

CLIENT ALERT

With More to Come, DoD Expands Reach of Detection and Avoidance of Counterfeit Parts Requirements

August 2, 2016

Today, DoD published a [final rule](#) further – but still only partially – implementing the FY12 DoD Authorization Act requirement (since amended) for detection and avoidance of counterfeit electronic parts by imposing on all contractors and subcontractors, including small businesses and suppliers of COTS products and commercial items, traceability obligations and procedures for identifying “contractor approved sources” when electronic parts are unavailable from the original manufacturer or other source identified in the new clause (DFARS 252.246-7008). The new clause also provides for specific procedures to be followed, including notifying DoD and performing authentication, inspection, and testing to industry standards when electrical parts are obtained from subcontractors that refuse flowdown of the clause or from sources other than those expressly authorized under the clause.

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

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