

January 01, 2025

To Whom It May Concern,

Advanced Architectural Product (A2P) meets the requirements of the Build America, Buy America Act (BABA, as defined below) for iron or steel products, construction materials, and manufactured products. A2P is a manufacturer and produces all its products in the United States (domestically), with its corporate offices based in Allegan, MI, and manufacturing plant in Hamilton, MI.

### **BABA Definitions of Covered Products or Materials**

Under BABA, the new guidance makes clear that "[a]n article, material, or supply should only be classified into one of the following categories: (1) iron or steel products; (2) manufactured products; (3) construction materials; or (4) section 70917(c) materials."

- **Iron or Steel Products** means "articles, materials, or supplies that consist wholly or predominantly of iron or steel or a combination of both."
- **Construction Materials** means articles, materials, or supplies that consist of only one of the following: (i) non-ferrous metals; (ii) plastic and polymer-based products (including polyvinylchloride, composite building materials, and polymers used in fiber optic cables); (iii) glass (including optic glass); (iv) fiber optic cable (including drop cable); (v) optical fiber; (vi) lumber; (vii) engineered wood; and (viii) drywall. The definition also notes that "minor additions of articles, materials, supplies, or binding agents to a construction material do not change the categorization of the construction material."
- **Manufactured Products** means "articles, materials, or supplies that have been: (i) processed into a specific form and shape; or (ii) combined with other articles, materials, or supplies to create a product with different properties than the individual articles, materials, or supplies." Importantly, the definition also allows a Manufactured Product to include components that are Construction Materials, Iron or Steel Products, or Section 70917(c) materials.

### **Determination of the Cost of Components of Manufactured Products**

For Manufactured Products under BABA to qualify as "produced in the United States," the end product must be manufactured in the United States, and more than 55% of the total cost of all components of the manufactured product must also be of U.S. origin.

Sincerely,

Juan Mendez  
Controller  
Advanced Architectural Products