



Date: October 13, 2023

Dear New York City and the Department of Consumer and Worker Protection:

ACT Lab is a globally recognized ISO/IEC 17025 accredited testing firm with locations throughout the globe providing testing and consultation services for the powered mobility, bicycle, motorcycle, outdoor, and many other industries.

ACT Lab firmly supports the proposed rule to clarify the definition of “accredited testing laboratory” for the NYC administrative code for powered mobility device requirements as *“any testing laboratory that is an International Organization for Standardization and International Electrotechnical Commission (“ISO/IEC”) 17025 Accredited Independent Testing Laboratory, an ISO/IEC 17065 Accredited Certifying Body, or participates in the U.S. Department of Labor Occupational Safety and Health Administration Nationally Recognized Testing Laboratory program.”*

By adopting this language and clarifying the acceptance of official electrical system evaluation from competent, accredited, U.S. federal and internationally recognized testing institutions to these important safety standards, we believe NYC and the DCWP will immediately increase consumer protection for the citizens of NYC and the United States from the potential hazards associated from “untested” powered mobility products. This will also increase awareness and education of manufacturers and suppliers worldwide seeking to bring these products to market.

ACT Lab launched the [e-validate](http://act-lab.com/e-validate) initiative to better serve NYC and other entities that adopt similar regulations. This online directory provides immediate validation of products that comply with these important electrical safety standards. We encourage you to look for our labels on powered mobility products and visit this important online consumer resource.

Please contact us if you have any questions on this matter.

Sincerely,

**Michael Baker**  
Director of Corporate Communications  
ACT Lab

