

CONTROLLER REPLACEMENT DISCLOSURE FORM

DCF Electronic Inc. — Technician/Installer Compliance Document
Retain for Minimum 7 Years

PURPOSE OF THIS DOCUMENT

This form is required when technicians or installers replace refrigeration/climate control controllers on customer equipment. Federal law (49 U.S.C. § 32703) requires accurate disclosure of equipment operational hours. This document ensures compliance and protects both service providers and equipment owners from fraud liability.

WHEN THIS FORM IS REQUIRED

Complete this form whenever:

- Installing a new controller (OEM or aftermarket) on existing equipment
- Installing a remanufactured controller from DCF Electronic Inc. or other supplier
- Replacing a failed controller that results in hour meter reset
- Swapping controllers between units for any reason
- Performing warranty replacement of controller components

This form is NOT required for:

- Firmware updates that preserve hour meter data
 - Repair of existing controller without component replacement
 - Calibration or configuration changes only
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EQUIPMENT IDENTIFICATION

Service Date: _____

Service Location: _____

Work Order Number:

Equipment Type: _____
(Trailer refrigeration unit, APU, truck HVAC, GenSet, etc.)

Equipment Make/Model:

Equipment VIN or Serial Number:

Equipment Owner/Fleet:

ORIGINAL CONTROLLER INFORMATION

Original Controller Type:

(Thermo King SR-3/SR-4, Carrier X4/Vector X2, TriPac, ComfortPro, etc.)

Original Controller Serial Number:

Original Controller Part Number:

Date Original Controller Removed:

Hours Displayed on Original Controller:

Reason for Replacement:
☐ Controller failure/malfunction
☐ Component failure (specify):

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- ☐ Upgrade to newer model
 - ☐ Warranty replacement
 - ☐ Preventive maintenance
 - ☐ Other: _____

Original Controller Disposition:

- ☐ Returned to customer
 - ☐ Sent to DCF Electronic Inc. for repair
 - ☐ Retained for core exchange
 - ☐ Disposed/recycled
 - ☐ Other: _____
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REPLACEMENT CONTROLLER INFORMATION

Replacement Controller Type:

Replacement Controller Serial Number:

Replacement Controller Part Number:

Controller Source:

- ☐ New OEM (original equipment manufacturer)
 - ☐ Remanufactured by DCF Electronic Inc.
 - ☐ Remanufactured by other supplier:
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- ☐ Used/salvage
- ☐ Warranty replacement from manufacturer

Date Replacement Controller Installed:

Initial Hours Displayed on Replacement Controller:

TOTAL EQUIPMENT HOURS CALCULATION

CRITICAL: Controller hours $\neq$ Equipment hours

Description	Hours
(A) Hours on ORIGINAL controller at removal	
(B) Hours on REPLACEMENT controller at installation	
TOTAL EQUIPMENT HOURS at time of replacement	(A) + (B) =

Formula for Future Reference:

Current Total Equipment Hours = (A) + Current Replacement Controller Hours

Example:

- Original controller removed at 5,000 hours
- New controller installed showing 0 hours
- Total equipment hours at installation: 5,000 hours
- After 1,000 more hours of operation, new controller shows 1,000 hours
- **ACTUAL TOTAL EQUIPMENT HOURS: 6,000 hours ✓**

FEDERAL DISCLOSURE REQUIREMENT

Legal Obligation Under 49 U.S.C. § 32703

When equipment owner sells, leases, or transfers this equipment, they **MUST** disclose:

"Total equipment operational hours: _____ hours (controller replaced on [date]; current controller displays _____ hours)"

Penalties for Non-Disclosure

Federal Felony Offense:

- Fines up to **\$250,000**
- Imprisonment up to **7 years**

- Civil liability for fraud and misrepresentation
- State consumer protection violations

Service Provider Responsibility

By completing this form, you certify that you have:

- Documented original controller hours before removal
- Calculated total equipment hours accurately
- Provided Equipment Hour Tracking Record to equipment owner
- Informed owner of their legal disclosure obligations
- Retained photographic evidence of original hour display (if possible)

CUSTOMER NOTIFICATION CERTIFICATION

Did you provide the following documents to the equipment owner?

- ☐ **Equipment Hour Tracking Record** (mandatory)
- ☐ **EEPROM Replacement Authorization** (if applicable)
- ☐ **Copy of this Controller Replacement Disclosure**
- ☐ **Photographs of original controller hour display**

Did you verbally explain to the customer:

- ☐ The difference between controller hours and total equipment hours
- ☐ Their legal obligation to disclose controller replacement when selling equipment
- ☐ The federal penalties for hour meter misrepresentation
- ☐ The requirement to maintain Equipment Hour Tracking Record permanently

Customer Acknowledgment of Receipt:

Customer Name: [REDACTED CLIENT NAME]

Customer Signature: _____

Date: _____

TECHNICIAN/INSTALLER CERTIFICATION

I certify under penalty of perjury under the laws of the United States and State of Florida that:

- I have accurately documented the original controller hour meter reading
- I have correctly calculated total equipment hours using the formula provided
- I have provided the Equipment Hour Tracking Record to the equipment owner
- I have informed the owner of their federal disclosure obligations
- I performed this service for legitimate repair/replacement purposes only
- I have not been requested to misrepresent equipment hours or operational history
- All information provided on this form is true, accurate, and complete

TECHNICIAN INFORMATION

Technician Name: [REDACTED TECHNICIAN NAME]

Company/Employer: _____

Address: [REDACTED ADDRESS]

Phone: [REDACTED PHONE]

Email: [REDACTED EMAIL]

License/Certification Number (if applicable):

Technician Signature:

Date Signed: _____

SERVICE COMPANY INFORMATION

Company Name: _____

Company Address: _____

Company Phone: _____

Company Email: _____

Authorized Manager/Supervisor:

Manager Signature (if required):

Date: _____

PHOTOGRAPHIC DOCUMENTATION

Photographs are critical evidence for legal compliance.

Original Controller Hour Display:

☐ Photo attached showing hour meter reading

☐ Photo file name: _____

☐ Unable to capture (controller non-functional)

Replacement Controller Hour Display:

☐ Photo attached showing initial hour meter reading

☐ Photo file name: _____

Equipment Identification Photo:

☐ VIN plate or serial number photograph attached

☐ Photo file name: _____

RECORD RETENTION REQUIREMENTS

- **Service Provider:** Retain this form for minimum 7 years with work order documentation
- **Equipment Owner:** Retain Equipment Hour Tracking Record permanently with equipment title and service records

- Attach all photographic evidence to this disclosure form
 - Provide copy to equipment owner upon request
 - Make available to regulatory authorities or law enforcement if requested
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LEGAL WARNINGS FOR SERVICE PROVIDERS

Prohibited Actions — Federal Crimes

Service providers shall NOT:

- Reset or reprogram hour meters to conceal actual equipment usage
- Install controllers programmed with false hour readings
- Assist customers in misrepresenting equipment operational history
- Fail to document or disclose controller replacements
- Destroy or conceal records of controller hour readings

Aiding and Abetting Fraud

Knowingly assisting equipment owners in hour meter fraud constitutes:

- Federal conspiracy charges (18 U.S.C. § 371)
- Aiding and abetting fraud (18 U.S.C. § 2)
- State accessory to fraud charges
- Professional license revocation
- Civil liability for damages

Compliance Is Your Legal Protection

Completing this form and providing proper documentation protects you from:

- Criminal prosecution for fraud facilitation
- Civil liability in customer disputes
- Professional licensing board actions
- Involvement in federal investigations

ATTACHMENTS CHECKLIST

- ☐ Photograph of original controller hour meter display
 - ☐ Photograph of replacement controller hour meter display
 - ☐ Photograph of equipment VIN or serial number plate
 - ☐ Equipment Hour Tracking Record (copy for service provider)
 - ☐ EEPROM Replacement Authorization (if applicable)
 - ☐ Service invoice or work order
 - ☐ Controller warranty documentation
 - ☐ Parts purchase receipt
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DCF ELECTRONIC INC. USE ONLY

Controller Source (if DCF-supplied):

Work Order Number: _____

Remanufactured Unit Serial:

Original Core Received: ☐ Yes ☐ No

Core Serial Number: _____

Warranty Registration: ☐ Complete ☐ Pending

Notes: _____

Document Version: 1.0

Effective Date: March 3, 2026

DCF Electronic Inc.

Contact: [Contact information retained for business records]

**LEGAL COMPLIANCE DOCUMENT — REQUIRED FOR ALL
CONTROLLER REPLACEMENTS**