compliance is also satisfied by meeting the definition of "Produced in the United States" as referenced in 2 CFR 176.140, 176.160, and "domestic construction materials under FAR 52.225-11 (Nov 2023)" ARRA Buy American compliance. Furthermore, our products meet the requirements of the Trade Agreements Act (19 U.S.C. §§2501-2581) and are suitable for government procurement.

Because all of the products that **EBTRON, Inc.** supplies to the U.S. government are sold in substantial commercial quantities and are unmodified for sale to U.S. government agencies, **EBTRON** may also claim the COTS exception to the "component test" under 41 USC 431. All products manufactured by **EBTRON, Inc.** in Loris, SC, USA therefore qualify as "domestic end product" under §25.101 and §25.200 of the Buy American Act. 2009 (BAA) 41 USC 10. These products and/or materials shipped/provided are also in full compliance with the Build America, Buy America Act (BABAA) requirements as mandated in the Infrastructure Investment and Jobs Act (IIJA) Pub. L. No. 117-58, §§ 70901-52.

However, if required to satisfy the 'component test,' the models below have domestic content exceeding the required percentage of the total cost for all components. The average domestic portion of the total value of each product varies with size and model, but typically exceeds this minimum majority requirement.

**Applicable Products:**

- GTx116e-P, -PC, -P+, -B
- GTx108e-F, -F/An,
- HTx104 -P, -PE, -F, -U, -B, -T
- EF-x2000-T, U, B
- EF-x1000-T ELF & variations
- SERVAIRE- E100
- CENSus-C100
- IAQ-Ny00-W
- BRG-N100
- ALRT-100

**Notes:**

- Current ('x' represents 'A', 'B', 'C', 'M', 'F' or 'U')
- Current ('x' represents 'A', 'B', 'C', 'M', 'F' or 'U')
- Current ('x' represents 'A', 'N')
- Current ('x' represents 'A', 'N')
- Current ('x' represents 'A', 'N')
- Current
- Limited Availability
- Current
- Current
- Current

Sincerely,

Rick Rivers  
Regulatory Manager