

Colin Thirlaway
Director Global Product Compliance
Stanley Black & Decker

October 1st 2014

Dear Sir

Ref: Compliance with DFARS Requirements for Specialty Metal Fasteners

On January 29, 2008, the Office of The Undersecretary of Defense issued Class Deviation 2008-O0002, explaining the recent revisions to 10 U.S.C. § 2533b related to Specialty Metal Content for Commercially Available Off the Shelf (COTS) items, including fasteners.

The deviation provides that COTS fasteners are exempt from having to comply with the specialty metal content requirements of § 2533b, if the fastener is incorporated into another COTS higher level item.

Emhart's standard fastener product lines are sold as Commercially Available off the Shelf items going into a higher level COTS item.

If the COTS fastener is incorporated into a non COTS item, the fastener is exempt if the fastener manufacturer certifies that, based on a good faith estimate, at least 50% of the specialty metal purchased to produce such fasteners for all its customers is from a United States or qualifying country melt source.

Emhart certifies its standard fastener product lines meet the good faith estimate requirement.

Fasteners designed for custom applications and considered to be a non COTS item, are subject to the normal requirement that 100% of the specialty metal content be melted or produced in the United States or a qualifying country of origin.

In the event a specialty fastener needs to be developed and requires DFARS compliance, the customer will have to state this requirement on their request for quote.

Should you need any further detail please do not hesitate to give me a call.

Yours sincerely



Colin Thirlaway
Director Global Product Compliance
Stanley Black & Decker

Office 00 44 1388 422201
Email colin.thirlaway@sbdinc.com