



August 2, 2017

**VIA EMAIL**

Abigail Daken  
ENERGY STAR HVAC Program  
U.S. Environmental Protection Agency  
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Washington, DC 20460  
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**RE: Comments of the American Lighting Association on the U.S. Environmental Protection Agency's Draft 2 Version 4.0 ENERGY STAR® Residential Ceiling Fans specification**

Dear Ms. Daken:

The American Lighting Association (ALA) represents over three thousand members in the residential lighting, ceiling fan and controls industries in the United States, Canada and the Caribbean. Our member companies are manufacturers, manufacturers' representatives, retail showrooms and lighting designers that have the expertise to educate and serve their customers. The membership of ALA includes 19 manufacturers of ceiling fans or ceiling fan light kits (CFLK) and nearly 975 retail showrooms that sell ceiling fans or CFLKs.

ALA appreciates the opportunity to submit these comments on Draft 2 Version 4.0 ENERGY STAR® Residential Ceiling Fans specification (July 5, 2017)<sup>1</sup>. These comments are submitted on behalf of a group of ALA members and other interested parties<sup>2</sup> that would be directly impacted

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<https://www.energystar.gov/sites/default/files/Ceiling%20Fans%20Draft%202%20Version%204.0%20Specification.pdf>

<sup>2</sup> Specifically, ALA submits these comments on behalf of the following entities: Canarm Ltd.; Casablanca Fan Company/Hunter Fan Co.; Emerson Ceiling Fans; Fanimation; Feiss - Monte Carlo; HKC, US; Kendal Lighting Inc.; Kichler Lighting; Litex Industries Limited/Ellington Fans/Craftmade; Luminance; Lutron Electronics, Inc. Matthews Fan Company & WPT Design; Minka Group; Pacific Coast Lighting, Inc./Lamps Plus; Progress Lighting, a Division of Hubbell; Quorum International; Regency Ceiling Fans; Savoy House Lighting; The Modern Fan Co.; Vaxcel International; and Westinghouse Lighting.

by the specification – companies that manufacture, import, distribute, and retail ceiling fans in U.S.

**Support for the ENERGY STAR® Program**

ALA believes that ENERGY STAR® continues to be an important program, offering consumers with an array of energy efficient products. Advancing the goal of achieving greater energy-efficiency is wholly supported by ALA members. ALA’s ceiling fan and CFLK manufacturers are overall supportive of the latest draft, however, the updated requirements in the ceiling fan specification run the risk of a manufacturers’ ability to offer qualifying products. In turn consumers will be left with alternative (potentially less-efficient) choices.

To ensure a wide range of product availability, ALA encourages the Environmental Protection Agency (EPA) to reconsider many of the comments submitted by ALA and our members to Draft 1.<sup>3</sup>

**CONCLUSION**

Throughout this process, ALA has enjoyed the open communication with EPA staff and appreciates their willingness to listen to industry’s concerns. ALA hopes this continues as Version 4.0 moves toward completion. Thank you for considering these comments.

Respectfully Submitted,



Eric Jacobson, CAE  
President & CEO

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cc: Taylor Jantz-Sell, EPA  
Jacob Bayus, ICF  
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Lucy deButts, DOE

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<sup>3</sup>

<https://www.energystar.gov/sites/default/files/ENERGY%20STAR%20Ceiling%20Fans%20Draft%201%20Version%204.0%20Specification.pdf>