

Buyer Action Register

Supply Chain & Operations Strategy | Executive Advisory

Clarity in Supply Chain & Operations.

BK Consulting | Sourcing Strategy & RFQ Guide | October 11, 2026

Purpose: convert geopolitical, policy, AI-demand, capacity, security and pricing developments into buyer decisions. Apply the five checks to every material award, renewal, volume commitment, alternate-source approval and manufacturing-route change.

Five standing sourcing strategy checks

ID / strategy check	Decision to make	Required output
S01 Market eligibility and origin	Which supplier, configuration and production route can serve each destination and customer? Separate manufacturing country, ownership/control, customs origin, preference and procurement eligibility.	Approved part-route-customer combinations; restriction screening; unresolved origin questions and owner.
S02 Qualified alternatives and shared dependencies	What disruption does each alternate protect against, and what remains common below Tier 1?	Qualified site/source alternatives; consequential upstream dependencies; activation lead time; committed capacity; residual risk.
S03 Usable qualified capacity and AI displacement	How much output for the exact specification remains available after commitments, qualification, yield and product-mix priorities?	Quarterly qualified allocation; demand scenario; qualification milestones; displacement triggers; volume flexibility.
S04 Comparable landed pricing and total exposure	Should we lock, stagger, shorten, reprice or buy an option?	Comparable landed-cost scenarios; price reset; commitment limits; diversification cost versus exposure.
S05 Security, firmware and lifecycle control	Which sources, firmware steps, substitutions and changes require evidence or requalification?	Risk-based component/firmware evidence; configuration control; incident process; service and replacement provisions.

Commercial decision gate

Record S01-S05 as PASS, EXCEPTION or NOT APPLICABLE with supporting evidence. An EXCEPTION needs an owner, mitigation, consequence and review or expiry date. Commercial acceptance cannot override a legal prohibition. Reuse supplier, site and process evidence across parts, but reopen affected combinations after a material rule, ownership, factory, BOM, firmware, process or customer change.

Geographic diversification principle

An unrestricted Chinese-owned supplier with qualified production outside China can remain an option. Test source-based restrictions, ownership/control, customer eligibility, origin, security and common upstream dependencies separately. Outside-China production and BIOS flashing are not automatic compliance or origin safe harbors.

Three standing RFQ requirements

R01 Supply-chain and eligibility evidence

Proposed RFQ wording: "For each quoted part or configuration, identify the contracting entity, actual manufacturer, proposed production sites and manufacturing stages, asserted origin and basis, relevant ownership/control, and covered or restricted-source exposure for the specified destination and customer. Provide supporting records and identify unknowns or exceptions. For designated critical components, provide requested upstream manufacturer and site evidence."

Response fields: part/revision; supplier entity; factory; substantive process; claimed origin by regime; ownership/control; upstream evidence requested; customer route; exception; document date.

R02 Availability, allocation, qualification and alternate activation

Proposed RFQ wording: "State qualified output available to this award by delivery period after prior commitments, the basis of allocation, lead time and proposed alternate site or source. Identify customer qualification, activation milestones and dependencies shared with the primary route. Quote the cost and terms of reserving alternate capacity and volume flexibility."

Response fields: wafer or input capacity; qualified product output; contractual allocation; period; lead time; alternate; shared dependency; qualification owner/date; reservation cost; activation trigger.

R03 Comparable primary and alternate economics and change protection

Proposed RFQ wording: "Quote the same specification and delivery basis for primary and alternate routes. Itemize duty assumptions, freight, conversion, qualification or NRE and other material differences. Propose price-reset and volume-flexibility terms. Define notification and approval for changes to sites, critical sources, ownership/control, firmware or process that could affect eligibility, quality, security, price or delivery."

Response fields: base price; index/reset; duty assumption; freight; NRE; option cost; volume bands; change notice; approval; remedy; exception.

Weekly actionable deltas

Material changes appear first. Legal status is separated from BK recommendations. Open items carry forward with stable IDs; closed items require a reason.

ID / status	Legal or market status and affected routes	Buyer action / strategy / RFQ	Evidence, owner and trigger
W07 ADDED	USMCA joint-review consultation open. Comments and hearing requests due Jan. 12, 2027. No new origin rule is effective. Electronics, power, auto and North American routes.	Build top-10 part-route origin model and comment evidence. S01/S04; R01/R03.	Origin model, qualification lead time, alternative capacity, delivered-cost delta. Owner: trade + category. Due: Dec. 15 internal draft.
W08 ADDED	GLM Components Puebla RRM review requested Oct. 8; liquidation suspended for unliquidated entries from the facility. Allegation is not a final finding. Auto parts / Mexico-U.S.	Map open entries, inventory and alternate output by site; add facility-level RRM notice. S01/S02/S04; R01-R03.	Entry list, customs status, BCP, remediation notice. Owner: customs + category. Trigger: Mexico response or USTR scope change.
W09 ADDED	Optical capacity market risk. Lumentum reports effective sellout through early 2029; InP substrate restrictions and strategic commitments constrain free output. AI/networking.	Trace module to laser and InP; request quarterly qualified uncommitted allocation. S02/S03/S04; R02/R03.	Laser/substrate source, fab, package, allocation, qualification. Owner: optics category + engineering. Review monthly.
W04 CHANGED	NAND divergence. Q4 contracts forecast +15% to +20%; client demand softens while enterprise SSD pricing accelerates. Memory/storage.	Stagger commitments by application; cover enterprise through mid-2027; preserve 2028 volume flex. S03/S04; R02/R03.	Utilization, inventory, contract/spot spread, enterprise qualification and allocation. Owner: memory category. Monthly trigger set.
W10 ADDED	Micron Taoyuan strike authorized; no strike date. Memory parts touching Taiwan operations.	Confirm part/site/process exposure and qualified recovery route; do not overbuy on authorization alone. S02/S03; R02.	Supplier BCP, WIP recovery, alternate site and notice. Owner: memory category. Trigger: Oct. 19 or strike notice.
W11 ADDED	Industrial AI insurance/control. AI exclusions and coverage gaps can affect autonomous operational use. OT, maintenance, quality, planning and purchasing agents.	Require authority states, hard limits, shutdown, logs, incident path and coverage mapping before write access. S05; R01/R03.	Architecture, test records, policy/exclusions, incident plan. Owner: OT security + risk. Trigger: production authorization.
W01 UNCHANGED	Computer origin / USMCA. Preference, trade-remedy origin and manufacturing location remain separate.	Record applicable regime and imported configuration. S01; R01.	Current GN 11 and product/process analysis. Reopen on classification or process change.
W02 UNCHANGED	Section 5949 statutory start Dec. 23, 2027; FAR implementation remains proposed. Covered source differs from factory location.	Request configuration-specific covered-source evidence and substitution control. S01/S05; R01/R03.	Final FAR rule, clauses, inquiry and exception records. Owner: legal + federal sales.
W03 UNCHANGED	Firmware origin remains case-specific; substantive programming can matter, generic replacement may not.	Document functionality, development and installation sites and legal regime. S01/S05; R01.	Product-specific ruling or analysis. Reopen on firmware or route change.
W05 UNCHANGED	Optical-transceiver bill remains introduced, not enacted.	Cost alternatives and map named-source exposure without imposing a current ban. S01/S02/S05; R01.	Bill status, text, customer clauses. Owner: legal + optics category.
W06 UNCHANGED	Upstream steel/material source remains a category decision; no universal U.S.-steel obligation asserted.	Request consequential mill/source evidence and compare diversification cost with exposure. S02/S04; R01-R03.	Source, qualified alternative, capacity, premium and consequence. Owner: category.

Buyer readiness metrics and cadence

Metric	Definition and review
Critical demand covered	Share of critical demand covered by qualified, eligible and committed alternate output; monthly.
Unresolved eligibility	Material part-route-customer combinations with unresolved origin, policy or customer evidence; weekly exceptions.
Shared dependencies	Critical primary/alternate combinations sharing a consequential upstream dependency; monthly.
RFQ completeness	Share of material awards with R01-R03 answered, supported or explicitly excepted; each award.
Qualification / activation	Open milestones, demonstrated yield/output and time to activate alternatives; monthly.
Diversification economics	Incremental landed cost, NRE and option cost versus disruption exposure; each material decision.
Evidence / change currency	Expired declarations and unreviewed supplier, site, BOM, ownership or firmware changes; monthly and event-driven.

Dated change history

Date	Change
Oct. 11, 2026	Added W07-W11; revised W04 NAND timing and application divergence; retained S01-S05 and R01-R03.
Oct. 4, 2026	Initial canonical register with six running items and standing buyer framework.

Sources and verification notes

Evidence, management statements, market estimates and BK Consulting judgments are separated in the text. Sources were accessed October 11, 2026. Legal status should be checked again at the transaction or award date.

[1] USTR USMCA consultation - <https://ustr.gov/about/policy-offices/press-office/press-releases/2026/october/ustr-seeks-public-comment-2027-joint-review-usmca>

[2] USTR GLM Components RRM action - <https://www.ustr.gov/about/policy-offices/press-office/press-releases/2026/october/united-states-seeks-mexicos-review-alleged-denial-workers-rights-glm-components-mexico>

[3] TrendForce Q4 memory outlook - <https://www.trendforce.com/presscenter/news/20260930-13258.html>

[4] NVIDIA-Lumentum partnership - <https://nvidianews.nvidia.com/news/nvidia-announces-strategic-partnership-with-lumentum-to-develop-state-of-the-art-optics-technology>

[5] Reuters Micron Taiwan labor vote - <https://www.reuters.com/business/world-at-work/microns-taoyuan-union-taiwan-secures-authorisation-strike-2026-10-07/>

[6] Aon AI risk and insurance report - <https://www.aon.com/en/insights/reports/ai-risk-is-outpacing-insurance-what-organizations-need-to-know-in-2026>

[7] NIST C-SCRM due diligence guide - <https://www.nist.gov/news-events/news/2026/07/nist-releases-finalized-c-scrm-due-diligence-assessment-quick-start-guide>

[8] USITC HTS General Note 11 - <https://hts.usitc.gov/reststop/file?release=currentRelease&filename=General%20Note%2011>

[9] Proposed FAR Section 5949 implementation - <https://www.govinfo.gov/content/pkg/FR-2026-02-17/pdf/2026-03065.pdf>

[10] S. 5548 introduced optical-transceiver bill - <https://www.govinfo.gov/content/pkg/BILLS-119s5548is/html/BILLS-119s5548is.htm>