

Pentek Counterfeit Electronic Part Detection and Avoidance System

(Revision 03-08-2021)

Definitions

Authorized Supplier:

a supplier or distributor that has a contractual arrangement with, or the express written authority of, the original manufacturer or current design activity to buy, stock, repackage, sell, or distribute the part.

Counterfeit Electronic Part:

an unlawful or unauthorized reproduction, substitution, or alteration that has been knowingly mismarked, misidentified, or otherwise misrepresented to be an authentic finished product. Unlawful or unauthorized substitution includes used electronic parts represented as new, or the false identification of grade, serial number, lot number, date code, or performance characteristics.

Electronic Part:

an integrated circuit, a discrete electronic component (including, but not limited to, a transistor, capacitor, resistor, or diode), or a circuit assembly.

Obsolete Electronic Part:

an electronic part that is no longer available from the original manufacturer or an authorized distributor.

Original Component Manufacturer:

an organization that designs and/or engineers a part and is entitled to any intellectual property rights to that part.

Suspect Counterfeit Electronic Part:

an electronic part for which credible evidence (including, but not limited to, visual inspection or testing) provides reasonable doubt that the electronic part is authentic.

1. Pentek maintains a counterfeit electronic parts control plan that meets, as a minimum, the requirements defined in the latest release of DFARS 252.246-7007.

2. Authorized electronic part suppliers shall have a counterfeit electronic parts control plan that meets, as a minimum, the requirements defined in the latest release of DFARS 252.246-7007 and DFARS 252.246-7008.
3. Pentek implements processes for the prevention and detection of counterfeit electronic parts in the following areas:
 - a. Sales – providing policy information and adhering contract requirements
 - b. Purchasing – requiring supplier flowdown
 - c. Inspection – training and 100% inspection
 - d. Product Design – engineering design specifications
 - e. Manufacturing – knowledge of product and component specifications
4. Pentek designs, maintains, and tracks ongoing inspection training classes for the identification of counterfeit electronic parts.
5. Inspection personnel make use of purchase orders, specifications, drawings, pictures, descriptions, magnification equipment, erai.com, and etc. to identify counterfeit electronic parts.
6. Pentek performs a 100% inspection of all incoming electronic parts.
7. All identified counterfeit electronic parts and suspect counterfeit electronic parts are segregated and then quarantined.
8. All segregated and quarantined counterfeit parts and suspect counterfeit parts are identified as nonconforming.
9. All segregated and quarantined counterfeit parts and suspect counterfeit parts are made available for investigation by those customers that ordered products containing those specific parts.
10. The specific customer will be notified of the identified counterfeit electronic parts and suspect counterfeit parts within five business days of detection.
11. Pentek requires its authorized electronic parts suppliers to maintain and make available traceability documentation back to the original manufacturer. The supplier shall maintain this documentation for seven years from the date of electronic component delivery to Pentek.
12. Pentek requires flowdown of counterfeit electronic part detection, as described in DFARS 252.246-7007 to its subcontractors.

13. Pentek procures electronic parts from the original component manufacturer or its authorized distributor/authorized supplier.
14. Pentek purchase orders reference supplier counterfeit electronic part detection flowdown requirements.
15. Pentek maintains a supplier rating system based on ISO certification, competitive pricing, on-time delivery, order accuracy, condition of product, counterfeit parts prevention, and follow-up times. An approved supplier that provides counterfeit parts will be removed from the Pentek approved supplier list until all nonconformances have been corrected.
16. Pentek maintains a membership with GIDEP for engineering use.
17. Pentek makes a product obsolescence status notification available to customers that sign up for “YourPentek” notifications after creating a Pentek website account.
18. Pentek’s website, www.pentek.com, identifies the life cycle management for each of its listed products. Pentek's Life Cycle Management system allows those interested in tracking Pentek products to obtain the current life cycle status of any product. Each product's summary page on Pentek's website will specify the current Life Cycle phase of the product.
19. If the customer purchases a Pentek product and contracts for the requirement of electronic parts from the original component manufacturer or its authorized supplier and those parts are not available then the customer is to provide written approval for Pentek to purchase parts from another supplier.
20. Pentek's Life Cycle Management system automatically notifies the customer when the current life cycle phase of any product is updated. To sign up: [register](#) or [login](#) on Pentek's site, set up a YourPentek account, and select the product(s) of interest.
21. Pentek offers a bonded inventory program to guarantee availability of a specified quantity of at-risk products due to end-of-life/obsolescence by the original component manufacturer. Pentek’s bonded inventory program consists of the following:
 - a. Pentek will acquire and reserve a sufficient number of kits with all electronic components required to build the specified quantity of products.
 - b. The customer will pay for the components purchased for bonded inventory, plus a management fee for administrating the program.
 - c. The customer may order any quantity of products up to the specified quantity any time during the program or at the end of the program.

- d. Pentek will issue a credit for the cost of the bonded inventory components used to produce the ordered products.

(End of statement)