



**Transportation
Security
Administration**

**Electronic Baggage Screening Program TSA
Funding of Checked Baggage Inspection System
Projects Costs Version 5.0**

Submitted by: James Stephens, Planning & Procurement Branch Manager
Electronic Baggage Screening Program
Acquisition Program Management
Transportation Security Administration

Approved by: **BRAD J ANDERSON** Digitally signed by BRAD J ANDERSON
Date: 2021.10.27 15:19:01 -04'00'
Date: _____
Brad Anderson, Program Manager
Electronic Baggage Screening Program
Acquisition Program Management
Transportation Security Administration

Approved by: **KERRY A TOSCANO** Digitally signed by KERRY A TOSCANO
Date: 2021.11.04 10:17:49 -04'00'
Date: _____
Kerry Toscano, Division Director
Security Technology Acquisition Division
Contracting & Procurement
Transportation Security Administration

Table of Contents

Section A. Introduction.....	3
Section B. Funding Application and CBIS Project Types Eligibility	3
Section C. Allowable, Allocable and Reasonable Costs.....	6
C.1 Allowable Design Costs	6
C.2 Allowable Construction Costs	7
C.3 Allowable Project Management, Construction Management, and Contingency Costs	10
C.4 Unallowable Costs	11
Appendix. Revision Summary	14
Version 5.0	14

Section A. Introduction

49 U.S.C. §44923 authorizes the Transportation Security Administration (TSA) to make other transaction agreements with Project Sponsors for:

1. Projects to replace baggage conveyer systems related to aviation security;
2. Projects to reconfigure terminal baggage areas as needed to install explosive detection systems;
3. Projects to enable the Under Secretary to deploy explosive detection systems behind the ticket counter, in the baggage sorting area, or in line with the baggage handling system; and
4. Other airport security capital improvement projects.

TSA utilizes Other Transaction Agreements (OTAs) as funding instruments to reimburse Project Sponsors for eligible aviation security projects. Project Sponsors may obtain any additional information, guidance, and applications for funding at: <http://www.tsa.gov/for-industry/electronic-baggage-screening>.

Acquisition Program Management (APM) within TSA is responsible for managing the Electronic Baggage Screening Program (EBSP). EBSP's mission is to satisfy the requirements of the Aviation and Transportation Security Act (ATSA, Pub.L. 107–71 November 19, 2001). ATSA requires that all checked baggage be screened using explosive detection technology. EBSP's mission is to deploy and maintain screening technology in support of ATSA requirements.

EBSP develops an annual spend plan by prioritizing and then selecting aviation security improvement projects that meet the Program's mission. EBSP selects projects that will achieve the maximum increase in security capability within the funding appropriations set by Congress.

The Planning Guidelines and Design Standards (PGDS) for Checked Baggage Inspection Systems (CBIS) details TSA's requirements and documented best practices for implementing a high performance and cost-effective CBIS. The PGDS is available at <https://sam.gov/opp/5223ca7b095942749bde423905f507d7/view>.

TSA is not a party to the contracts a Project Sponsor executes with third parties in support of a TSA CBIS project. The Project Sponsor (including its appropriate procurement authority) is the responsible contractual authority for establishing and administering the contract agreements. The Project Sponsor is responsible for all contractual matters, including evaluation and award of contract, resolution of claims and disputes, and settlement of litigation issues regarding the satisfaction of all contractual and administrative issues arising from procurements entered into in support of a TSA CBIS project, without recourse to TSA. This includes, but is not limited to, disputes, claims, protests of award, source evaluation, or other matters of a contractual nature.

Section B. Funding Application and CBIS Project Types Eligibility

Design and Facility Modification OTA Applications are the primary vehicles through which TSA invites communication from a Project Sponsor regarding project needs and funding requests, thereby providing a controlled manner for a Project Sponsor to submit funding requests. This process allows

for proper tracking and handling of funding requests and subsequent communications between TSA and the Project Sponsor.

The Project Sponsor should be aware while making an OTA application submission that TSA will accept all OTA applications on a continuous basis at CBTPlanning@tsa.dhs.gov.

The Project Sponsor is strongly encouraged to coordinate with local and headquarters TSA entities via TSA Project Coordinators as early as possible when CBIS projects are being considered and conceptually planned. Early notification assists TSA in justifying and budgeting federal funding for the EBSP. Similarly, TSA Project Coordinators will also notify airports as early as possible when a TSA-initiated project is being forecasted or considered at their location.

The different types of projects are typically categorized as shown in the following table:

Table 1: Project Types and Funding Eligibility

Project Type	Definition	Initiated By	TSA Funding Eligibility
New In-Line	Full In-line system replacing non-in-line equipment	Airport	Eligible
Recapitalization	Targeted replacement of existing EDS	TSA	Eligible
Optimization	Improvement/replacement of existing in-line system by airport	Airport	Eligible (for the equivalent recapitalization amount)
PGDS Upgrades	Targeted improvements to existing system by TSA	TSA	Eligible
Growth	Increase to screening capacity of existing in-line system	Airport	Ineligible

1. **New In-line** – A new in-line project creates a fully integrated baggage screening system that is built to replace non-in-line screening equipment (previous screening for the airport must have been via stand-alone EDS, semi-integrated EDS, mini-inline EDS, or primary ETD equipment). New fully integrated In-line projects with sufficient baggage demand are eligible for TSA funding.

The following two metrics shall be used to determine if an airport/zone should be converted to a full in-line system. When at least one of the two criteria below is met, a project is considered eligible for EBSP funding:

- Surged 85% bag per hour rate of 400 bags per hour after growth to DBU
- Peak month average daily bag count of 1,600 bags/day after growth to DBU

In the case of a new in-line system replacing a combination of existing in-line and non-in-line screening equipment, TSA funding will be prorated based on the non-in-line portion of overall baggage being screened by the new system. E.g., an airport building a new in-line system that replaces an existing in-line system that currently screens 70% of overall bags and a stand-alone zone that screens 30% of bags would be funded at 30% of the allowable project amount.

New mini-inline projects are not eligible for TSA funding. Mini in-line systems will continue to be

included and updated in the Planning Guidelines & Design Standards (PGDS) document and airports can continue to pursue this solution without TSA funding.

2. **Recapitalization** – Recapitalization projects are TSA-initiated projects that replace existing screening equipment due to technical obsolescence. The scope of a recapitalization project is limited to only those actions necessary to replace existing screening equipment while maintaining existing capabilities and is defined by TSA in advance.

TSA currently reimburses airports 100% of the total project costs (design and construction) for the limited scope of straight recapitalization. Any additional work that an airport would like to conduct beyond the recapitalization scope is considered optimization activity. Recapitalization projects are eligible for TSA funding.

3. **Optimization** – Optimization projects are airport-initiated modifications to, or replacement of, an existing full in-line system for any reason other than screening equipment recapitalization. Optimization projects or activities are not eligible for TSA funding, with the exception of projects that are triggered by a TSA-initiated recapitalization project. In this situation, where the Airport chooses to execute scope above and beyond the pre-defined scope of Recapitalization, TSA would be responsible for the costs of the recapitalization scope and the Airport will take responsibility for the costs of any scope beyond straight recapitalization.

To be eligible for recapitalization-triggered optimization funding, the following requirements must be met:

- The project must be executed within the timeline TSA budgeted and planned to carry out the recapitalization project. Should the project be delayed, the funding for it will be canceled and TSA will move ahead with recapitalization.
 - The project must be used to replace equipment being recapitalized.
 - The TSA Project Coordinator will execute an independent government cost estimate to determine the costs of the recapitalization project. This amount will be presented to the Project Sponsor and should be agreed upon in advance of the project.
4. **PGDS Upgrades** – PGDS Upgrade projects are TSA-initiated efforts to close gaps between existing system capabilities and current PGDS requirements. PGDS Upgrade projects are eligible for TSA funding.
 5. **Growth** – Growth projects upgrade and/or add screening equipment to an existing in-line system to account for demand beyond existing system capacity. These projects are not eligible for TSA funding.

A Project Sponsor may apply for design project funding prior to the start of any design engineering. Any project costs incurred by the Project Sponsor prior to receiving a fully executed OTA from TSA are ineligible for reimbursement. For projects in which the Project Sponsor has already completed a portion of the project design without funding from TSA, the Project Sponsor may apply for funding of the remaining design costs. As every project is unique, the Project Sponsor must be cognizant of the terms and conditions associated with their respective OTA in order to ensure that potential costs meet the requirements for reimbursement.

While not needed for the initial application, the Project Sponsor must submit a quote from their

designer, including all allowable costs for the design effort, in order for TSA to award a Design OTA. Similarly, for a facility modification OTA, the Project Sponsor must have obtained bids, determined the prospective winning bidder, and provided bid information in CWE format to TSA before TSA will award an OTA.

The Project Sponsor is strongly encouraged to submit their application for Facility Modification project funding early in design; TSA recommends that this be coordinated between the Project Sponsor and TSA as part of the design process. TSA will not proceed towards finalizing a Facility Modification OTA until the 100% Design Phase has been successfully completed, bids are obtained and provided, a winning bid is chosen, and TSA conducts its own internal cost analysis.

TSA will retain 10% of invoiced amounts until the OTA scope is completed. If a Project Sponsor's system is required to repeat integrated site acceptance testing (ISAT), this may impact retainage.

Section C. Allowable, Allocable and Reasonable Costs

Cost share is dependent on the project category and hub type, and it will be stipulated in the OTA. Project costs may be eligible for inclusion in a Design or Facility Modification OTA if they:

1. Are essential to the checked baggage inspection system solution and not otherwise excluded;
2. Are allowable, in that they conform to the terms and conditions of the OTA to include all legal references listed in this policy and the OTA;
3. Are allocable, in that they directly attributed to only the TSA CBIS project (unless identified as an unallowable cost in section C.4) – a project cost must be chargeable to a TSA project objective necessary for the operation of the CBIS;
4. Are reasonable in their nature and amount, and do not exceed that which would be incurred by a prudent person in the conduct of competitive business. (See generally: Federal Acquisition Regulations Subpart 31.2, Contracts with Commercial Organizations, for further guidance.);
5. Are also considered allowable, allocable, and reasonable according to OMB Circular A-87, or OMB Circular A-122 depending on the Project Sponsor's business structure.

The Project Sponsor must also review project costs to ensure conflicts do not exist with any additional federal grants that the Project Sponsor has or intends to accept. In some instances, Federal Aviation Administration grants may preclude the reimbursement of TSA project costs, and vice versa. The Project Sponsor should consult their legal counsel and the appropriate federal agencies for guidance.

Typical Costs for TSA Checked Baggage Inspection System Projects

C.1 Allowable Design Costs

1. TSA will only reimburse design fees that can be directly apportioned to the TSA "allocable" portion of the CBIS project.
2. TSA will reimburse for reasonable project management costs associated with the design portion of a CBIS project.

3. Contingency may be considered for Design OTAs. Contingencies for Design OTAs shall be applied to the sum total of design, project management, and bid support costs.
4. TSA will reimburse for reasonable bid support costs associated with the construction portion of a CBIS project.

C.2 Allowable Construction Costs

1. Basic interior construction and fit out is considered an allocable cost and must be limited to areas directly supporting the baggage screening operation to include CBIS areas, including the CBRA areas and OSR room(s). Costs in excess of basic finishes are not allowable.

Interior construction is defined as:

- Interior wall construction as a result of space reconfiguration(s) to accommodate and support TSA screening operations
 - Installation of electrical and communications systems, including:
 - Circuit panels
 - Telephone or communication junctions
 - Transformers and other electrical components required to support TSA
 - Installation of heating ventilation and air conditioning (HVAC) of spaces to support EDS machine operation, the OSR room, the CBRA, and other areas that will be staffed by TSA field personnel. The exact extent of the HVAC cost that will be considered eligible for TSA reimbursement is assessed on a case-by-case basis.
 - Installation of uninterruptable power supply (UPS) to support EDS machine operation.
 - Sprinkler systems and alarms as required by local fire and safety codes
 - Insulation, drywall, acoustical ceiling tiles, and sound baffles associated specifically with the CBRA and/or OSR room noise attenuation
 - Interior construction in support of Occupational Safety and Health Administration (OSHA) requirements for spaces inhabited by Transportation Security Officers
 - Floor reinforcement in the CBIS, including CBRA and OSR areas to meet structural load requirements if applicable
2. Demolition and site preparation of the existing conditions to support EDS installation, CBRA and OSR construction.
 3. Basic lighting, fixtures, switching, and appurtenances in CBIS areas, including the CBRA, and the OSR room that meet current minimum National Electrical Code, International

Building Code, and OSHA requirements for lighting (lumen per square foot) for office space and to support allocable computers, conditioning units, printers, and other ancillary equipment. If allocable to the CBIS, OSR room, or CBRA, the costs for the following may be eligible for reimbursement:

- New power drops
 - Associated transformers
 - Electrical panels or subpanels
 - Communication and network wiring
 - Network and/or communications exchanges
4. Basic furnishings within the CBRA and OSR room only, such as adjustable height work stations, chairs, non-powered gravity rollers or other “no-lift” devices.
 5. Conveyor within the Secure Tracking Zone (STZ), generally defined as the portion of the BHS beginning at the pre-EDS automated tag reader (ATR) and ending at the downstream clear line(s). This is limited to conveyor from the ATR to the EDS shunts (if there is an upstream ATR), the EDS shunts to and from the EDS, the OSR line, the CBRA line, the reinsert line, and all diverters/merges required for baggage screening.
 6. The costs of design or construction of dual mainlines feeding the CBIS are allowable only if the rated throughput of the CBIS exceeds the capacity of a single mainline. The costs of dual mainlines for the purpose of redundancy, in systems where a single mainline has sufficient capacity to feed the CBIS at its rated throughput, are not allowable.
 7. ATRs are allowable by TSA if they are installed pre-EDS and used to support bag tracking in a security zone.
 8. Conveyor equipment allocability outside of the CBIS can be considered under the following conditions:
 - For an existing centralized system, in which the current configuration routes bags from multiple ticket counters into a single mainline and back out to multiple makeup units (see Figure 1), conveyor sections required to intercept bags on original delivery lines, deliver to CBIS, and return back to the original conveyance will be considered for reimbursement. The conveyance design shall align with the reasonableness expectations as identified in Section C. TSA will not reimburse for a host Baggage Sortation Message to a sort controller for the purpose of individual air carrier sort functions.
 - For an existing decentralized system, in which the current configuration routes bags from individual ticket counters to individual baggage makeup units (see Figure 2), conveyor sections required to intercept bags on original delivery lines and deliver to CBIS will be considered for reimbursement. TSA will reimburse the clear lines exiting CBIS up to and including the last clear conveyor merge conveyor (and receiving conveyor) within reasonable design expectations (to be reviewed and discussed during the design submissions). Baggage conveyance downstream of the

last clear conveyor merge back out to baggage makeup units is not an allocable cost.

- Existing systems that are not aligned with the above scenarios (existing systems that contain both centralized and decentralized BHS subsystems) will be evaluated on a case by case basis.

Figure 1: Diagram of Allowable BHS Equipment (Centralized Sortation)

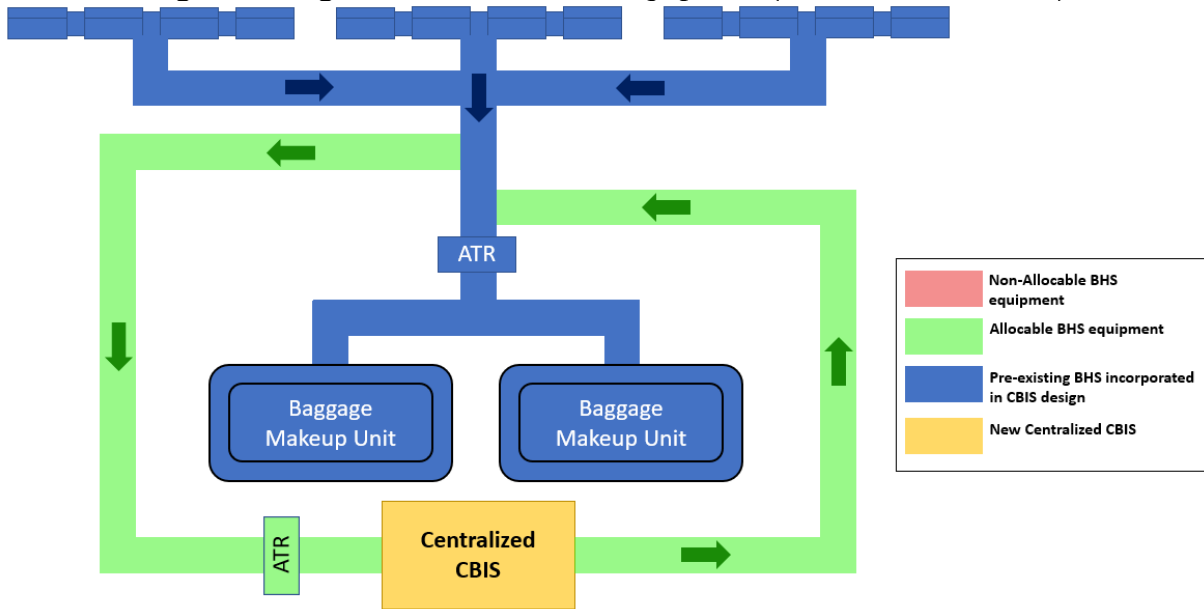
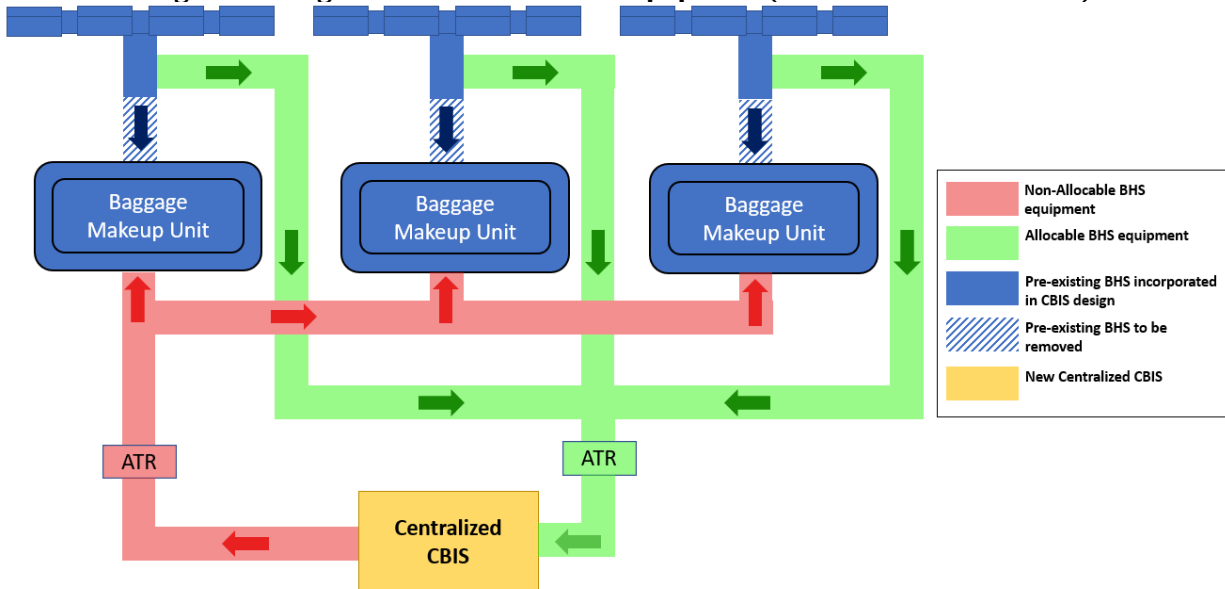


Figure 2: Diagram of Allowable BHS Equipment (Decentralized Sortation)



- Telephone, radio, intercom, airport-only cellular phones, or other voice communications may be considered if essential for TSA CBIS, including CBRA and OSR operations.

10. Closed Circuit Television at the following locations:

- The divert point going into the EDS shunt
- The EDS entrance
- The EDS exit
- The machine clear bag divert point
- The point where the OSR line merges into the mainline
- Last chance divert point
- OSR Room
- CBRA Room

11. BHS monitors in the OSR room and/or in the CBRA.

12. Programmable logic controllers (PLC) if the addition of an in-line screening system requires a modification and/or addition to current systems. TSA will only consider allowing for the programming to integrate and control the in-line screening portion of the BHS, and will only consider the costs of that portion of the controls necessary to support CBIS, OSR, and CBRA operations.

13. Replacement or modification of the existing CBIS necessary to support recapitalization of the EDS machines on a case-by-case basis within the TSA-designated areas.

14. Phasing costs identified and agreed to by TSA in the design review process to support EDS installation, CBRA and OSR construction.

15. Security Technology Integration Program (STIP) requirements. STIP provides for connectivity of security technology such as EDS, Explosive Trace Detection, and primary and secondary EDS workstations to the TSA network (see PGDS for general connectivity requirements; TSA will also provide any current STIP requirements documents to a Project Sponsor upon request).

C.3 Allowable Project Management, Construction Management, and Contingency Costs

1. The following fees are considered to be allowable costs:

- Insurance
- Home office overhead
- Profit
- Sales tax
- Design w/ Construction Administration
- Project Management
- Construction Management
- Design Contingency
- Construction Contingency (Facility Modification OTA Only)

TSA will only reimburse such costs that can be directly apportioned to the TSA “allocable” portion of the CBIS project. Specific justification for fees must be provided and approved at the time of negotiation prior to the OTA being signed.

2. The inclusion of construction contingency funds for allocable items is only allowable for projects with Facility Modification OTAs. Construction contingencies are not expected to exceed 5% of the total projected construction budget unless the total construction budget is low or there are other extenuating circumstances.
3. In order to invoice TSA for any of the contingency funds, a change request must be submitted to TSA outlining the change in condition that requires the additional funding and supplying the necessary supporting documentation, including modified plans and specifications for the change. Further, Project Sponsor should submit a cost estimate, meeting all requirements of this document, with the change request justifying the change in cost.
 - Change Requests are defined as requests for the utilization of contingency funds that do not add costs or changes to the scope of the OTA. Change requests shall not be considered authorization to exceed TSA's Reimbursement Limit. Any change requests shall be submitted by the Project Sponsor to the TSA COR prior to any work starting. Once the COR has been given advance notice of the impact the change request has on the Project, if agreed to by TSA, the TSA COR will provide written approval to the Project Sponsor to proceed with the work identified in the Change Request. TSA will not reimburse the Project Sponsor for any cost incurred for change request work that was not pre-approved by TSA.
 - If the change requires a modification of the OTA, this constitutes a change order. Change Orders are defined as work that is added to or removed post OTA award that consequentially adds cost or changes the scope of the OTA. Change orders shall not be considered authorization to exceed TSA's Reimbursement Limit. Any changes to the authorized amount shall be submitted by the Project Sponsor to the TSA Contracting Officer Representative (COR) and TSA Contracting Officer (CO) prior to any work starting. Once the COR and CO have been given advance notice of the impact the Change Order has on the total cost of the Project, if agreed to by TSA, the TSA CO will provide written approval to the Project Sponsor to proceed with the work identified in the Change Order. TSA will not reimburse the Project Sponsor for any cost incurred for change order work that was not pre-approved by TSA.

C.4 Unallowable Costs

The following list presents examples of items which costs are considered unallowable for reimbursement under an OTA agreement with TSA. This list does not represent a complete list of unallowable items. TSA's requirements for the design of CBIS are presented in the PGDS.

1. Design and construction costs for TSA-leased spaces.
2. Construction costs for centralized BHS control rooms.

3. Design or construction of “bricks and mortar”, which is defined as new construction that is not fit-out of TSA specific rooms (such as any new physical structure built to house the CBIS, CBRA, and/or OSR areas).
4. Design or construction of new utility substations or distribution centers (examples including but not limited to electrical switchgears and building water main pumps).
5. Costs for extended warranties.
6. Costs for BHS operations and maintenance.
7. Costs incurred outside of the OTA period of performance.
8. BHS Spare parts and storage areas for BHS spare parts.
9. Replacement of PLC components and PLC programming. See Section C.2.12 above for more details on PLC eligibility.
10. Laptop computers used for maintenance of the BHS.
11. BHS components outside of the CBIS area (including, but not limited to):
 - a. Baggage reconciliation systems (carousels or sortation systems).
 - b. Baggage System Management (BSM) data providers and/or BSM systems.
 - c. Manual encoding systems, with the exception of ICS systems where the manual encode is used.
 - d. Replacements of ticket counter conveyors and sortation area conveyors.
 - e. Input mainline conveyors upstream of the Secure Tracking Zone (STZ) unless identified otherwise in section C.2.
 - f. Conveyors downstream of the STZ unless identified otherwise in section C.2.
 - g. Replacement of inbound and outbound sortation conveyors.
12. Retrofit of an existing CBIS as a result of airline mergers or relocations within an airport unless such construction is proven to be cost-beneficial to TSA, as determined by TSA’s cost analysis. TSA does not support allocation of BHS system costs borne by airlines or airports outside of the OTA process
13. Mainlines in excess of the capacity needed to feed the CBIS at its rated throughput.
14. Automatic recirculation loops (not including the automatic reinsertion lines in the CBRA), either pre-EDS screening or post-EDS screening.
15. Dynamic simulation modeling.

16. Additional ISAT beyond the initial test.

a. The Project Sponsor's cost for additional ISAT will be borne by the Project Sponsor and will not be reimbursed by TSA.

b. TSA's cost for additional ISAT will be deducted from the OTA retainage.

17. Re-design work the airport elects to do after TSA approves a design.

18. Costs incurred by the airport or its contractors or agents to perform work not in compliance with TSA requirements as stated in the OTA.

19. Airport profit or the general costs of government.

20. Repair or replacement of any equipment not identified as being "TSA Maintained" in Table 2 below.

Table 2: TSA Procurement and Maintenance Responsibility Matrix

Category	Equipment Type	TSA Procured	TSA Maintained
Screening Equipment	EDS, ETD	Yes	Yes
Ancillary Equipment	SVS, PVS, MCS, UPS, Network Servers	Yes	Yes
Furniture	OSR Chairs	Yes	Yes

Appendix. Revision Summary

Version 5.0

LOCATION	COMMENT (Bold font indicates notable changes)
Section A	Updated URL link for PGDS
Section B	- Revised section title to “Funding Application and CBIS Project Types Eligibility” - Removed reference of the FSD acquiring a ReMAG prior to submitting the application form - Added Table 1 to provide an overview of project types and funding eligibility B.1 - Revised language to define a New In-line system and added metrics to identify expectations for a full in-line system. - B.2 - Added language to Recapitalization that “TSA currently reimburses airports 100% of the total project costs (design and construction) for the limited scope of straight recapitalization. “ - B.2 - Removed the word “generally” such that the language reads “Recapitalization projects are eligible for TSA funding” - B.3 - Revised language to Optimization to define that eligibility for TSA funding and added the list of requirements to be eligible for funding. - B.4 - Removed the word “generally” such that the language reads “PGDS Upgrade projects are eligible for TSA funding”. - B.5 - Revised “Expansion” to “Growth” and added language “to account for demand beyond existing system capacity”. - B.5 - Removed the word “generally” such that the language under Growth reads “These projects are not eligible for TSA funding” - Added language “Any project costs incurred by the Project Sponsor prior to receiving a fully executed OTA from TSA are ineligible for reimbursement”. - Added language “As every project is unique, the Project Sponsor must be cognizant of the terms and conditions associated with their respective OTA in order to ensure that potential costs meet the requirements for reimbursement” - Revised the language “make a final determination regarding funding” to “award” - Added language that for a facility modification OTA, the bid information is to be provided “in CWE format” - Revised language from “a certain percentage” to “10%” with regards to retainage - Revised language from “certain project milestones are completed” to “the OTA scope is completed” - Removed language “The OTA will provide specific milestones and the percentages to be retained” related to retainage
Section C - Intro	- Added language to note project costs may be eligible for inclusion in both a Design or Facility Modification OTA C.3 - Added language “(unless identified as an unallowable cost in section C.4)” related to allocable costs
Section C.1	C12.3 – Moved language from section C.3 to C.1 regarding Design OTA Contingencies
Section C.2	C.2.7 - Removed language identifying ATRs as allowable if they are installed post CBIS C.2.8 - Revised language describing allocable considerations for both an existing centralized system and an existing decentralized system, further defining the equipment that TSA will consider allocable for funding purposes.

	• C.2.8 - Added language “systems that are not aligned with the above scenarios (existing systems that contain both centralized and decentralized BHS subsystems) will be evaluated on a case by case basis.” • C.2.8 - Revised Figures 1 and 2 to reflect allowable BHS equipment instead of allowable ATRs. • C.2.13 - Revised language from “relocation, and/or upgrade” to “or modification” with regards to support recapitalization of EDS machines
Section C.3	• C.3.1 – Added language “(Facility Modification OTA Only)” with regards to construction contingency • C.3.3 – Added language directly from the OTA agreement to define a change order and change request
Section C.4	• C.4.3 – Revised language from “refers to” to “is defined as new construction that is not fit-out of TSA specific rooms (such as any new physical structure built to house the CBIS, CBRA, and/or OSR areas)” • C.4.4 – Added new bullet point with language “Design or construction of new utility substations or distribution centers (examples including but not limited to electrical switchgears and building water main pumps).” • C.4.6 – Revised “CBIS” to “BHS” • C.4.8 – Revised language to refer specifically to “BHS Spare Parts” • C.4.11.c – Removed the language “post ATR and pre-EDS only” • C.4.11.e – Revised “Inbound” to “Input” and added language “unless identified otherwise in Section C.2”