

## **CLIENT ALERT**

### **Software Application Insufficient to Substantially Transform Existing Hardware Components Into a Visitor Management System**

**May.19.2017**

In a [Final Determination](#) published in the Federal Register today, Customs & Border Protection held that application software installed on existing computers and on an ID scanner manufactured in China did not substantially transform the individual elements (IS scanner, labels, printer and barcode scanner) of the Visitor Management System. The scanners and printers functioned as such when imported, and the software, while defining a specific use, did not change the basic function of the hardware. Although the FAR contemplates that an “end product” offered under a TAA-covered contract should have a single country of origin, the CBP found each element of the VMS retained its individual country of origin, two of which were from China, a non-designated country.

For more information, please contact the professional(s) listed below, or your regular Crowell & Moring contact.

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