



Giant Bicycle, Inc.  
3587 Old Conejo Rd  
Newbury Park CA 91320

October 15, 2023

Via Website and U.S. Post

New York Department of Consumer and Worker Protection  
42 Broadway, 9<sup>th</sup> Floor  
New York, NY 10004

**RE: Giant Bicycle, 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)**

Giant Bicycle, Inc. is the US Distributor of Giant, Liv, and Momentum branded bicycles and E-Bicycles. Our products are sold through 1000+ independently owned small business retailers throughout the United States. The Giant Bicycle family includes Giant Manufacturing which is the world's largest producer of quality bicycles including engineering and building E-Bikes for over 25 years. Our world-class supply partners for E-Bike components include Yamaha motors and Panasonic batteries.

Giant's E-Bike engineering and manufacturing always put consumer safety and the highest quality product standards as the top priority for long-term sustainable global business. Giant has always met, exceeded, or set industry standards for mechanical and electronic components.

Giant Bicycle, Inc. and Giant Manufacturing focus on continuous improvements and the evolution of products and standards. Giant has adhered to the Internationally adopted "EN15194" global E-Bike safety standards since its inception in 2009, followed by 2<sup>nd</sup> generation updates instituted in 2017 as well as the globally harmonized United Nations UN38.3 battery transport test standards. Giant uses certified 3<sup>rd</sup> party validation testing laboratories in Europe, the United States, and Asia, including UL laboratories business testing for the compliance standards listed above.

Choices in safety standards that are equal are good for the industry and acceptable if harmonized by their redundancies. UL Labs created the UL2849 lab product standard from the existing EN15194 standard as a redundant choice. However, a potential monopolization of a redundant standard applies more stress on the consumer economy and small businesses without any improvement in unsafe products imported into the US by non-complying entities or their importers of those products. By endorsing and harmonizing the redundant EN15194 E-Bike global safety standards, Giant affirms our commitment to manufacturing products that adhere to the highest safety and quality standards. We believe that a unified international approach to standards development will harmonize regulations across markets, eliminate trade barriers, and streamline compliance efforts for manufacturers, ultimately benefiting consumers and small businesses as a whole.

**Giant Bicycle, Inc.**

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A rule that limits testing to only one Nationally Recognized Testing Lab (NRTL) will result in limited product offering to consumers, higher consumer costs and accessibility, unequal product offering, and **will not** provide a product that is safer than a product that meets harmonized and well established International testing standards.

In conclusion, we applaud the New York Mayor's office, the FDNY, and the Department of Consumer and Worker Protection for taking action to protect citizens and businesses from unsafe and untested products. We believe this endeavor aligns with our shared goals of promoting consumer safety and advancing sustainable transportation solutions.

Yours sincerely,

John Munhall  
Director of Bicycle Product

Allen Needle  
Risk Manager