



Oct 16th, 2023

From: Matias Alvarez – Chief Operations Officer Blaupunkt Americas

RE: Argument Against Accepting International Laboratories for Powered Mobility Devices in NYC:

As COO of Blaupunkt Americas, I echo the sentiment of my colleague, Brian Tedesco on the proposal of allowing *“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”* is deeply concerning and flawed. Here’s why:

Having spent more than a decade in the cycling industry in different roles, including directing smaller European ebike brands while entering the US market, it is crucial to maintain safety and quality standards for emobility devices by requiring the use of Nationally Recognized Testing Laboratories before product is distributed within the US. Having worked closely with manufacturers over the last few years, it has become an issue of concern when new brands enter the market with product which has not been evaluated by NRTL’s. Many of the smaller brands which have entered the market and exited within 18 months failed due to untested electronic components, primarily batteries and wiring harnesses, although they were evaluated by their local international laboratories. These failures generated battery warranties, concerns for overcharging when depleted due to subpar engineering/design and use of alternate vendor components which did not meet UL standards. Lithium batteries are extremely sensitive to assembly and design, which can cause failures in various conditions.

A clear indicator of this concern is the volume of batteries which have been recycled by Call2Recycling since November 2021; as of September 2023, 43,000 pounds of lithium batteries have been recycled – many by manufacturers addressing failed batteries.

Local government and regulatory agencies must be focused on preserving the safety of this country’s residents and becoming the global leader in consumer confidence and safety, driving increased responsibility from the manufacturers to provide the safest product to our customers and their loved ones by requiring the use of NRTL’s prior to product distribution in their communities.

Sincerely

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