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May 30, 2017

Re: Overly Door Compliance with Buy American Act Requirements

To Whom It May Concern:

Overly Door Company (“**Overly Door**”) is headquartered in Greensburg, PA. The components for several of Overly Door’s products are currently manufactured in a plant in Greensburg and products are then shipped to a plant in Reynosa, Mexico for assembly.

All parts used in the construction of our doors are manufactured by suppliers in the United States or produced at our manufacturing location in Greensburg. Our assembly facility in Reynosa, Mexico was constructed and is managed under terms set forth by the North American Free Trade Agreement (“**NAFTA**”).

The Buy American Act, as supplemented by the American Recovery and Reinvestment Act (“**ARRA**”) and subsequent Federal Acquisition Regulations (“**FAR**”), contains certain restrictions regarding the use of federal funds in the procurement of iron, steel and manufactured goods in projects for the construction, alteration, maintenance, or repair of a public building or other public work in the United States. However, ARRA specifically provides that these restrictions must be “applied in a manner consistent with United States obligations under international agreements.” *See* ARRA section 1605(d). This clearly includes NAFTA, the international agreement under which Overly Door’s Reynosa facility continues to operate. Additionally, FAR section 52.225-23(b)(1) explicitly provides that the “restrictions of section 1605 of (ARRA) and (the Buy America Act) do not apply to Recovery Act designated country construction materials”. FAR section 52.225-23(a) specifically defines those countries deemed to be “Recovery Act designated countries” and this list includes Mexico.

Any suggestion that the doors supplied by Overly Door do not comply with these requirements misconstrues both the plain language of FAR section 52.225-23 and the intent behind Congress’s mandate in ARRA that any restrictions be read so as not to violate international agreements.

We hope that you will find the foregoing analysis helpful. Please do not hesitate to contact us if further information is necessary.

Timothy T. Reese  
President/CEO  
Overly Door Co.