



TITLE: **Country of Origin Marking**

REVISION DATE: **24-APR-18**

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REVISION HISTORY

Revision History				
Date	Memo	Revision	Author	Change Description
06-MAY-10	GS3038	A	Michelle Hill	Initial Release
04-FEB-11	C448302	B	Michelle Hill	Update to reflect reorg and name change to Motorola Solutions Inc.
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APPROVALS

Sector Specific Approvers		
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1. Objective

1.1. The objective of this document is to define Motorola Solutions, Inc. standards for compliant country of origin marking on products and packaging.

1.2. These standards are not to be construed as legal advice or a substitute for compliance to contradictory governmental regulations. The Exporter / Importer of Record, is legally responsible for understanding and complying with export/import regulations of the countries involved. Motorola Solutions will not be held responsible for failure of an unrelated party to follow applicable export/import regulations.

2. Scope

2.1. Motorola Solutions, Inc. (MSI). For the purpose of this document, all references to “Motorola Solutions” and “MSI” shall be deemed to include Motorola Solutions, Inc. and its affiliates. Motorola Solutions, Inc. “affiliates” includes Vertex Standard USA, Inc.

2.2. This global specification applies to all MSI factories, customer fulfillment centers, and repair service centers that ship internationally.

2.3. MSI requires its suppliers (including, but not limited to direct materials, indirect materials, EMS, ODM, and repair operations) to maintain comparable country of origin compliance programs for the products they provide to MSI or on behalf of MSI.

2.4. Products include raw materials, samples, prototypes, piece parts, and partial and full assemblies. Product and inner packaging may be included according to the requirements and exceptions in this document.

3. Responsibilities

3.1. **Global Trade Compliance.** Provide oversight, guidance, and interpretation of regulations.

3.2. **Local Trade Compliance Operations,** Local trade compliance operations are expected to engage all responsible organizations in a cross-functional effort to develop and maintain a compliant country of origin determination process.

3.3. **Packaging Design.** Comply with requirement by incorporating required markings into packaging specifications for products within the scope of this document.

3.4. **Engineering.** Comply with requirements by incorporating required markings into product labeling specifications and bills of materials for products within the scope of this document.

3.5. **Procurement.** Communicate product marking requirements to foreign vendors. Lead resolution and vendor management when product is non-compliant.



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3.6. Quality/Inspection. Inspect goods for country of origin markings at the time of receipt and report non-compliant product to Procurement via established reporting systems.

3.7. Manufacturing/Warehouse/Repair Operations. Mark country of origin on packaging when shipping to a third party and the original mark is separated from the product or add markings to kit packaging or repacks when markings are obstructed.

4. Abbreviations, Acronyms, and Definitions

(3S) Shipping Label ³	Used to identify a shipment by all parties involved in the shipping/receiving process: supplier, freight company, and customer. Label should be placed in the upright position, in the lower right-hand corner of the smallest face of the box.
(4S) Packing List Label ³	Used to identify a shipment by all parties involved in the shipping/receiving process: supplier, freight company, and customer. Label should be placed on a blank part of the packing list (either front or back). If the supplier can provide a bar coded packing list with the fields listed below, a separate (4S) label is not required. The packing list should be placed in a packing list envelope and the envelope placed in a clearly visible position on the number 1 box of each purchase order shipment.
(5S) Outer pack Label ³	Used to identify a shipment by all parties involved in the shipping/receiving process: supplier, freight company, and customer. Label should be placed in the upright position, in the lower right-hand corner of the smallest face of the <u>outermost shipping container</u> .
BOM	Bill of Materials – a record of all materials used in the production or kitting of an intermediate or finished good.
Certificate of origin ⁷	A certificate of origin is a document that states the country of origin and may be required for importation, meeting letter of credit requirements, or receiving benefits under a trade agreement. To be accepted by the importing country’s Customs agency, the document may have to be certified by a local chamber of commerce, consulate, notary or other government office or agency.



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Country of origin marking ⁷	Country of origin markings are physical marks on products or packaging that identify the country of origin. The purpose of country of origin marking is to inform the ultimate purchaser of the country in which the product was made. Refer to section 6 of the global specification on “Country of Origin Marking (1213933U06)” for detailed guidance on product and package marking requirements, which may vary based on the type of product or package.
Country of origin of goods ⁷	The country of origin of a good is the country of manufacture, production or growth. It is not the country of export or the last country from which the item shipped. Origin is almost always required to be declared to the importing government as part of the importing process. Origin is also a key element in determining applicability of trade agreement benefits to goods. The country of origin of a good is the country in which: <ul style="list-style-type: none"> • The good is “wholly obtained or produced” (see “wholly produced” definition); • The good is produced exclusively from domestic materials; or • Each foreign material incorporated in that good undergoes a substantial transformation.
Declaration of origin ¹	A declaration of origin is a country of origin statement by the manufacturer, producer, supplier, exporter or other competent person on the commercial invoice or any other document relating to the goods.
Documentary evidence of origin ¹	A certificate of origin, a certified declaration of origin or a declaration of origin.
Essential Character ^{4,10}	The factor which determines essential character will vary between different kinds of goods. It may, for example be determined by the nature of the materials or component, its bulk, quantity, weight or value, or by the role of a constituent material in relation to the use of the goods.
External (Tertiary) packaging	Packaging used in the handling and transport of a quantity of Immediate and/or Intermediate packaged units. This packaging is specifically designed to prevent damage during transportation.
Immediate (Primary, Ultimate Purchaser, or Retail) packaging	Packaging designed to be supplied with the sales unit sold to the final user or users at the point of purchase.



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Intermediate (Secondary) packaging	<p>1. Packaging used to group quantities of primary packaged goods. The packaging can be sold along with the units or can be removed before being sold to the final user.</p> <p>2. Rails, foams, reels, bundles, or bags of a single product; and boxes, cartons, bags, or other packages used to contain them. Normally one or more intermediate packages will be bundled to make a shipping pack.</p>
ISO Standard 3166-1 ⁶	<p>The short country names from ISO 3166-1 and the alpha-2 codes are made available by ISO at no charge for internal use and non-commercial purposes. The lists are extracted from ISO 3166-1. They contain all short country names and alpha-2 code elements officially published by ISO and they are updated whenever a change of country name and/or alpha-2 code element is made in ISO 3166-1. (http://www.iso.org/iso/country_codes/iso_3166_code_lists.htm).</p>
ISO country code ⁶	<p>Alpha-2 character country code defined in ISO 3166-1 (http://www.iso.org/iso/country_codes/iso_3166_code_lists.htm).</p>
ISO short country name ⁶	<p>The short country name defined in ISO 3166-1 (http://www.iso.org/iso/country_codes/iso_3166_code_lists.htm).</p>
Non-preferential rules of origin ⁵	<p>“Non-preferential” rules are those that generally apply to merchandise in the absence of trade agreements.</p> <p>Typically, non-preferential rules of origin schemes employ the “substantial transformation” criterion for goods that consist in whole or in part of materials from more than one country.</p>
Originating	<p>Manufactured, produced or grown, in accordance with applicable rules of origin.</p>
Preferential rules of origin ⁵	<p>“Preferential” rules are those that apply to merchandise to determine eligibility for special treatment under various trade agreements or special legislation. Preferential rules of origin often employ schemes other than (or in addition to) “substantial transformation”, including commodity-specific tariff shift rules and regional value content rules. A product that qualifies as originating in a particular country under non-preferential rules of origin does not necessarily qualify as originating in that country for purposes of preferential treatment under a trade agreement.</p>
Rules of origin ¹	<p>the specific provisions, developed from principles established by national legislation or international agreements ("origin criteria"), applied by a country to determine the origin of goods.</p>



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Substantial transformation⁴

A substantial transformation has occurred when an article emerges from a process with a new name, character, or use different from that possessed by the article prior to processing.

If the manufacturing or combining process is a minor one which leaves the identity of the imported article intact, a substantial transformation has not occurred.

No article or material shall be considered to have been grown, produced, or manufactured in a country by virtue of having merely undergone “simple combining or packaging operations”, or mere dilution with water or mere dilution with another substance that does not materially alter the characteristics of the article.

“Simple combining or packaging operations” include, but are not limited to, the following processes:

- Repacking or packaging components together;
- Fitting together a small number of components by bolting, gluing, soldering etc.;
- The addition of batteries to devices;
- The addition of substances such as anti-caking agents, preservatives, wetting agents, etc.;
- Diluting chemicals with inert ingredients to bring them to standard degrees of strength.

The substantial transformation criterion is applied on a case-by-case basis, and it is based on a change in name/character/use (i.e., an article that consists in whole or in part of materials from more than one country is a product of the country in which it has been substantially transformed into a new and different article of commerce with a name, character, and use distinct from that of the article or articles from which it was so transformed).



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<p>Ultimate Purchaser</p>	<p>The “ultimate purchaser” is generally the last person in the importing country who will receive the article in the form in which it was imported.</p> <p>Examples:</p> <p>(1) If an imported article will be used in manufacture, the manufacturer may be the “ultimate purchaser” if he subjects the imported article to a process which results in a substantial transformation of the article.</p> <p>(2) If the manufacturing process is merely a minor one which leaves the identity of the imported article intact (i.e., no substantial transformation), the consumer or user of the article, who obtains the article after the processing, will be regarded as the “ultimate purchaser.”</p> <p>(3) If an article is to be sold at retail in its imported form, the purchaser at retail is the “ultimate purchaser.”</p> <p>(4) If the imported article is distributed as a gift the recipient is the “ultimate purchaser”.</p>
<p>WCO¹</p>	<p>The World Customs Organization (WCO) is the only intergovernmental organization exclusively focused on Customs matters. With its worldwide membership, the WCO is now recognized as the voice of the global Customs community. It is particularly noted for its work in areas covering the development of global standards, the simplification and harmonization of Customs procedures, trade supply chain security, the facilitation of international trade, the enhancement of Customs enforcement and compliance activities, anti-counterfeiting and piracy initiatives, public-private partnerships, integrity promotion, and sustainable global Customs capacity building programs. The WCO also maintains the international Harmonized System goods nomenclature, and administers the technical aspects of the WTO Agreements on Customs Valuation and Rules of Origin.</p>



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Wholly produced ¹	<p>Goods produced wholly in a given country shall be taken as originating in that country. The following only shall be taken to be produced wholly in a given country:</p> <ul style="list-style-type: none"> • mineral products extracted from its soil, from its territorial waters or from its sea-bed; • vegetable products harvested or gathered in that country; • live animals born and raised in that country; • products obtained from live animals in that country; • products obtained from hunting or fishing conducted in that country; • products obtained by maritime fishing and other products taken from the sea by a vessel of that country; • products obtained aboard a factory ship of that country solely from products of the kind covered by paragraph (f) above; • products extracted from marine soil or subsoil outside that country's territorial waters, provided that the country has sole rights to work that soil or subsoil; • scrap and waste from manufacturing and processing operations, and used articles, collected in that country and fit only for the recovery of raw materials; • goods produced in that country solely from the products referred to above.
WTO ²	<p>The World Trade Organization (WTO) is the only global international organization dealing with the rules of trade between nations. At its heart are the WTO agreements, negotiated and signed by the bulk of the world's trading nations and ratified in their parliaments. The goal is to help producers of goods and services, exporters, and importers conduct their business.</p> <p>Functions:</p> <ul style="list-style-type: none"> • Administering WTO trade agreements • Forum for trade negotiations • Handling trade disputes • Monitoring national trade policies • Technical assistance and training for developing countries • Cooperation with other international organizations

5. Reference Documents

Document Description

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Document Description
¹ World Customs Organization, http://www.wcoomd.org
² World Trade Organization, http://www.wto.org
³ Motorola Solutions Receiving Bar Code Specification (1213933A01), https://drive.google.com/open?id=0B-5wD-XGOj54TzVxTjRnV0k5T00
⁴ Customs Rulings Online Search System (CROSS), https://rulings.cbp.gov/
⁵ "What Every Member of the Trade Community Should Know About: U.S. Rules of Origin Preferential and Non-Preferential Rules of Origin", Informed Compliance Publications. May 2004. https://www.cbp.gov/sites/default/files/assets/documents/2016-Apr/icp026_3.pdf
⁶ International Organization for Standardization, http://www.iso.org
⁷ Global Trade Compliance Country of Origin/Marking guidance: https://converge.motorolasolutions.com/community/lga/office-of-ethics-and-global-trade-compliance/customs-compliance
⁹ Harmonized Tariff Schedule of the United States, https://hts.usitc.gov/current
¹⁰ Explanatory Notes to the Harmonized Commodity Description and Coding System (HS- fourth edition 2007), published by the World Customs Organization
¹¹ Country of Origin Product Marking Requirements for Foreign Articles Imported into the U.S. (GTC-003), https://converge.motorolasolutions.com/docs/DOC-24975
¹² U.S. Country of Origin Marking Requirements for Repackaging or Kitting Operations (GTC-004), https://converge.motorolasolutions.com/docs/DOC-24976
¹³ 19 C.F.R. § 134 Country of Origin Marking (US Code of Federal Regulations) https://www.gpo.gov/fdsys/pkg/CFR-2001-title19-vol1/content-detail.html
¹⁴ "Made in U.S.A." Standard (US Federal Trade Commission) https://www.ftc.gov/tips-advice/business-center/guidance/complying-made-usa-standard
¹⁵ 19 C.F.R. § 102 Rules of Origin (US Code of Federal Regulations) https://www.gpo.gov/fdsys/pkg/CFR-2001-title19-vol1/content-detail.html
Country of Origin Marking Chart, https://converge.motorolasolutions.com/docs/DOC-24973
Packaging Requirements for Inbound Shipments to Motorola Solutions (12S10601A), https://drive.google.com/open?id=0B-5wD-XGOj54LVc3a0l6YjVzOFU
Determining Non-Preferential Country of Origin (1213933U04) https://drive.google.com/open?id=0B-5wD-XGOj54MTg1bEwtYkhEd28
Country of Origin Declaration on Invoices (1213933U05) https://drive.google.com/open?id=0B-5wD-XGOj54eEIZdHNuUEImV00

6. Procedure

6.1. Standard.

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6.1.1. Every product must be permanently marked with the non-preferential country of origin at the time of import or export unless exempted in Section 6.7. In general, the marking on the product must be:

- 6.1.1.1. In English
- 6.1.1.2. Easy to read
- 6.1.1.3. Easy to find on the product
- 6.1.1.4. Permanent
- 6.1.1.5. Next to, in the same size and font, as any other geographic name that appears on the product

6.1.2. The local operation is required to document its country of origin marking procedure in writing.

6.2. Marking Visibility and Location. The country of origin marking must be on the product at the time of import or export. The marking must be easy to find and read when handling the product.

6.2.1. Kitting. The purchaser must be able to see the country of origin mark when he or she is handling the article prior to purchase. Options for complying with the marking regulations include: 1) list the country of origin(s) on the packaging or 2) use packaging that can be opened by the ultimate purchaser prior to purchase without compromising the integrity of the packaging or 3) position the product such that the mark can be seen by the ultimate purchaser through the packaging.

6.2.1.1. **Multi-Country Sourced Products.** Markings on labels or packaging with more than one country such as “Made in Singapore or Mexico” are compliant **only if** the ultimate purchaser can inspect the marking on the product prior to purchase without compromising the packaging to determine in which country the product was actually made. Heat sealed clam shells are not packaging that can be opened prior to purchase without being compromised.

6.2.1.2. **Different Products Packaged Together.** When different products are packaged together, each individual product must be marked with its own country of origin. The ultimate purchaser must be able to see the country of origin mark of each product when he or she is handling the product prior to purchase. If the country of origin marks are concealed by the packaging, then the packaging itself must contain the country of origin mark for each product in the kit, and clearly associate each product with its origin. Statements on the packaging such as “Imported Articles Individually Marked with Country of Origin” are acceptable **only if** the ultimate purchaser can see the product markings either through the outer packaging or by opening the packaging, without compromising its integrity, prior to purchase. Heat sealed clam shells are not packaging that can be opened prior to purchase without being compromised.

Example: Portable Radio Kits – When a portable two-way radio is packaged together with a battery, charger, and headset as a kit, the radio imparts the essential character of the kit for

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purposes of country of origin declaration on the invoice (see 1213933U05). However, all items in the kit must be individually marked with country of origin, and the marking must be visible to the ultimate purchaser prior to purchase in accordance with this section.

6.2.1.3. Packaging Materials, Inserts and Manuals. If the packaging or printed materials are substantial and it is intended that the ultimate purchaser would save and reuse the material, then country of origin marking on the packaging or printed materials is required.

6.3. Language.

6.3.1. The country of origin mark must be the full country name, legible and in English. Abbreviations, such as “PRC”, or ISO country codes such as “CN” are not valid markings for “China”.

6.3.2. Marking in a language other than English may be required, depending on importing government regulation. Consult with local Trade Compliance Operations and regional Global Trade Compliance for guidance.

6.4. Wording.

6.4.1. “Made in the EU”, “Made by Motorola Solutions”, and similar statements that do not indicate a valid country name do not satisfy the country of origin marking requirement. “European Union” and “Motorola Solutions” are not valid country names.

NOTE: Certain regulatory agencies require the company name “Motorola Solutions” to be printed on product labels, so please consult with Motorola Solutions Regulatory Compliance experts before removing the company name from any label.

6.4.2. The following are the most common ways to mark country of origin on a product. Consult with local regulations concerning government restrictions on using particular words to indicate country of origin.

6.4.2.1. “Made in [name last country of substantial transformation]”

Example: “Made in Malaysia”

6.4.2.1.1. Domestic products. Several countries have regulations that limit the use of the phrase “Made in [domestic country name]”, to products that are made of “all or virtually all” domestic content if the product is intended to be sold or advertised domestically. “All or virtually all” means that all significant parts and processing that go into the manufacture of the product must be of domestic origin. The product should contain no (or negligible) foreign content.

Example: The US Federal Trade Commission restricts the use of “Made in USA” marking to products made of “all or virtually all” US content. In most cases, products that have been substantially transformed in the US should be marked “Assembled in USA”, or a qualified statement, such as, “Made in USA of foreign and domestic materials”.

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6.4.2.1.2. Imported products. Countries that restrict the use of the phrase “Made in [domestic country name]” typically do not regulate the use of the phrase “Made in [foreign country name] for imported products that have been substantially transformed in the named origin country.

Example: “Made in” is acceptable in the US for imported products that have been substantially transformed in a non-US country, for example, “Made in China”.

6.4.2.2. “Assembled in [name last country of substantial transformation]”

6.4.2.2.1. “Assembled in” is typically allowed where the product includes non-negligible foreign content, and use of the phrase “Made in” is restricted to products that are made of “all or virtually all” domestic content.

Example: The last substantial transformation of a product occurs in the United States. The bill of materials includes both foreign and domestic materials, so “Made in” is not allowed. The product should be marked “Assembled in United States”.

6.4.2.2.2. “Assembled in” should only be used when the assembly operation results in a substantial transformation of the article. If the domestic assembly operation does not result in substantial transformation of an imported article, the foreign country of origin marking of the imported article should remain intact.

*Example: A product marked “Made in Singapore” is imported into the United States and a kitting or simple assembly operation that does **not** result in substantial transformation occurs at a US factory. The product marking “Made in Singapore” should be left intact. The US distribution center should NOT add a label that says “Assembled in United States”.*

6.4.2.2.3. Some countries (Korea, for example) specifically require country of origin to be preceded by the phrase, “Made in”, and will not accept “Assembled in”. Many countries prefer “Made in”, even if “Assembled in” is accepted.

6.4.2.2.3.1. Refer also to the Country of Origin Marking Chart on Compass for up-to-date country-specific preferences/requirements regarding language.

6.4.2.2.3.2. When “Made in” is not acceptable for an English-speaking importer, some operations have had success complying with non-English speaking country requirements by adding a translation of “Made In” in languages other than English.

6.4.2.3. “Cell origin: XXX, Finished in YYY” (Batteries only), where XXX is the country of origin of the battery cell, and YYY is the country where the battery pack is finished.

Example: “Cell origin: Japan, Finished in: Malaysia”

Exception: In Asia, some countries require “Made in YYY”, where YYY is the country in which the battery pack is finished. Marking batteries sold both in Asia and in other regions with “Made in YYY” in Chinese, as well as “Cell origin: XXX, Finished in: YYY”, in English may be a solution that is acceptable globally.

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6.4.2.4. "Printed in XXX" (Printed materials only)

6.4.2.5. "Recorded in XXX" (Recorded media only)

6.4.3. Refer also to the [Country of Origin Marking Chart](#) on Converge for up-to-date country-specific preferences/requirements.

6.5. Permanent Marking. The country of origin marking must be permanent such that it remains on the product through regular handling. Some governmental regulations require that the markings be die-sunk, molded, etched, under a glaze or imprinted on paper according to the nature of the material. Adding hangtags or stickers on a product are acceptable only if they remain on the product through regular handling. Permanent marking is preferred over hangtags or stickers.

6.6. Proximity to Other Country Identification. The country of origin must be clear. If a geographic locality is present on product that is different than the country of origin, the actual country of origin mark must be placed in close proximity to the other geographic reference in equal size and font. For example, if an art card has "Motorola Solutions Inc, Schaumburg, IL" on the card and the product is made in Malaysia, "Made in Malaysia" must appear next to or below "Schaumburg, IL" in equal size and font.

6.7. Exemptions to Marking the Product. Marking the country of origin on the packaging closest to the product instead of the product itself is acceptable for:

6.7.1. Small. Products too small to mark (i.e. semiconductor components, mark the reel).

6.7.2. Material. Materials that are incapable of being marked (i.e. liquids, mark the container).

6.7.3. Substantial Transformation. This exemption applies only to articles that will undergo further processing by the importer that will result in substantial transformation before shipping to the end user. If further processing by the importer will not result in substantial transformation, the article will not be exempt from marking.

6.7.4. Importing government(s) do not require marking. *Marking all product, regardless of importing country marking requirement is strongly recommended by Motorola Solutions Corporate Global Trade Compliance.*

The exporting operation must confirm that none of the importing country governments require marking, and must have a documented and controlled process in place to ensure country of origin marking is compliant for any exception shipment to a country that does require marking.

If the importer is a Motorola Solutions facility, the exporting operation must also confirm that the importing Motorola Solutions facility will not be exporting the product to any government that requires marking, and that the importing Motorola Solutions facility has a documented and controlled process in place to ensure country of origin marking is compliant for any exception shipment to a country that does require marking.

Refer to the [Country of Origin Marking Chart](#) for guidance on countries that do not require marking.

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6.7.5. Other. To be reviewed by local trade compliance operations and regional Global Trade Compliance on a case-by-case basis.

6.8. Maintaining Marking for Third-Parties. If a Section 6.7 exemption to marking the product is used to be compliant with the government regulations, but the product is separated from the original country of origin mark because it is removed from its original packaging and sent to another manufacturing, distribution, repair or retail point, a country of origin mark, consistent with the requirements stated above, must be added to the product or packaging prior to shipping.

Example. One hundred transistors are removed from the reel in which they were originally imported. The reel was marked with country of origin “China”, but the transistors themselves were not marked. If these transistors must be shipped to another country, the new packaging containing the 100 transistors will need to be marked with country of origin “China”.

6.9. Product-specific Requirements. For certain products, the country of origin is based on the exporter or importer government’s interpretation of rules of origin. Consult with the importer or in-country trade compliance for guidance on country of origin declaration exceptions by product category.

Example. Batteries: mark both “Cell Origin: XXX” and “Finished in YYY”, if possible. Otherwise, mark either the battery cell origin or the place of final assembly, based on the requirement of the importing government.

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6.10. Repair.

6.10.1. Where possible, repair centers must work with shippers (customers or 3PL's) to ensure the correct country of origin is marked on the product and packaging.

6.10.2. Repair centers must visually inspect each part for correct country of origin marking.

6.10.2.1. Ensure each part is properly marked with country of origin.

6.10.2.2. Ensure the correct country of origin is indicated on the export invoice.

6.10.3. If a part requires marking and is not marked, repair centers must have a documented process to determine the correct country of origin and mark accordingly before shipping the part back to the customer.

6.11. Removal and alteration of Country of Origin Marking. Any intentional removal, defacement, destruction, or alteration of a marking of country of origin in order to conceal the true country of origin shall be considered a violation of the Motorola Solutions Code of Business Conduct, and may be treated as a criminal offense in certain countries, including the United States. Suspected violations should be reported to local management, Corporate Global Trade Compliance, and/or through the Motorola Solutions EthicsLine (<http://ethics.mot-solutions.com>).

7. Quality Control

7.1.1. Quality audits must be conducted on a representative sample of imported part numbers received and part numbers exported. The "representative sample" shall be defined by each site in local documented procedures. Consult the appendix of this document for an example sampling plan (sites may develop their own sampling plan, and are not required to follow the sampling plan described in this document). *Alternative method for imported parts.* At the discretion of the site, COO quality audits for imported parts may be incorporated into the local 100% "first article inspection" process in lieu of regular quality audits conducted on a representative sample.

7.1.1.1. If this alternative method is selected, the site COO procedures must reference the applicable "first article inspection" procedure to address imported part COO compliance.

7.1.1.2. The "first article inspection" procedure must verify COO compliance for all applicable parameters set forth in section 7.6 of this document.

7.1.2. No alternative method for exported part COO compliance.

7.2. Country of origin must be determined in compliance with "Determining Non-Preferential Country of Origin" (1213933U40)

7.3. Country of origin declaration on invoices must comply with Motorola Solutions global specification on "Country of Origin Invoice Declaration" (1213933U05).

7.4. Country of origin marking on products must comply with Motorola Solutions global specification on "Country of Origin Marking" (1213933U06).

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7.5. Inbound (lines imported) and outbound (lines exported) parameters may be audited and reported separately, at the discretion of the site).

7.6. Parameters

7.6.1. Verify that the country of origin indicated on the carton labels matches country of origin marked on the product. If the product is "incapable of being marked", the country of origin indicated on the carton labels must match country of origin marking on the immediate product packaging (baggie, reel, container, etc.). Applicable to all sites, inbound (import invoice) and outbound (export invoice).

7.6.2. Verify that the country of origin marked on the product matches the country of origin declared on the invoice. Applicable to all sites, inbound (import invoice) and outbound (export invoice).

7.6.3. Verify that the barcode on carton labels indicates the correct country of origin, if applicable. May be applicable inbound, outbound, or both.

7.6.4. Verify that the country of origin recorded in the local database or ERP is correct, if applicable. If local procedures do not involve capturing country of origin to a database or ERP, this parameter does not apply. May be applicable inbound or outbound.

7.7. Calculations

7.7.1. The compliance rate for each measurement is calculated using the formula: [Number of compliant lines / (number of lines audited x number of parameters applicable)] x 100%.

Example: [85 compliant lines / (100 lines audited x 3 parameters)] x 100% = 85/(100x3) x100% = 85%.

7.8. Root cause analysis and corrective action is required for all deficiencies.

7.9. Quality audits must be conducted monthly if the compliance rate falls below 95%, and may move to a quarterly schedule once 95% compliance is maintained at least two months in a row.

7.9.1. Parts previously verified. Random sampling will likely result in a part number that has already been verified re-appearing in subsequent audit samples. The site owner of the quality audit process should determine, based on historic performance and confidence in process controls, whether a part is at high or low risk of failing future audits.

7.9.1.1. High risk parts. Parts deemed by the site to be at high risk of falling out of compliance before the next scheduled audit must be re-verified at least once per quarter.

7.9.1.2. Low risk parts. Parts deemed by the site to be at low risk of falling out of compliance before the next scheduled audit must be re-verified at least once per year.

7.10. Results must be shared with senior management and with functional teams responsible for pursuing corrective actions.

7.10.1. Non-compliant import invoice findings must be shared with the local import manager.

7.10.2. Non-compliant export invoice findings must be shared with the local export manager.



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7.10.3. Other responsible functional teams responsible for pursuing corrective actions may include (but may not be limited to): procurement, purchasing, receiving, shipping, manufacturing, engineering, and new product introduction.

8. Appendix

8.1. Example Sampling Plan

8.1.1. This is only an example. Sites are not required to follow this specific sampling plan. The "representative sample" shall be defined by site in local procedures.

8.1.2. Sampling plan based on:

8.1.3. ANSI / ASQC Z1.4 – 1993

8.1.4. Table 1: Define the monthly lines shipped as OUTBOUND

Example: 1278 lines



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Steps 1 to 3: Define sampling lot selection Letter

TABLE I—Sample size code letters

Step 2:
Select Sampling Plan

(See 9.2 and 9.3)

CODE
LETTERS

Lot or batch size	Special inspection levels				General inspection levels		
	S-1	S-2	S-3	S-4	I	II	III
2 to 8	A	A	A	A	A	A	B
9 to 15	A	A	A	A	A	B	C
16 to 25	A	A	B	B	B	C	D
26 to 50	A	B	B	C	C	D	E
51 to 90	B	B	C	C	C	E	F
91 to 150	B	B	C	D	D	F	G
151 to 280	B	C	D	E	E	G	H
281 to 500	B	C	D	E	F	H	J
501 to 1200	C	C	E	F	G	J	K
1201 to 3200	C	D	E	G	H	K	L
3201 to 10000	C	D	F	H	J	L	M
10001 to 35000	C	D	F	H	K	M	N
35001 to 150000	D	E	G	J	L	N	P
150001 to 500000	D	E	G	J	M	P	Q
500001 and over	D	E	H	K	N	Q	R

Step 1:
Select lot size

Step 3

Step 1: Find on "Lot or batch size" column, the appropriate batch (1201 to 3200 as sample)

Step 2: Use General Sampling column (II)

Step 3: Use the : Sampling size qty is "K"

8.1.5. Table II-A:



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Steps 4 to 5: Define sampling lot Qty

Table II-A—Single sampling plans for normal inspection (Master table)

(See 9.4 and 9.5)

Sample size code letter	Sample size	Acceptable Quality Levels (normal inspection)																											
		0.010	0.015	0.025	0.040	0.065	0.10	0.15	0.25	0.40	0.65	1.0	1.5	2.5	4.0	6.5	10	15	25	40	65	100	150	250	400	650	1000		
		Ac Re	Ac Re	Ac Re	Ac Re	Ac Re	Ac Re	Ac Re	Ac Re	Ac Re	Ac Re	Ac Re	Ac Re	Ac Re	Ac Re	Ac Re	Ac Re	Ac Re	Ac Re	Ac Re	Ac Re	Ac Re	Ac Re	Ac Re	Ac Re	Ac Re	Ac Re	Ac Re	
A	2																												
B	3																												
C	5														0 1														
D	8																												
E	13																												
F	20																												
G	32																												
H	50																												
I	80																												
K	125																												
L	200																												
M	315																												
N	500																												
P	800																												
Q	1250																												
R	2000																												

Step 4: Find the letter "K" on the "Sample size lot letter" column

Step 5: Identify the qty to be sampled on the "Lot Size" column

Sample size is 125 outbound lines for the month if total lines shipped is 1278.