



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF TRANSPORTATION

September 18, 2025

Department Construction Contractors

Re: FHWA's Buy America Construction Non-Domestic Source of Supply Update

Dear Department Construction Contractors:

A pair of letters dated, August 14, 2025 (to all Bulletin 15 manufacturers) and August 21, 2025 (directly to Bulletin 15 non-domestic manufacturers), were sent out to outline the Department's intentions to update its Bulletin 15, Qualified Products List for Construction, and remain Buy America compliant.

These letters referenced the published Federal Highway Administration (FHWA) Final Rule ending its Manufactured Products General Waiver and amending its Buy America requirements.

The two phases of implementation for the FHWA Final Rule are:

- Projects obligated on or after October 1, 2025, must comply with the Final Assembly Requirement.
- Projects obligated on or after October 1, 2026, must comply with the Final Assembly Requirement and the 55 Percent Requirement.

The Department intends to remove the enclosed listing of non-domestic manufactured products from its Bulletin 15 to comply with the federal Buy America law. These products are approved for use on projects advertised prior to October 1, 2025 and will remain listed in Bulletin 15 until January 2026 to allow contractors time to submit their Source of Supply in PennDOT's Engineering and Construction Management System (ECMS) for those projects.

For projects advertised prior to October 1, 2025, the attached list of non-domestic products may be used as long as the project's Source of Supply has been accepted by the Department before January 30, 2026.

For projects advertised on or after October 1, 2025, the attached list of non-domestic products shall not be used on Department projects.

Products listed in Bulletin 15 will continue to be the Department's qualified products list and will be considered Buy America compliant.

If you have any questions, please contact Matthew B. Briggs, Chief, New Products and Innovations Section, at 717.346.1581 or mabriggs@pa.gov.

Additional Buy America References

- FHWA Final Rule: <https://www.federalregister.gov/d/2024-31350>
- Buy America definitions: [eCFR :: 2 CFR Part 184 -- Buy America Preferences for Infrastructure Projects](#)
- Additional Buy America information: <https://www.transportation.gov/office-policy/transportation-policy/made-in-america>

Sincerely,


Christine Norris, P.E.
Deputy Secretary for Highway
Administration

Enclosure

4813/MBB/mst

cc: Federal Highway Administration, Pennsylvania Division
Pennsylvania Turnpike Commission
Robert Latham, Associated Pennsylvania Constructors
Peter Vlahos, Pennsylvania Aggregates and Concrete Association
Charlie Goodhart, Pennsylvania Asphalt Pavement Association
John Becker, P.E., American Concrete Pavement Association, Pennsylvania
Brent Sailhamer, American Council of Engineering Companies of Pennsylvania
Rex Eberly, Pennsylvania Association of Asphalt Material Applicators
Brian Watson, American Traffic Safety Services Association
Jonathan Eboli, P.E., Highway Administration
District Executives
Highway Administrative Bureau Directors
Gavin Gray, P.E., Highway Administration

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Andrea Bahoric, Bureau of Planning and Research
Assistant District Executives for Construction
Assistant District Executives for Design
Assistant District Executives for Maintenance
Assistant District Executives for Operations
Jason Wolgemuth, Office of Chief Counsel
Garth Bridenbaugh, P.E., Bureau of Construction and Materials
Timothy Ramirez, P.E., Bureau of Construction and Materials
Matthew Briggs, Bureau of Construction and Materials
Daryl St. Clair, P.E., Highway Administration
District Materials Engineers/Managers
Melissa Turner, Bureau of Construction and Materials

Non-Domestic Products to be Removed from Bulletin 15 on January 30, 2026

<u>Product Type</u>	<u>Supplier Code</u>	<u>Bulletin 15 Section</u>	<u>Company Name</u>
Dowel Bar Adhesive	DEWA1 15	501.2(p)	DEWALT Anchors
Dowel Bar Adhesive	HILT1 15	501.2(p)	Hilti, Inc.
Dowel Bar Adhesive	ITWRH 15	501.2(p)	ITW Commercial Construction North America
Premolded Expansion Joint Filler	STEIC 15	705.1	Steico SE
Lubricant Adhesive	RASCP 15	705.4(d)1.b	Royal Adhesives and Sealants
Joint Backing Material	ALCOT 15	705.8	Alcot Plastics Ltd.
Joint Backing Material	INDUS 15	705.8	Armacell LLC
Epoxy Powder	3MC-1 15	709.1(c)1	3M Company
Repair/Patch Material	SPEPC 15	709.1(c)2.b	Specialty Polymer Coatings Inc
Class 3 Geotextile	CART1 15	735.1(b)	Carthage Mills
Class 3 Geotextile	KANDOI15	735.1(b)	Kandoi Techfab Private
Class 3 Geotextile	NCIF1 15	735.1(b)	NCIF USA Corp
Class 3 Geotextile	THRL2 15	735.1(b)	Thrace Group
Class 4, type A	TEXEL 15	735.1(b)	Texel Technical Materials, Inc.
Class 4, Type C	THRL2 15	735.1(b)	Thrace Group
Geomembrane	LAYF1 15	736	Layfield USA Corporation
Geomembrane (High Density Polyethylene)	SOLMX 15	736	Solmax International, Inc.
Class 1 Uniaxial Geogrid	ACEGE 15	738.2	Ace Geosynthetics Inc.
Class 1 Uniaxial Geogrid	STRATA15	738.2	Strata Systems
Video Detector	LEDTI 15	956.2(c)	LeddarTech, Inc.
Pedestrian Detection - APS	NOVIC 15	956.2(d)	Novac Industries Corporation
Highway Light Pole	METPL 15	1101.02	Metal Pole-Lite, Inc.
Cobra Head LEDs	ACUITY15	1101.06(c)	Acuity Brands Lighting, Inc.
Cobra Head LEDs	CLS-1 15	1101.06(c)	Cooper Lighting Solutions
Cobra Head LEDs	SIGN1 15	1101.06(c)	Signify/Genlyte Solutions
Electric Powered Traffic Signs	ORANG 15	1103.03(g) to (n)	Orange Traffic
LED Lane Use Signal Head	ORANG 15	1104.06(g)	Orange Traffic
Video Detection System	LEDTI 15	1104.07(b)2	LeddarTech, Inc.
Accessible Ped Signal	NOVIC 15	1104.07(c)2	Novac Industries Corporation
Anchoring Adhesive	SIKA5 15	MISC Anchor Devices	Sika Corporation / 2K Polymer Systems Limited
Geosyn Clay Liner	BNTFX 15	MISC Clay Liner	TAG Environmental, Inc., Division of Terrafix
In Road Warning Light	ASTUL 15	MISC Road Warn	Astucia (UK), Ltd.

For projects advertised prior to October 1, 2025, these non-domestic products may be used as long as the project's Source of Supply has been accepted by the Department before January 30, 2026.

For projects advertised on or after October 1, 2025, these non-domestic products shall not be used on Department projects.