

Buy American Act (BAA) FAQ

FAQ

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1. What is BAA and when does it apply?

The **Buy American Act (BAA)** is a federal law implemented through FAR 52.225-9, that requires use of "domestic construction materials" on federally funded projects for federal facilities such as Federally owned buildings, US military facilities, National Parks, and National Research Labs.

2. Is LFCR available as a BAA-compliant product?

Yes. LFCR is available in BAA-compliant configurations. The fixture is assembled in the United States, meeting the requirements of FAR 52.225-9 under the COTS (Commercially Available Off-The-Shelf) pathway.

BAA-compliant LFCR offerings also qualify as a **domestic construction material** projects subject to the requirements of the Trade Agreements Act (TAA). Projects exceeding a financial threshold can be subject to the rules of FAR 52.225-11 (Buy American under Trade Agreements) which also allows BAA-compliant "domestic construction materials". BAA-compliant products can cover both scenarios.

3. What does "assembled in the USA" mean for LFCR?

LFCR BAA units are assembled at a **Current Lighting U.S. facility**. Domestic production involves assembly of the fixture's components and sub-assemblies in the final ordered product form.

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4. How is ordering a BAA unit different from a standard LFCR?

The core product performance, photometrics, and aesthetics are identical. The difference is in the SKU structure and where the fixture is assembled before it ships to you.

Standard LFCR

- **New Construction:** Ordered as a 3-part system (housing, fixture module, and trim).
- **Remodel:** Ordered as a 2-part system (fixture module and trim). Components are selected separately for maximum configuration flexibility.

LFCR BAA

- **New Construction:** Ordered as a 2-part system consisting of a pre-assembled housing (housing with driver installed) and pre-assembled trim assembly (LED heatsink with trim attached).
- **Remodel:** Ordered as a single SKU with the trim pre-installed on the fixture module.

The US production facility assembles the required components and sub-assemblies into the BAA compliant downlight configuration.

	Standard LFCR	LFCR BAA
SKU Structure	3-part system (housing + module + trim)	2-part system (housing w/ driver + trim w/ LED heatsink)
New Construction	LFCR-4RD-H + LFCR-4D-MN-15L35K9-WD-DM1 + LFCR-4RD-T-WD-SS	LFCR-4RD-HN-15LDM1-BAA + LFCR-4RD-TN-15L35K9-WD-SS-BAA
Remodel	LFCR-4D-MR-15L35K9-WD-DM1 + LFCR-4RD-T-WD-SS	LFCR-4RD-MR-15L35K9-WD-DM1-SS-BAA
Assembly	Non-U.S. facility	U.S. domestic facility
Product Marking	Standard country of origin	"Assembled in USA from local and foreign components"
Compliance	Standard commercial use	FAR 52.225-9 (BAA) : TAA eligible
Lead Time	Standard	Allow additional time for U.S. assembly
Configurations Available	Full catalog offering	Select configurations only*

*Only configurations published on the BAA LFCR spec sheet are eligible for the BAA path. Please consult your Current Lighting representative for custom or project-specific BAA configurations that are not available on the spec sheet.

5. Does a BAA version automatically qualify for a BABA project?

No. BABA (Build America, Buy America Act) carries stricter requirements—it requires both U.S. assembly and a minimum of 55% domestic Cost of Components. If your project is subject to BABA (common on infrastructure and grant-funded projects under the Infrastructure Investment and Jobs Act), please consult your Current Lighting representative to discuss options.

6. How do I specify or order the BAA version?

When writing a specification or placing an order for a BAA-required project:

- **Confirm the compliance requirement**
Verify whether your project requires BAA (FAR 52.225-9), TAA, or BABA. BAA and TAA are supported; BABA is not.
- **Use the LFCR -BAA specification sheets**
BAA configurations are published on dedicated -BAA specification sheets that are separate from the standard LFCR spec sheets. Only configurations listed on the -BAA spec sheets are pre-validated for BAA compliance.
- **Need something not listed on the -BAA spec sheets?**
If your project requires a configuration that does not appear on the -BAA specification sheets, contact your Current Lighting representative to confirm availability and lead time before specifying or committing to a schedule.
- **Notify your rep at time of order**
Flag the BAA requirement when submitting the order so order lead times for BAA compliant product can be properly scheduled.
- **Request documentation if needed**
Compliance documentation and product marking confirmation are available upon request for submittal packages.

7. Who can I contact with questions?

Reach out to your **Current Lighting sales representative or project manager** for project-specific guidance, compliance documentation, or submittal support.