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Development of a Methodology to Determine Risk of Counterfeit Use

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ABSTRACT

Counterfeit components have become a multi-million dollar, yet undesirable, part of the electronics industry. The profitability of the counterfeit industry rests in large part on its ability to recognize supply constraints and quickly respond, effectively taking advantage of a complex and vulnerable supply chain. Factors such as product obsolescence, long life cycles, economic downturn and recovery, local disruptions in manufacturing due to natural disasters, and lack of proper IP legislation all represent opportunities for the counterfeit component industry to flourish. Electronic counterfeits affect every segment of the market, including consumer goods, networking and communications, medical, automotive, and aerospace and defense. In manufacturing, the use of undetected counterfeits can lead to increased scrap rates, early field failures, and increased rework rates; while this presents a major problem impacting profitability, the use of counterfeit components in high-reliability applications can have far more serious consequences with severe or lethal outcomes.

The independent distributor level has typically been seen as the weak link in the supply chain where counterfeits are most likely to be introduced. With the emergence of new legislation and through the efforts of different industry entities, new standards and guidelines are now available for suppliers to establish and maintain product traceability and to establish receiving inspection and detection protocols. There is no substitute for a healthy supply chain, and distributors play an essential role in the dynamics of the system. At the same time, there is an increased awareness of the need for proper management of electronic waste. Regardless of the nature of the counterfeits, whether cloned, skimmed, or re-branded, counterfeits are dangerous and too expensive to be ignored.

The work presented here by the iNEMI Counterfeit Components Project takes a comprehensive view of the problem by surveying the possible points of entry in the supply chain and assessing the impact of counterfeit components on the industry at various points of use. We then propose a risk assessment calculator that can be used to quantify the risks of procuring counterfeit parts. This calculator is aimed at all segments of the supply chain and will be of interest to component manufacturers, product designers, distributors, loss estimators, industry groups and end users.

INTRODUCTION

The existence of counterfeit electronic components, materials and assemblies (hereafter referred to simply as counterfeit components) is not a new phenomenon^{1, 2}. However, global trade of counterfeit components has recently increased markedly. There are four distinct categories of electronic products in which counterfeit components are most frequently found:

- · Manufacturing shortfall and product shortages
- High-value products
- Obsolete, discontinued, and legacy devices
- Field installable options or upgrades

¹ Bill Crowley, "Automated Counterfeit Electronic Component Warning System and Counterfeit Examples", SMTA/CALCE Counterfeit Symposium, June 2012

² Philip DiVita et al, "Avoiding Counterfeit Parts When Addressing Component Obsolescence", SMTA/CALCE Counterfeit Symposium, June 2012

The Semiconductor Industries Association Anti-Counterfeiting Task Force³ has defined counterfeiting as:

- Substitution or the use of unauthorized copies of a device or product
- The use of inferior materials or a modification of performance without notice
- The sale of a substandard component or product in place of an original OCM device or OEM product

The following definition was adopted from "Defense Industrial Base Assessment: Counterfeit Electronics"; US Dept of Commerce – Office of Technology Evaluation; January 2010.⁴

... a counterfeit is an electronic part that is not genuine because it:

- Is an unauthorized copy
- · Does not conform to original manufacturer's design, model, and/or performance standards
- Is not produced by the original manufacturer or is produced by unauthorized contractors
- · Is an off-specification, defective, or used product sold as "new" or working
- Has incorrect or false markings and/or documentation

COUNTERFEIT DEVICE CATEGORIES

Counterfeit components can be produced, sourced, and distributed in many different ways. The identity of these nonstandard parts is usually very well concealed in the present supply chain. Types of counterfeit components can be divided into the following categories.

Cloning

The complete manufacture of a reverse engineered device to have the same form, fit, and function as the original. Devices are produced on low end equipment and will not meet the original reliability requirements. Devices are branded and sold as Original Component Manufacturer (OCM) parts.

Product "skimming", subcontractors, or second source suppliers

Manufacturers may over-produce or claim a lower production yield. These extra devices can then be introduced into the market through the broker chains.

Disposal of scrap and rejects

Devices rejected during manufacturing are sent to recyclers to salvage precious metals. Recyclers may certify destruction without scrapping the devices and subsequently sell them back into the supply chain.

Devices used as qualification samples

OCMs and OEMs use large quantities of devices to qualify/certify form, fit and function of devices. Accelerated life testing is used to evaluate the functionality and reliability at end of life. Pilfered devices stored for future evaluations can be sold into the supply chain as virgin product. When scrapped, many units may still function making this material a prime target for diversion frauds.

Reclamation and reuse of components

Large quantities of electronic equipment containing working devices are scrapped. Valuable components can be recovered for reuse; however, uncontrolled removal can damage and/or compromise the original electrical performance, reliability and operational life. These compromised parts can then be sold into the supply chain.

Re-branding

Some products have high performance requirements and must undergo more extensive testing during manufacture (for example, devices that must operate at extreme temperature ranges, such as automotive, aerospace and military applications, or high speed versions of memory modules and processors). Devices with lower specifications that were never tested to the more stringent specifications are acquired at a lower cost, re-marked, and resold at the higher price.

False claims of conformity to industry certifications (e.g., RoHS)

Paperwork is provided stating devices are compliant and old (non-compliant) devices are substituted.

Devices containing embedded malicious malware

Programmable devices are reprogrammed to cause latent damage to products. This problem is most critical in the Aerospace, Defense, and Medical sectors in which counterfeits could render systems inoperative, compromising the safety and security of users. The Office and Large Business Systems sector, in particular, the FSI (financial services institutions) and pharmaceuticals, own a lot of embedded servers supporting mission critical activities that could pose serious economic and health risks. The latter may have greater implications and impact on a global crisis via malware.

³ <u>http://www.semiconductors.org</u>

⁴ <u>http://www.bis.doc.gov/defenseindustrialbaseprograms/osies/defmarketresearchrpts/final_counterfeit_electronics_report.pdf</u>

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SITUATION ANALYSIS

iNEMI segregates the electronics industry into the following product sectors. (See Table 1 for details of the sectors and typical product service times.).

- Aerospace and Defense
- Automotive
- Medical
- High-End Systems (including data communication, networking, voice communication and large business systems)
- Office Systems
- Consumer and Portable

Industry	Sectors	Product Service Time
Aerospace & Defense	Avionics (Civil)	10 to 20 years
	Avionics (Military)	10 to 30 years
Automotive	Cars and Trucks	10 to 15 years (warranty)
Medical	External Equipment	5 to 10 years
	Implanted Devices	7 years
High-End Systems	Infrastructure Equipment	10 to 30 years
	Data Center Equipment	7 to 10 years
	High-End Servers	7 to 10 years
	Industrial Controls	7 to 15 years
Office Systems	Desktop Computers	24 to 60 months
Consumer & Portable	Appliances	7 to 15 years
	Cell Phones	18 to 36 months
	Laptop Computers	24 to 36 months

All of these product sectors are at risk for introduction of counterfeit components; however, each has its own set of requirements for commonly used components. It is not clear that there is a "one size fits all" solution to the counterfeit components problem due to the variations in requirements among sectors.

Aerospace and Defense

These products require flawless performance on demand, in a multitude of rugged environments, and must sustain this performance over long periods of continuous service. Due to the long service life, systems rely on legacy devices to maintain and expand existing systems. Defense and aerospace systems require extensive testing to meet performance requirements and designs are modified (ruggedized) to meet the thermal, vibration, humidity, salt, fog, and other environmental and reliability requirements associated with DoD platforms. Both need to have a proven supply chain to ensure devices meet security requirements.

Automotive Electronics

These applications involve temperature extremes that require improved process controls on the devices. Controllers communicate with sensors and drive relays, injectors, motors, lamps and solenoids. The engine controller is currently the most complex product for harsh-environment automotive electronics. There is also the need for large traces required by high current and power circuitry. Long-life, high-reliability devices are needed as product warranties extend to as long as 10 years.

Medical Products

These include large infrastructure equipment, small stationary equipment, and implantable devices. High reliability is required for life critical applications such as electronic implants, medical imaging systems, and resuscitation systems. Many of the large systems use legacy devices and need a reliable supply of replacement parts.

High-End Systems

These include three major categories: high-performance computing, data centers and communications. The networking and computing hardware has been gaining more common components as communications becomes an integral part of enterprise computing and as technology advancements enable tighter integration of communication and computing technologies in commercial business systems. The products represented include mainframe and high-performance computers, the data centers and server farms that house the computers, and communications equipment such as switches and routers and enterprise service provider equipment.

Office Systems

These include desktop PCs, and other general office equipment (printers, copiers). This sector is cost sensitive and requires the latest cost effective technologies. The main vulnerabilities relative to counterfeit components are cloning, product "skimming," reclamation, and rebranding.

Consumer and Portable

These products are increasing in complexity; however the main drivers are the reduction in cost and increase in functionality while looking at ways of continuously shrinking the system footprint. The sector has the shortest product life, and the main vulnerabilities are similar to the office and large business systems, i.e., cloning, product "skimming", reclamation, and rebranding.

POSSIBLE STRATEGIES

Dealing with the different counterfeit device categories will require the use of a variety of strategies. There are different strategies for each category that are most likely to be successful.

Cloning

Legacy and high-value components are suspected to be the most dominant. Device serialization may prove to have a beneficial impact on this category of counterfeits.

Product "skimming", subcontractors, or second source suppliers

Place better controls on the documentation with violators identified and prevented from conducting further business.

Disposal of scrap and rejects

Establish better controls on scrap processing and handling. Systems designed to more effectively monitor and audit the waste stream may be needed.

Devices used as qualification samples

This form of counterfeit may not be prevalent enough to warrant developing solutions; however, this needs to be verified by an investigation into the extent of this source of counterfeit components.

Reclamation and reuse of components

Some OCMs and OEMs have legitimate operations to reclaim and reuse components using strict procedures to ensure that quality and reliability have not been compromised. Verification procedures for legitimate devices need to be established.

Re-branding

Inspection, inspection, inspection (mechanical, electrical, etc.) as well as lot testing.

False claims of conformity to industry certifications (e.g., RoHS)

Incoming inspection should be required, since counterfeiters are providing false documentation. Traceability and serialization may help to reduce this category of counterfeit devices.

Devices containing embedded malicious malware

This problem is most critical in the aerospace and defense and medical sectors in which counterfeits could render systems inoperative, compromising the safety and security of users. The use of all possible approaches to counterfeit reduction is warranted for this sector.

INITIAL WORK

The first phase of iNEMI's Counterfeit Components Project is broken into several high-level tasks. The first three tasks (on which this paper is based) were:

Task 1: Identify and summarize any related research or development within the industry and academic communities.

Task 2: Review and tabulate successes that have worked in the past (Best Known Methods/Best Known Practices).

Task 3: Develop a methodology to evaluate or assess the risk of counterfeit use.

In addition to the tasks specifically identified in the Project Statement of Work, the team also:

- Focused on those attributes that are of most value to the supply chain and participating project members, and that are applicable to multiple spaces across the supply chain.
- Identified and developed methodologies with associated metrics to assess the overall extent of the counterfeit
 problem in the electronics industry. The outputs will enable iNEMI members to assess the risk of counterfeit
 use in their respective industries, the risk of untrusted sources of supply in that industry and understand the
 total cost of ownership associated with those risks.
 - The methodologies and strategies apply to all phases of the manufacturing cycle and supply chain. Not only do counterfeit components have a serious impact on the OCM, but impact all downstream users from the legitimate component brokers to the OEMs that integrate these components to the end-user.
 - Metrics to assess the overall extent of the problem and anti-counterfeiting will be identified for all phases.

The team began by identifying the key sectors of the electronics supply chain (Figure 1).

- Wafer Manufacturers
- Chip Manufacturers
- Board Manufacturers
- System Manufacturers
- After Market Sales and Refurb Support
- Disposal/Recycle

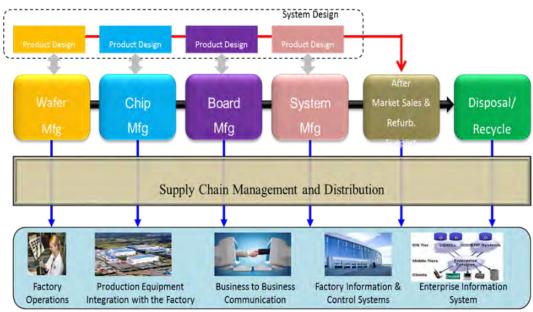
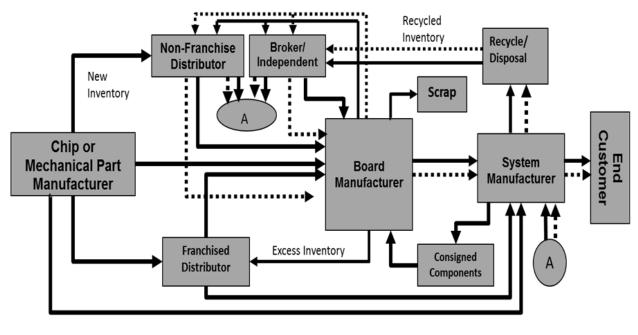


Figure 1: Diagram of Key Sectors of the Electronic Manufacturing Workflow⁵



Authentic Material

Counterfeit Material

Figure 2: Cluster map for board manufacturer shows potential flows of authentic and counterfeit materials

The electronics supply chain was then broken into a series of manufacturing "cluster maps" to help visualize how materials, parts, assemblies, and waste move, and identify the key players in each manufacturing sector.

The Board Manufacturer Cluster diagram (Figure 2) highlights two principal flows between the major Electronic Manufacturing Workflow blocks: the "*authentic*" and "*counterfeit*" material flow paths. The authentic material flow pathways indicate peer-to-peer connections where the board manufacturer has established strong agreements and has policies in place to prevent corruption of their supply stream. These measures generally provide a high confidence in the supply chain and feature traceability of the pedigree of electronic components.

The counterfeit material flow pathways highlight potential opportunities for breaching into the supply chain and corrupting traceability and pedigree of the electronic components. The risk of infiltration using one of these pathways increases when product shortages occur. Risks can also increase as new participants enter the networks to service growing demand. For example, as green manufacturing increases demand for recycling, new players rushing to capture market share may overlook security protocols. Also consider how criminals are well versed at pretending to be new participants.

With the completion of the cluster maps for the electronics supply chain, the team was able to begin work on the task of developing a methodology for assessing the risk of counterfeit use.

TASK 3- DEVELOPING A RISK ASSESSMENT CALCULATOR FOR COUNTERFEIT USE

1. Premise of the Spreadsheet / Assumptions

Examining the cluster maps for the different segments of the electronics supply chain, the team decided that the risk of counterfeit use was based on four key elements:

- The profile of the product in question
- The inputs or characteristics of the supplier and supply line
- The processes used on the product to deter counterfeit use
- The outputs or channel characteristics

The team's goal was to provide a quantitative methodology of risk assessment built on these four key elements that any company could use to rate their product.

2. Structure of the Spreadsheet / Rating Scale - See Appendix 1 for sample of calculator

2.1) Product Profile

The profile of the product in terms of demand for that product and where it is on the life cycle are key determinants in the risk of counterfeit use. The higher the demand for a product, the more attractive it becomes for counterfeiting. If a product is in high demand and also the original supply is near end of life, then the product profile risk of counterfeit is highest.

2.2) Inputs

The profile of the supplier and the history of that supplier in terms of counterfeit incidents, the clarity of the supply line, and the anti-counterfeit controls used by the supplier are key factors in determining the risk of counterfeit use. For example the input risk is highest where the supplier is a broker with no controls who has previously supplied confirmed counterfeit product and cannot confirm the origin of the product in question. Conversely, the input risk is lowest when the product is coming directly from the OCM, there are strong counterfeit mitigation procedures in place, and there is no known history of counterfeit supply.

2.3) Process

The processes required to produce the product, the ease of counterfeit detection of that product and the counterfeit controls used in the original product are also key factors in determining the risk of counterfeit use. Where a product requires a large capital investment, is easy to authenticate and uses a high level of counterfeit controls, the process risk of counterfeit use is low. On the other hand, where there is little or no investment required to make the product, validation is difficult, and there are no special counterfeit controls in place, the process risk of counterfeit use is highest.

2.4) Outputs

The key factors to consider for output risk are the sales channel used, the handling of excess inventory, prototypes, reworks and scrap, and the customer profile. The outputs risk is at its highest when the sales channel is unknown; when there is no control or traceability on excess inventory, prototypes, reworks or scrap; and where the end customer is unknown. In contrast, where the end customer is well known, the sales channel is well defined and the excess / prototypes / reworks and scrap are well controlled, the output risk is lowest.

3) Examples of Calculation

Rating each of the four key risk elements above, the methodology gives an overall score for the product in question. Flash is a well-known target for counterfeiters, making it a good test of the methods developed here. Based on the values used by the team for each of the factors, the overall rating is very high, indicating that our methodology estimates the risk of counterfeit use as very high. In contrast, the rating for a typical ASIC device is very low and, therefore, the risk of counterfeit use is low. These results serve to validate this method for risk assessment.

At this stage, the methodology is useful for comparative purposes only. The team would like to industry to test the methodology and provide feedback to the team. The wide range of data collected would enable the team to provide guidelines in the form of levels of risk of counterfeit use. For example, an overall rating of 1 ~ 500 means the risk of counterfeit use is very low and no additional actions are recommended. A rating of 5000 ~ 10,000 means the risk is very high and immediate action needs to be taken in the high-risk areas.

When materials are purchased through the distribution channel, there are ways to minimize exposure to suspect, fraudulent, or counterfeit parts passing undetected through the distributor to you. SAE International Standard AS5553A⁶ identifies a series of controls and certifications to ensure detection and prevention of counterfeit components. You can select a distributor that has been audited by a third-party certification body and is compliant with:

- a) AS6081 (Counterfeit Electronics Parts; Avoidance Protocol, Distributors)⁷,
- b) AS6301 (AS6081 Verification Criteria) and
- c) ISO / IEC 17025 certified for counterfeit testing

For distributors to be compliant with these standards, all materials must be inspected, tested, and certified as noncounterfeit materials before they can resell the parts. This level of testing will add additional cost to the materials, but the risk will be significantly mitigated. The level of testing and controls required from the Distributor selected can be balanced in terms of the cost vs. risk avoidance benefit for your business needs.

For suppliers outside the authorized distribution channel, there are qualitative means to better assure end customers that your organization is providing genuine materials. Chief among these is to always know your source of supply, which can be achieved by tracking and recording problems to provide a historical record of past transactions. This is particularly important for high-volume suppliers.

In addition, understanding parts and associated package types is a must. This affords the purchaser the ability to recognize the most blatant attempts at counterfeiting, and this may lead to a limiting of drop shipping parts from their original source to an end customer with no handling by the intermediary party. There is an associated cost impact to inspect parts; however, it may be a necessary cost of doing business, especially when there are unknown providers in the chain.

TASK 4- DEVELOPING A RISK ASSESSMENT CALCULATOR FOR THE AGGREGATED RISK OF UNTRUSTED SOURCES OF SUPPLY

1. Premise of the Spreadsheet / Assumptions

⁶ <u>http://standards.sae.org/as5553/</u>

⁷ Anne Poncheri, "AS6081-Fraudulent/Counterfeit Electonic Parts; Avoidance, Detection, Mitigation and Disposition-Distributor", SMTA/CALCE Counterfeit Symposium, June 2012

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The team chose the following key elements as indicators for risk of suppliers:

- Memberships, accreditations
- · Mitigation and controls by the supplier
- Company characteristics

Based on objective information grouped in these three key elements, the calculator produces relative ratings that are expected to be correlated to the risk of receiving counterfeits from untrusted sources. The ratings can support a decision whether to purchase from a particular source or which of several suppliers to choose. Only non-authorized suppliers (brokers, independent distributors) are considered "untrusted sources," to which the calculator is applicable. The calculator is not intended to rate authorized distributors.

2. Structure of the Spreadsheet / Rating Scale - See Appendix 2 for sample of calculator

2.1) Memberships and accreditations

Reputable and accountable brokers who are safer to do business with will seek accreditation to industry standards and operate to best practices. The memberships chosen are IDEA (Independent Distributors of Electronics Association) and GIDEP (Government-Industry Data Exchange Program). It is straightforward to add more memberships in a future version of the calculator. When comparing suppliers, users need to be aware that only North American companies can join GIDEP. The team identified the ISO 9000 series, SEMI T20, AS 6081 and the upcoming AS 6171 as the most relevant standards. AS 6171 will become a differentiator after its release and after some companies have been accredited.

2.2) Mitigation and controls

Factors for quantifying mitigation and controls include: inspection by or on behalf of the supplier and how detailed the inspection is; the environmental conditions at the supplier for handling, shipping, storage; what type of insurance or warranty the supplier provides against counterfeits; the policy in the case that a counterfeit occurs; and the policy in the case where parts are suspect, but no actual proof of counterfeit.

2.3) Company characteristics

Scores for company characteristics are based on he number of employees, the number of locations in different countries, the business scale as measured by annual revenue, the history of past occurrence of providing suspects or counterfeits, and the commodity expertise of the supplier's staff.

3) Examples of Calculation

Rating each of the three key risk elements above, the methodology gives an overall score for the supplier in question in the range of 9 - 8249. After entering the complete input information, the total rating result is, for example, 103 for supplier A and 8249 for supplier B. Choose supplier A, not B. Due to the extremely high rating for supplier B, consider disqualifying supplier B from any purchases until the company improves.

TASK 5- DEVELOPING A CALCULATOR TO ESTIMATE THE OVERALL COUNTEREFIT COSTS & LOSSES

1. Premise of the Spreadsheet / Assumptions

A major challenge facing most companies is to estimate how big the counterfeit problem is in financial terms. The purpose of this calculator is to provide an easy-to-use method to estimate the costs and losses associated with counterfeit product. It provides the user with three separate assessments: the Counterfeit Loss Estimate by product or product group, the Counterfeit Loss by geography or market, and the Total Counterfeit Costs and Losses estimate. The three assessments can be run independently to get an estimate for the losses by product, for example, or combined to give a full picture of the counterfeit losses by product and market and an overall estimate of the cost of counterfeit to the company.

The counterfeit loss estimate is based on the output from the risk assessment calculator in Task 3, where the risk of counterfeit is classified as low, medium or high. The losses by geography or market are generated using the Corruption Control Index supplied by the World Bank⁸. For the sake of simplicity and ease of use, the calculators use a minimum of information to estimate the cost of counterfeit and all the information should be readily available in most companies.

- 2. Structure of the Spreadsheet / Rating Scale
- 2.1) Total Counterfeit Loss Estimation (Figure 3)
- a) Products List or input all the products or product groups that you want to assess
- b) Risk of Counterfeit Input the rating from Task 3 as low, medium or high

c) Industry Counterfeit estimate – Input the data about the level or rate of counterfeit for the product in question or, alternatively, use an industry estimate for that product from one of the industry groups such as SIA etc.

d) Input the estimate or planned worldwide revenue for each product

Based on the inputs above, the calculator will provide an estimate of the counterfeit losses for each product listed and an overall total for all products.

⁸ http://info.worldbank.org/governance/wgi/index.aspx#reports

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Products	Risk of Counterfeit	Industry Counterfeit Estimate	W/W Product Revenue US\$ (K)	Estimted Losses US\$ (K)
Product 1	Medium	5%	200	6.67
Product 2	High	3%	50	1.50
Product 3	Low	3%	100	1.00
Product 4	Medium	3%	250	5.00
Product 5	Medium	3%	100	2.00
Product 6	High	3%	150	4.50
	Total		850.00	20.67

Total Counterfeit Loss Estimation

Figure 3. Total Counterfeit Loss Estimation by product

2.2) Counterfeit Loss by geography (Figure 4)

a) Input all the countries that you are selling or plan to sell each product

b) Input the estimated or planned revenue for that country

c) Input the Corruption Control Index generated by the World Bank for each country listed (Figure 5 is an example of this index for several countries). The team believes this is the simplest and most effective direct indicator for counterfeit activity by country.

Based on the inputs above, the calculator will provide an estimate of the counterfeit losses by country for each product.

INE				Return to	Instruction
		t Loss Estimation	by Geogra	aphy or Market	
Products		Country or Region	Revenue	Corruption Control Index	Losses by Country
	US\$ (K)		US\$ (K)		US\$ (K)
Product 1	\$6.67	China	60	30.3	3.63
		India	30	35.1	1.69
		US	100	85.3	1.28
		Germany	10	92.9	0.06
		Total	200		
Product 2	\$1.50	China	20	30.3	1.14
Troduct	01.00	US	30	85.3	0.36
		Total	50		

Figure 4. Counterfeit Loss Estimations by Geography or Market

HOME AC	CESS GOVERNANCE IND	ICATORS	Ъ	DOCUME	NTATION SFAQ	A LANGE	LINE IS
ndicators for One Co	untry One Indicato	or for Sel	ect	ed Cour	tries Country D	Data Reports World	d Map
ect Indicator	Chart		Tab	le	Мар		Download Table.xls Show Print Version
ect Comparator	Statistical Table:	Control	of C	orrupti	on, Comparison	across selected co	untries
ck to the countries	Country	Sour	ces	Year	Percentile Rank (0-100)	Governance Score (-2.5 to +2.5)	Standard Error
	DENMARK	8	•	2011	100.0	+2.42	0.18
	GERMANY	9		2011	92.9	+1.68	0.18
	RUSSIAN	13	۲	2011	13.3	-1.09	0.13
	SWEDEN	7		2011	99.1	+2.22	0.18
	90th-100t	apse All h.Percenti Percentifi			50th-75th Percentile 25th-50th Percentile		
	Analytical Issues Note: The Worldwide G governance provided by developing countries. Th organizations, internatio	ovemance a large nu hese data a onal organi:	Indic mber are ga zation	ators (WG of enterp athered fri ns, and pr	I) are a research datas rise, citizen and expert om a number of survey ivate sector fims. The	Governance Indicators: M et summarizing the views survey respondents in ini institutes, think tanks, nor WGI do not reflect the offi WGI are not used by the 1	on the quality of dustrial and 1-governmental cial views of the

Figure 5. Corruption Control Index Example from the World Bank

2.3) Total Counterfeit Costs (Figure 6)

This calculator attempts to pull together the total picture in terms of counterfeit costs and losses experienced by a company. The revenue loss is estimated based on total revenue and the counterfeit rate. The other inputs such as warranty costs, service costs ... should be readily available. A brief description of them is as follows:

- Warranty Costs All warranty repair and replacement costs
- Service / Repair Costs All parts and labor involved in the service and repair activity
- · Monitoring Costs Includes test buys, data collection, validation service... costs incurred
- · Prevention Costs Includes education, travel, conferences, additional channel controls & supports
- Product Protection Costs Extra silicon, circuitry, hardware, software, firmware required to protect the product from counterfeit activity
- Litigation / Enforcement Costs Costs of pursuing cases in court, legal follow-up etc.
- Liability Costs / Consequential Damage Costs due to liability claims
- Brand Damage Estimate of the damage caused to brand value by counterfeit activity. The damage estimate
 can be based on percentage of customers lost, sales lost or other such negative outcome due to counterfeit
 activity.

		Retu	irn to Instruc	tions	
NEMI				Company (Confidentia
Total Counterfeit (Cost & Los	ses Es	timate	o o mpany a	
				€ (K)	
Estimated Counterfeit Rate	1.00%				
Revenue Impacted (1)	1,500	€ (K)			
- Revenue Loss			x CF Rate	\$15.00	€ (K)
Warranty Costs (2)	20.00	€ (K)	x CF Rate	\$0.20	€ (K)
Service / Repair Costs (3)	15.00	€ (K)	x CF Rate	\$0.15	€ (K)
Monitoring Costs (4)	0.050	€ (K)			
Prevention Costs (5)	0.010	€ (K)			
Product Protection Costs (6)	0.100	€ (K)			
Litigation / Enforcement Costs (7)	0.050	€ (K)			
Liability Costs / Consequential Damages (8)	0.010	€ (K)			
Brand Damage				\$20.00	€ (K)
- Brand Value	20,000	€ (K)	-		
- Brand Damage Estimate % (9)	0.10%				
Total Cost / Losses				\$35.57	€ (K)

Figure 6. Total Counterfeit Costs & Losses Estimate

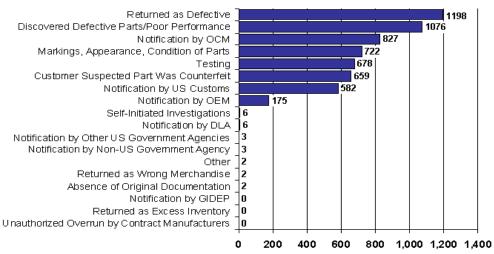
3) Examples of Calculation

The examples above show the simplicity of the calculators and how they work. In Assessment 1, there are six products listed. The counterfeit risk varies from low to high, the industry counterfeit estimate is either 3% or 5%, the revenue by product is shown in \$k, and the corresponding counterfeit loss is estimated. Product 1 has worldwide revenue of \$200k and, based on a medium risk of counterfeit and an industry counterfeit estimate of 5%, the estimated loss for this product is \$6.67k. This calculator enables a company to prioritize the products most at risk from counterfeit and decide where to allocate resources and mitigation efforts.

In Assessment 2, for each of the products listed in Assessment 1, when we look at the revenue and counterfeit risk by country, the calculator provides an assessment by country and enables a company to prioritize where to focus their risk mitigation efforts. In the example provided for Product 1, China has the highest estimated loss by country at \$3.63k and so the channel team for China (for example) may need to look at improved product protection and authorized channel control in China.

In Assessment 3, using all of the various inputs such as warranty costs of \$20k, service and repair costs of \$15k, etc, the overall losses / costs are estimated at \$35.57k, of which brand damage is the biggest portion at \$20k, followed by revenue impact of \$15k. This calculator enables the company to estimate how much the counterfeit issue is costing and how those costs are broken down by category. This facilitates management decision-making in terms of 'how big the problem is, where risk mitigation efforts should be focused, which teams need to take leadership, and setting targets for improvement.

Counterfeit Incidents by the Method Uncovered – OCMs (2008 est.)



Source: U.S. Department of Commerce, Office of Technology Evaluation, Counterfeit Electronics Survey, November 2009.

Figure 7. Methods of Discovery of Counterfeit Incidents

TASK 6 - DEFINE/DEVELOP A METRIC THAT CAN BE USED TO IDENTIFY HOW BIG THE PROBLEM IS

The actual number of counterfeit electronics parts globally is likely unverifiable. The reason for this is because purchased parts reflect only a subset of all reported incidents^{9,10}. Secondly, the definition of incident is not an agreed-to, industry-wide metric.

For example, an IHS report estimates that the total count of incidents of counterfeit parts is roughly 12 million over a period of five to six years. That works out to be around one counterfeit part discovery every 15 seconds. The worldwide production of personal computers as of mid-2013 is 189 million units. Assuming a 16-hour, five-day workweek that's approximately 1,890 personal computers every 15 seconds. Since a single incident can include thousands of purchased parts, it is extremely difficult to establish the severity of the actual problem.

The total of separate verified incidents of counterfeit parts by IHS from September 2011 through August 2012 was 1,336 for transactions of over 834,079 parts that were actually purchased. The figures for actual purchased parts are considered to be conservative. At best, only qualitative understanding of the counterfeit problem exists today.

To make matters worse, Original Component Manufacturers (OCMs) learn about the majority of counterfeit components indirectly from customer returns. Figure 7 indicates how some counterfeit incidents are discovered while Figure 8 indicates the number of incidents and numbers of purchased parts affected. Typically, customers return components as defective, exhibiting poor performance, or having incorrect markings or physical appearance¹¹.

Most OCMs have no formal mechanism for customers to report and confirm counterfeit parts. Those OCMs that collect information typically track the following: type of products counterfeited, source countries, companies and individuals involved, and source reporting. Table 2 summarizes these variables as they are tracked by internal databases.

Very few OCM databases track "other" variables, such as affected customer, dollar value of parts, part numbers, type of counterfeits, and Customs and Border Protection (CBP) seizures. Hard data items that could lead to a more accurate determination for a true incident metric have not been collected.

Many companies have specific screening processes for components with matches to specific instances of counterfeits reported to the marketplace. Encompassing everything from stringent testing of the part to avoiding use of that part altogether. To screen a typical lot of 200 or less components costs between 800 \$US to 2,000 \$US. The lower range is usually just visual inspection; whereas the higher range is typically destructive analysis.¹²

⁹ Electronic Component Counterfeit Incidents Continued Record Pace, IHS Parts Management, October 2012

¹⁰ Counterfeit Chips on the Rise; by Celia Gorman, May 2012

¹¹ U.S. Dept. of Commerce - Defense Industrial Base Assessment: Counterfeit Electronics, January 2010

¹²Trace Laboratories report: Counterfeit Electronic Components: Understanding the Risk, 2012

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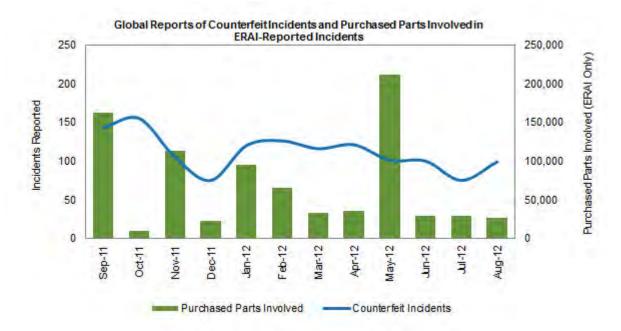


Figure 8. Incidents of Counterfeits and number of Purchased Parts Involved

Barriers to more accurate assessment of the current situation are¹³:

- Inspectors and/or vendors do not know the subtleties of an authentic part
- · There is no one central clearinghouse to collect information when counterfeit parts are detected
- · Currently no concept of a "trusted" umbrella third-party entity for the broader industry to share information

	Thacked by Internal Co						
Variable	s Tracked By Internal C	Counterfeit Database*					
Variable	Discrete Manufacturers	Microcircuit Manufacturers					
Suspected/Confirmed Counterfeit Products	100%	100%					
Countries of Origin	89%	95%					
Known/Suspected Companies and Individuals	89%	85%					
Source of Reporting	78%	95%					
Other	Other 11% 25%						
*Taken as a percen	t of those companies encounterir maintain an internal database.	ng counterfeits who					
	ent of Commerce, Office of Technol Survey, November 2009.	ogy Evaluation,					

Table 2. Variables Tracked by Internal Counterfeit Database

¹³ Counterfeit and Authenticity Verification – Not Just a DoD Issue, Premier Semiconductor Services, LLC; 2011 Development of a Methodology to Determine Risk of Counterfeit Use (© iNEMI 2013)

TASK 7 - VALIDATION APPROACH ON THE CALCULATOR METHODOLOGIES

Our validation approach was to present the work of the team and calculators at established conferences that attract experts in the field of counterfeit components. Feedback has been generally positive and many different organizations are currently reviewing the approach used in the calculators. For example, a similar approach is being developed for use in SAE standards. The iNEMI team and the SAE team are sharing details.

We had 50+ individuals attend two iNEMI webinars to introduce the calculators to industry. As of 10/31/13, more than 80 people had downloaded the calculators for review, and we conducted follow-up interviews with several of those. Furthermore, iNEMI members promoted the iNEMI calculators during presentations at the Software Assurance Working Group Sessions - Summer 2013 and at the SMTA-EAST 2013 conference. They were well received and the audience wanted copies of all 3 calculators

We learned that simplicity and flexibility of the calculators are vital. These tools are designed to work intuitively. Each different user and platform has different needs, making the simplicity of the method developed by iNEMI critical. This allows for broad application of the calculators and starts the risk-mitigation thought process.

These tools and their inherent simplicity have motivated conversations to help "lift the veil" off the problem of counterfeit electronics. Using these calculators, organizations have begun to look beyond assessment difficulties and look into fraud.

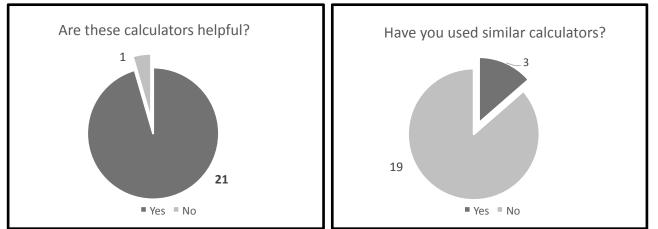
The calculators help users decide where to begin.

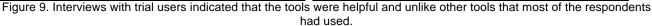
FEEDBACK

At the end of each webinar, we asked attendees to provide feedback on the calculators. We also followed up with several of them a few weeks after the webinars to ask questions regarding their use of the calculators.

The objective of gathering feedback was to determine if the calculators were useful and unique to attendees, or if we had created something that had already been done. Responses were overwhelming that the calculators were helpful and that we were not a reinventing the wheel. Figure 9 shows the responses for how helpful the calculators are and whether or not attendees had used similar calculators. Figure 10 ranked the usefulness of the calculators on a scale of 0 (not useful) to 4 (most useful).

In follow-up, respondents said the calculator tools were easy to comprehend, easy to follow, and "kept it simple" to use them.





The follow-up interviews indicated that users were finding the greatest value in using the calculator tools:

- With medical equipment
- In sustaining engineering phases
- · By smaller companies that may not have the resources to create their own tools
- · To increase the visibility of counterfeit components to the company's board

Very few respondents had seen similar calculators prior to the three developed by iNEMI, and those who had indicated that they were internally created tools. We believe these are the first industry-wide tools for examining the scope and details of counterfeit components.

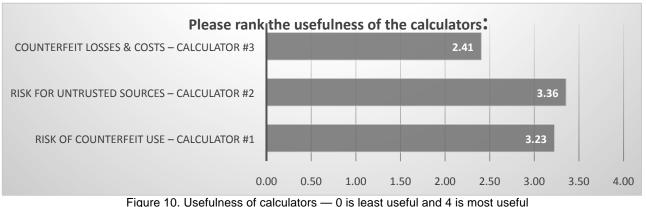


Figure 10. Useruiness of calculators — 0 is least userul and 4 is most userul

TECHNIQUES FOR DETECTION OF COUNTERFEITS / ANALYTICAL METHODS FOR FAILURE ANALYSIS

In addition to the assessment of risk of counterfeit use, the team reviewed the current state of detection techniques and analysis of counterfeits. A complete solution for mitigating counterfeits would include both an informed planning approach based on assessment of risk as well as an ongoing and post-production evaluation for the detection of counterfeits parts.

From a technology perspective, methods for distinguishing between genuine and counterfeit electronic components are very similar to physical analytical failure analysis techniques. There is a large battery of generic technologies, in addition to specialized techniques, employed in this effort. These techniques fall into three main groups:

- Electrical: cryptographic fingerprinting, electrical device, test electrical function, electrical parametric test, steganographic fingerprinting
- Physical / structural analyses: differential scanning calorimeter (DSC), defect detection using chemical penetrant, HW Trojan detection, nanoentonography, optical microscopy, package/label coding, thermomechanical analysis, X-ray microscopy, scanning acoustic microscopy
- Chemical / compositional techniques: scanning electron microscopy (SEM), electron back scatter, diffraction energy dispersive spectroscopy (EDS), Fourier transform infrared spectroscopy (FTIR), near infrared based chemical imaging, Raman spectroscopy; transmission electron microscopy (TEM), X-ray fluorescence (XRF), auger, time-of-flight secondary ion spectroscopy (TOF/SIMS), X-ray photoelectron spectroscopy (XPS)

These techniques have varying efficacy, maturity, and cost effectiveness in evaluating component quality, taint-integrity and for component authentication. While detecting taint in components is currently at the research level, it is nearly impossible to determine authenticity even in high quality parts using these techniques.

COUNTERFEIT DETECTION METHODS

Incoming inspection for counterfeit parts can be broken into two basic categories^{14 15}.

- 1) Procedures that anyone can execute to provide the minimum level of protection
- 2) Procedures that require more analytical techniques utilizing specialized equipment and expertise

¹⁴ Donald Davidson ,"An Assessment of Counterfeit Detection and Confirmation", SMTA/CALCE Counterfeit Symposium, June 2012

¹⁵ Gary M. Beckstedt, Jr., "Supply Chain Management and Internal Inspection Techniques to Mitigate Counterfeit Component Impact", SMTA/CALCE Counterfeit Symposium, June 2011

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Table 3 provides a list of some different types of analytical and inspection techniques. See Appendix 2 for details of the detection methods.

	Minimum Inspections for Receiving Parts	Detailed Analytical Inspection
	Optical inspection with stereo microscope	Scanning acoustic microscopy
tive s jues	X-ray inspection	XRF analysis
Von- destructive analysis Fechniques	Electrical test	Functional Test
Non- dest anal Tech		Gene Test
	Solvent test	Cross sectioning and microscopic inspection
	Decapsulation test	SEM-EDX
ysis		ICP/OES
Analysis		GC/MS
tive		UV-vis spectroscopy
Destructive / Techniques		FTIR spectroscopy
Des Teo		Ion chromatography (IC)

Table 3: Counterfeit Detection Methods

RECOMMENDATIONS

- 1. Use the tools to:
 - a. Discover weaknesses
 - b. Investigate those areas of highest concern
 - c. Realize the magnitude of your issue
- 2. Measure your risk:
 - a. Compare yourself to industry norms and published information
 - b. Compare yourself to your peers if you can get that information
- 3. Decide what to do to mitigate risk and optimize your risk mitigation plan to address the problem

Each instance is unique – we have given you a way of approaching the problem and risks to mitigate. How to do it may be unique for each of you.

FUTURE CALCULATOR DEVELOPMENT

- The initial set of tools are a vehicle for identifying common problems within an industry which in turn can foster collaboration toward a cross-industry/general solution.
- To continue the development of these calculators and to garner engagement and adoption in other industries, we
 recommend specifically targeting other industry segments to solicit use of the calculators, and to update and add
 functionality based on what is relevant to a specific segment.
 - For example, Medical (equipment), automotive, aerospace
- It is suggested that consecutive one-year projects to develop a broader industry calculator set with a narrow
 focus on counterfeit components in the three areas identified with the existing calculators be initiated.
- The next step will be to present to iNEMI membership to solicit another industry sector to continue to evolve the calculators

CONTRIBUTORS

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Appendix 1: Risk Assessment Calculator

Product	Profile	Inputs				-	Process				Outputs						Tot
1.11	Demand /			Mitigation &	Supplier		Ease of	Ease of	Counterfeit			Excess Inventory &					1
	EOL	Supplier	Supply Line	Controls	History	Score	Counterfeit	Detection	Controls	Score	Sales Channel	Prototype	Customer	Rework	Disposal	Score	
ASIC	4	1	-	-	1	-	(included)	1	1	4	-	1	-	-	-		
FPGA	ω	ω	s	ω		27	ω	ω	ω	27	ω	ω	ω	ω	ω	729	
FLASH	σı	ъ	5	л	5	625	5	w		75	л	СЛ	л	5	5	15625	
Hard Drive	ω	1		4	_	-1	5	3	2	30	4	4	5	3	сл	6000	

		_		
Lon dollard	how demand	Product has		
	Noknown			
		ļ		ï

Rating = 5	Rating = 4	Rating = 3	Rating = 2	Rating = 1	
Product has High demand & is EOL	No 4 rating	Product has Low demand and is EOL or high demand and not EOL	No 2 rating	Product has Low demand and/or is not EOL	
Boker or Ind. Distributor	No 4 rating	Authorised Distributor	No 2 rating	OCM	
Supply line not defined / clear	No 4 rating	Multiple known suppliers	No 2 rating	Direct from OCM	
No evidence of mitigation / controls	No 4 rating	Some evidence of mitigation / controls	No 2 rating	Supplier has Strong Counterf Mitigation & Controls Incidents	
Counterfeit supply confirmed	No 4 rating	Counterfeit supply suspected	No 2 rating	No known Counterfeit Incidents	

Easy - little / no investment required (<\$1000)	Needs simple equipment such as sand blasters and ink printers (<\$10k capital)	Requires moderate equipment and capital (\$10k-100k)	Requires major equipment / facilities such as wire bonders and laser markers, >\$100k capital	Very difficult to counterfeit; requires factory access or capital investment ->\$1M history
Difficult to detect; nearly indistinguisible from authentic	Requires advanced Some overt contro analytical tactics, i.e. / identifiers but XRD, CSAM, 3D X-ray validation not easy	Possible by routinely applied 2D X-ray inspection, decapsulation	Possible by optical inspection	Easy to detect, e.g. by check of packaging, documents, labels, history
No special controls in place	Some overt controls / identifiers but validation not easy	Overt and Covert Controls / identifiers but validation not easy	Unique Overt or Covert Controls / Identifiers that are easy to validate	Uses Unique Overt and Covert Controls & Identifiers that are easy to validate

No control / Unknown- Unknown Independent Distributors/Brokers /Unknown Sources	Very Limited - Primarily Reputable Independent Distributors/Brokers	Limited - OEMs/ CMs and some use of Brokers	Known channel: Franchised/ Authorized Distributors	Direct- OCMs/ Manufacturers /Suppliers
Excess and prototype inventory defined, open not controlled market.	Some controls in place. No traceable records. No security	Significant inventory but under tight controls and security	Excess and prototype inventory Trusted Sales Rep under tight controls and and Franchised security Distributor to OEM	Minimal Excess inventory. Very limited prototyping/tight OCM security and traceable records that are digitally signed/encrypted and/or indepedently audited.
Customer not defined, open market.	Independent Distributors, dependent on end user oversite.	Trusted Sales Rep and Unfrachished distributor to CMs	Trusted Sales Rep In-house and Franchised tight con Distributor to OEMs security	Direct to OEM
Offsite Vendor, no controls and no traceability	Offsite some controls in place. No traceable records. No security	Primarily offsite vendor based, with controls and security.	In house + vendor, In-house + vendor, under physical destruction, tight controls and traceable records, thi s security party certification*	In-house only under tight controls in certain In house only, on site designated areas, tight physical destruction, security and traceable traceable records records (signediencrypted signediencrypted and/or and/or independently independently audited) audited)
Offsite Vendor, no controls and no traceability	Offsite vendor, some controls and records. No proof of physical destruction	Offsite vendor, with controls and records for pyhsical destruction	In house + vendor physical destruction, traceable records, third party certification*	In house only, on site physical destruction, traceable records (signed/encrypted and/or independently audited)

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Appendix 2: Risk Assessment Calculator for Untrusted Sources of Supply Note: The numbers in the row of Supplier 1 provide an arbitrary example

Suppliers	Supplier Name	Supplier 1	Supplier 2	Supplier 3	
	IDEA	2			
k	GIDEP	2			
emberships	ISO 9000	2			
Memberships and Accreditations	SEMI T20	з			
tations	AS 6081	1			
	In House Testing using AS 6171 (after release of standard)	2			
	Score	48			
	Inspection	2			
Mitiga	Environmental conditions for handling, shipping, storage	3			
Mitigation and Controls	Insurance / Warranty	3			
	Policy in case of counterfeit occurrenc e	2			
	Policy in case of suspect parts but no actual proof of counterfeit	3			
	Score	108			
	Number of employees	2			
Com	Number of locations in different countries	3			
Company Characteristics	Business Scale	2			
eristics	Supplier History	1			
	Commodity Expertise	5			
	Score	60			
	Total Rating	208			
-					

APPENDIX 3: INSPECTION AND ANALYTICAL METHODS FOR COUNTERFEIT DETECTION

Inspection for counterfeit parts at incoming inspection can be broken into two basic categories: (1) one that almost anyone can execute for minimum level of testing and (2) one that requires more analytical techniques utilizing specialized equipment and expertise.

First category for inspection - minimum inspections for receiving parts

- 1.1 Non-destructive analysis
- a. Optical Inspection under a stereo microscope (2D or 3D OM).

Key items to look at include: package markings such as part number, date code, lot number, logo, and whether it is made with laser or ink. Often, font style ink quality and misspellings can give indicators of whether the marking is original or modified. The surface of the component body is inspected for any indicators of modification like scratches, evidence of contrasting gloss levels on the coating, residues. The pin 1 dimple is inspected for signs of grinding and possible residue from false coat. The leads are inspected for coated cuts and stress marks and for flux residue. Dimensions are validated with actual part measurements, especially in case of discrete passive components. Some types of taggants added by the OCM for authentication can be inspected.



Figure 3-1: Comparison of package markings on IC.

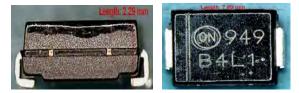


Figure 3-2: Examples of package modification indicators

b. X-ray inspection

Items to look for during x-ray inspection include the basic internal structure, die size, wire bond locations, missing wire bonds, excessive voids in silver epoxy, poor die attach, polarity of tantalum capacitors. If it is possible to save images from the X-ray imaging system, it could be useful to build a catalog of images for future reference.

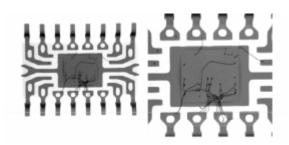


Figure 3-3: Abnormal wire bonding is found by X-ray

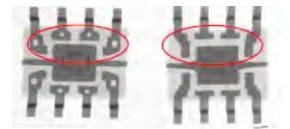


Figure 3-4: Bonding pad comparison by X-ray



Figure 3-5: One can see the ink mark on the outside of the package but X-ray imaging reveals reverse polarity.

c. Electrical test, also called static test

Electrical parameters of passives are validated against specifications with an LCR meter. A curve tracer is used to show characteristics and polarity of discrete semiconductors and to compare with specifications such as threshold voltage or leakage current.

1.2. Destructive analysis

a. Solvent test

Various solvents can be applied for a marking permanency test or to test for false top coat.

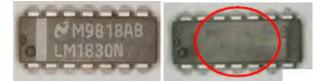


Figure 3-6: Marking confirmation with acetone.

b. De-capsulation test

Removal of the molding compound using chemical means to reveal the inner die surface permits inspection of the OEM die markings, device name, part number, design marks, the manufacturer's logo and review of the die edges for chipping.



Figure 3-7. Device name can be checked after decapsulation.

Second category — more complicated Inspections

The inspections listed below require some specialized equipment. Leverage of a qualified outside lab may be in the best interest if the minimum tests from above indicate some suspect characteristics that require more in-depth analysis.

- 2.1 Non-destructive analysis
- a. Scanning acoustic microscopy (C-SAM or TSAM)

This technique is not commonly used unless there is a special need. The method uses ultrasound to investigate the internal interfaces. Analysis using this technique is non-destructive. Operation of this type of equipment requires some level of expertise and training to be able to get and interpret the results. Items like delamination from the die, lead frame, or substrate and internal cracks due to stress may be investigated with this technique.



Figure 3-8: C-scan of BGA with severe delamination

b. XRF Analysis (EDXRF)

XRF is non-destructive provided the part does not need cutting to remove material that absorbs the fluorescence radiation from areas of interest. This technique can verify whether the elemental composition or the plating type and thickness are meeting the expected values. It can quantify materials that may be of interest like elements banned by RoHS, rare earth elements, or others intentionally added to facilitate authentication of the part.

c. Functional test

For integrated circuits, functional test usually requires automated test equipment, which is typically only accessible via the OCM or an external test service lab.

d. Gene test

A gene test is used to identify modified DNA added as a taggant.

2.2. Destructive analysis

a. Cross sectioning and microscopic inspection

After cross sectioning, one can inspect the internal structure of passive components, count the number of layers in ceramic capacitors, and look for stress cracks, delamination, and excessive voiding.

b. SEM-EDX.

The SEM can be used to analyze the surface morphology, e.g., to check for indications of sand blasting. SEM-EDX can be used to identify and quantify foreign elements and to confirm metallic plating.

c. ICP/OES

This technique is used to identify bulk composition and elemental levels with parts per million (ppm) accuracy. It is required for some RoHS tests.

d. GC/MS

GC/MS is used to identify or quantify compounds, e.g., the brominated compounds banned by RoHS.

e. UVvis spectroscopy

This technique is used, e.g., to quantify the hexavalent chromium banned by RoHS.

f. FTIR spectroscopy

This technique is used to classify or identify compounds.

g. Ion chromatography (IC)

This technique is used to quantify the amount of various ions of interest on the surface of a sample.



Figure 3-9: Analytical Detection Methodologies

Survey Questions	Answer	Answer	Answer
How would the calculator tools fit in your business process flow?	I am QA/Reg Compliance Mgr; tool would be used by Regulatory Group supporting Medical equipment manufacturing	I am consult advisor to start-up Medical companies to R&D Product Teams on reliability, risk and quality. Possible fit.	Not much use for these tools as we have already developed the tools systems but would be interested to hear of any developments.
	No tool driven process is in place today. We handle RMAs and Field repairs for our OEM customers.	The R&D Product teams generally worry about front-end selection of vendors to minimize risk and to assure FDA certification.	
		Separate Sustaining Engineering team is responsible for NPI to manufacturing.	
		Repairs and returns handled by manufacturer.	
Did you find the calculator tools easy to comprehend?	Yes! For those areas I did not understand the presentation cleared it up.	Yes! For those areas I did not understand the presentation cleared it up.	Yes - tools are easy to follow keep it simple.
Have you tried the calculator tools yet, or do you plan to use them in the future? Is there a particular reason why you don't plan to use these tools?	Plan on using everything but counterfeit losses and cost tool. No access to the data and does not match my skill set.	Yes! No specific plans yet.	We already have tools / systems well developed
Where do you see the greatest value proposition for the calculator tools?	Regulatory team supporting Medical equipment manufacturing worldwide.	Sustaining engineering phase.	Smaller companies that have not the resources or time to invest would find these tools useful. Also of use to companies who want to bring this problem to their board.
We discussed three tools. They calculate risk of counterfeit, risk for untrusted sources or counterfeit losses and cost. Which of these tools is of greatest interest for your mitigation risk approach?	All except the counterfeit losses and counterfeit losses and cost tool.	R&D Product Teams during initial design stage.	
Any suggestions on possible enhancements to the calculator tools?		No!	
Are there other key factors you believe the tools should consider to properly account for risk?		No particular thoughts at this time.	