

Rad Power Bikes Inc. Public Comments on New York City Department of Consumer and Worker Protection Proposed Safety Standards for Powered Bicycles, PMDs and Batteries

(Reference Number 2023 RG 063)

Rad Power Bikes is pleased to submit these comments to the New York City Department of Consumer and Worker Protection (“DCWP”) in support of its proposed rule to implement Local Law 39 of 2023.

Rad Power Bikes is the largest direct-to-consumer electric bike maker in North America. We are committed to keeping our riders safe. Our commitment to making high-quality, reliable electric bikes that provide great value at an affordable price is why Rad Power Bikes is the largest electric bike brand in North America, with nearly 600,000 people riding Rad Power Bikes products worldwide.

Because safety is a top priority for us, we welcome the DCWP’s initiative to add rules to clarify the requirements in Local Law 39 of 2023.

We support DCWP’s proposed definition of “accredited testing laboratory” as written in the proposal. This definition provides needed clarity to the regulated community, while also helping to create a safe, reliable riding experience for all. The listed accreditations in the definition are adequate to ensure that testing laboratories are competent to certify compliance with the relevant safety standards, while providing sufficient flexibility to regulated entities with respect to the choice of accredited labs. As the e-bike market continues to grow, and the safety standards for the products are made more rigorous, it will be important to ensure that there is sufficient lab capacity to manage these assessments. For these reasons, we support this proposed rule.

Thank you for considering our comments. If you have any questions about our comments, please contact Batur Oktay, VP and General Counsel, at batur.oktay@radpowerbikes.com.

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