

# Specification Section 425

## Subarticle 425-3

### ORIGINATION

Date: 6-24-2026

Name: Karen Byram

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### COMMENTARY

Change is needed to align with the proposed Spec 962 change.

### INDUSTRY COMMENTS AND RESPONSES

*(Please note all comments and responses are verbatim as received. The Specifications Office does not alter typos or grammar.)*

BLACK = Comment **BLUE** = Specifications Response **GREEN** = Change Made to Specification

Name: Jennifer Johnson

Date: 8-6-2026

COMMENT: Conflicts with Spec 105-4.2. Drainage Products have an accepted Producer Quality Control Program. Also 105-4.2.3 and 105-4.3 - Submission required to SMO or District Materials Office, not APL.

### **RESPONSE:**

Changes are pending for 105 to conform with the memo.

### **ACTION TAKEN:**

None

Name: Brian Gibbs

Date: 8-14-26

COMMENT: In no way shape or form should contractors be forced to use bricks and cement on the APL. What makes/keeps bricks and cements relatively low in cost is that you can get them anywhere. Most firms that supply these materials will not take the time to go through the APL approval process so you all will be limiting availability, increasing project cost, and causing project delay. We have not needed bricks and cement on the APL for the last 50 to 100 years, and we sure don't need it now.

### **RESPONSE:**

There is no change to free-flowing concrete or bagged concrete. This change is being made to comply with the federal regulations 2 CFR 184 and 23 CFR 635.410. Aggregate materials and

items that contain aggregate that are not free flowing, such as precast items and bricks, must be domestically sourced. These items are classified as manufactured products in accordance with 23 CFR 635.410. FDOT is required to verify that the location of the manufacturing process and general cost of the components meet the domestic requirements. FDOT chose to use the APL rather than have the contractor prove provide a manufacturer's domestic compliance certification for every lot of material. That certification would have been similar to the certification required for Iron and Steel materials and require the manufacturer to be listed on the FDOT Accepted Producers list.

For projects using precast and brick items that are not on the APL, contractors can provide the CEI, PE, or the Product Evaluation Section with the product manufacturer name and item model number. Product Evaluation will evaluate the manufacturer and product then add the product to the APL. This evaluation is normally a very fast turnaround.

**ACTION TAKEN:**

None.