

Oct 4th, 2023

From: Brian Tedesco – President CEO Blaupunkt Americas

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

As President of Blaupunkt Americas a manufacture of consumer electronics products for over 60 years and father of 3-daughters that ride powered emobility devices daily this proposal to allow *“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:

1 Primary Regulatory Jurisdiction: The primary concern for consumer protection in New York City should be under the jurisdiction of nationally recognized U.S. regulatory bodies. Relying on standards set by OSHA, a nationally recognized body, ensures that the devices adhere to regulations that are tailored to the specific needs of American consumers, rather than broad international standards.

2 Tailored Safety Protocols: Nationally Recognized Testing Laboratories (NRTLs) have a comprehensive understanding of local safety protocols, standards, and potential risks specific to the U.S. and, by extension, NYC's unique environment. International standards, while rigorous, might not account for the specific urban dynamics and challenges of New York City.

3 Consumer Safety Risks: The high-density urban environment of NYC presents unique challenges for powered mobility devices, especially electric bicycles. Given the city's fast-paced traffic, frequent stops, variable weather conditions, and rough roads, electric bicycles and their lithium-ion battery packs must undergo rigorous testing. If brands opt for potentially cheaper testing facilities as described in sections (i) and (ii), this might result in lax safety protocols, thereby endangering NYC residents.

4 Dangers of Lithium-ion Batteries: E-bikes utilizing lithium-ion battery packs have the potential to be particularly hazardous if not adequately tested. These batteries can pose risks of overheating, fire, or even explosions if not manufactured or maintained to the highest standards. Given these risks, a testing body recognized at the national level is essential to ensure that every aspect of these battery packs is tested to rigorous standards.

5 Cost-Cutting at the Expense of Safety: If brands of e-bikes are allowed to co-opt cheaper testing facilities, they might cut corners in terms of safety to reduce expenses. This cost-saving move could jeopardize the safety of NYC consumers, subjecting them to products that have not been tested under stringent national safety regulations.

6 Accountability and Oversight: U.S. nationally recognized testing labs are directly accountable to U.S. regulatory bodies. In case of any discrepancies or issues, the direct line of accountability ensures that corrective actions

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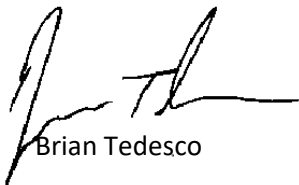
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can be taken swiftly. With international organizations, the chain of accountability is lengthened, possibly leading to delays or reduced effectiveness in addressing safety concerns.

7 Consumer Trust: Relying solely on nationally recognized testing laboratories fosters higher trust among consumers. Knowing that their powered mobility devices have been scrutinized by a laboratory directly overseen by a U.S. regulatory body gives consumers peace of mind.

In light of these arguments, while the intention behind the DCWP's proposal to include multiple testing avenues might be to increase accessibility and variety, it's crucial to prioritize the safety of NYC residents. By focusing on nationally recognized testing standards, New York City can ensure that all powered mobility devices, especially those with potentially hazardous components like lithium-ion batteries, meet the highest safety standards before reaching consumers. Lets move forward with e-powered devices safety.. not backwards.

Sincerely



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