



November 1, 2023

Taylor Jantz-Sell  
ENERGY STAR Lighting Program Manager  
U.S. Environmental Protection Agency  
Washington, DC 20460

Re: NEMA and ALA Comments Regarding ENERGY STAR® Downlights V1.0 Draft Final

Submitted electronically to [lighting@energystar.gov](mailto:lighting@energystar.gov)

Dear Taylor,

The National Electrical Manufacturers Association (NEMA) represents nearly 325 electrical equipment and medical imaging manufacturers that make safe, reliable, and efficient products and systems serving building systems, building infrastructure, lighting systems, industrial products and systems, utility products and systems, transportation systems, and medical imaging. Our combined industries account for 370,000 American jobs in more than 6,100 facilities covering every state. These industries produce \$124 billion in shipments and \$42 billion in exports of electrical equipment and medical imaging technologies per year.

The American Lighting Association (ALA) represents over 1,300 member companies in the residential lighting, ceiling fan and controls industries in the United States, Canada, the Caribbean, and Mexico. Member companies are manufacturers, manufacturers' representatives, retail showrooms and lighting designers.

Members of NEMA's Lighting Systems Division and ALA members have reviewed the Draft Final specification and would like to thank you, Dan Rogers at ICF, and all ENERGY STAR® lighting stakeholders for the collaborative process to develop this new specification and certification program. Our members are excited to certify higher performance downlight products and we welcome collaboration opportunities with retailers and energy efficiency programs to support a robust and impactful program launch. We are proud of our accomplishments with the ENERGY STAR team over the past three decades and look forward to celebrating future achievements.

Warm regards,

A handwritten signature in black ink, appearing to read "Alex Baker", written in a cursive style.

Alex Baker  
Director, Regulatory Affairs