



Question for Determining Whether Substantial Transformation Has Occurred in the US

Question	Yes	No
1. Were all of the components of the manufactured good manufactured in the United States, and were all of the components assembled into the final product in the US? (If the answer is yes, then this is clearly manufactured in the US, and the inquiry is completed)		✓
2. Was there a change in character or use of the good or the components in America? (These questions apply to the product as a whole, not to individual components) <i>(Questions 2.a, 2.b. and 2.c shown on next slide)</i>	✓	
3. Was(/were) the process(es) performed in the US (including but not limited to assembly) complex and meaningful? <i>(Questions 3.a., 3.b.,3.c., 3.d, and 3.e. shown on later slide)</i>	✓	



For: Cla-Val Pilot Operated Control Valve Assemblies & Hytrol Valves

To Answer Question 2, Ask the Following:

Question	Yes	No
2. Was there a change in character or use of the good or the components in America? (These questions apply to the product as a whole, not to individual components)	✓	
a. Was there a change in the physical and/or chemical properties or characteristics designed to alter the functionality of the good?	✓	
b. Did the manufacturing or processing operation result in a change of a product(s) with one use into a product with a different use?	✓	
c. Did the manufacturing or processing operation result in the narrowing of the range of possible uses of a multi-use product?	✓	





To Answer Questions 3, Ask the Following:

Question	Yes	No
3. Was (/were) the process(es) performed in the US (including but not limited to assembly) complex and meaningful?	✓	
a. Did the process(es) take a substantial amount of time?	✓	
b. Was(/were) the process(es) costly?	✓	
c. Did the process(es) require particular high level skills?	✓	
d. Did the process(es) require a number of different operations?	✓	
e. Was substantial value added in the process(es)?	✓	



For: Cla-Val Pilot Operated Control Valve Assemblies & Hytrol Valves

How to Apply the Substantial Transformation Questions

Substantial Transformation has occurred in the US if answer yes to either Question 1, 2, or 3

- If answer to any of 2a, 2b, or 2c is yes, than answer to Question 2 is yes
- If answer to at least two of 3a, 3b, 3c, 3d, or 3e is yes, then answer to Question 3 is yes

