



Terra-Vaults, Inc.

1304 Corporate Drive
Gainesville, TX 76240
Website: www.terra-vaults.com

Date: 26 January 2026

Subject: BABA Compliance Assurance for Polymer-Concrete and FRP Enclosures

To Whom It May Concern,

Terra-Vaults, Inc. (“Manufacturer”) hereby certifies that the products listed below comply with the Build America, Buy America (BABA) requirements under the Infrastructure Investment and Jobs Act (IIJA), Pub. L. 117-58, including 2 CFR Part 184 and 23 CFR §635.410, as applicable to Federally funded infrastructure projects, including the National Electric Vehicle Infrastructure (NEVI) Program administered by the Federal Highway Administration (FHWA).

1. Covered Products

This certification applies to the following Terra-Vaults products:

- PB-FIBER VAULT
- PB-5
- PB-6
- Polymer-Concrete Ground Access Enclosures, Vaults, Pads, Risers, and Related Components

2. Classification Under BABA

Terra-Vault’s polymer-concrete enclosures are classified as **construction products**. Under 2 CFR 184 and applicable Federal guidance, construction products must be:

1. **Manufactured in the United States**, and
2. Must have the **cost of all components mined, produced, or manufactured in the United States** greater than 55% of total component cost, unless superseded by a stricter product-specific standard.



3. Domestic Content Requirement (>55%)

Terra-Vaults confirms that:

- All polymer-concrete enclosure products are **manufactured in the United States** at our U.S. production facilities.
- The **major raw materials**, including aggregates, polymer-resins, catalysts, fillers, reinforcing materials, and hardware are **sourced from U.S. suppliers**, constituting more than **55% domestic component cost**, satisfying BABA component cost requirements for construction products.

4. Traceability & Documentation

Upon request, Terra-Vaults can provide traceable documentation including:

- Bills of material (BOM)
- Supplier certifications
- Resin & aggregate sourcing documentation
- Production records
- Country-of-origin attestations
- Tier & load-bearing test certifications

5. Engineering & Performance Standards

Where applicable, Terra-Vaults polymer-concrete enclosures meet or exceed relevant performance and industry specifications, including but not limited to:

- **SCTE-77 Tier Load Ratings**
- **ASTM material and test standards**

State-level conformance to **DOT, utility, and telecommunications** performance requirements is handled through independent approval and testing.



6. No Foreign Manufacturing

All covered Products are manufactured and finally assembled in the United States. All major manufacturing processes, including molding, casting, finishing, and final product assembly, occur at Terra-Vaults' U.S.-based production facilities.

Terra-Vaults does **not** manufacture polymer-concrete enclosure products outside the United States and does **not** rely on foreign-origin production processes which would disqualify BABA compliance for construction products.

7. Product Consistency

The Products identified in this certification have not undergone any material changes that affect BABA compliance.

8. Authorized Certification

Based on the above, Terra-Vaults certifies that its polymer-concrete enclosure products are **BABA-compliant construction products eligible for use on federally** funded infrastructure projects requiring Build America, Buy America compliance.

This certification is valid for twelve (12) months from the date above.

If you require additional documentation, material breakdowns, product specifications, or agency submission formats, please contact our compliance team.

Sincerely,

Dennis W. Koerner

Dennis W. Koerner

Authorized Member

Terra-Vaults, Inc.

dennis@terra-vaults.com