



## UPWAY USA INC Public Comments on New York City Department of Consumer and Worker Protection Proposed Safety Standards for Powered Bicycles, PMDs and Batteries

Upway wishes to formally convey its comments to the New York City Department of Consumer and Worker Protection ("DCWP") in support of its proposed rule for the implementation of Local Law 39 of 2023. Additionally, Upway would like to submit certain supplementary amendments to the proposed text.

Upway is an enterprise committed to providing high-quality and secure two-wheel electric mobility solutions that are accessible and affordable to a wide-ranging demographic. Our primary objective is to establish a reliable secondary market characterized by expertise and robust warranties for the world's leading and safest e-bike brands. Our bicycles undergo meticulous assembly, certification, and/or repair processes, adhering rigorously to stringent safety protocols. Subsequently, we offer them for online purchase, featuring discounts off their retail prices.

As the largest secondary e-bike retailer in the country, Upway wholeheartedly supports the city's initiative aimed at fostering a safer e-bike market that prioritizes top-notch, dependable, and secure brands.

In accordance with the outlined proposal, we endorse DCWP's commitment to extending accreditation to certified ISO 17025 or ISO 17065 laboratories, or any Nationally Recognized Testing Laboratory. This definition enhances clarity for those subject to regulation while contributing to the establishment of a secure and dependable riding experience for all stakeholders. The mentioned accreditations represent a positive step towards ensuring the competency of testing laboratories in certifying compliance with applicable safety standards. Furthermore, these accreditations provide greater flexibility for regulated entities when selecting accredited laboratories. Upway encourages the consideration of additional accreditations, notably the European e-bike consensus standard, EN 15194, recognized as the safest accreditation in the EU, the world's largest e-bike market.

We extend our gratitude for considering our suggestions. We acknowledge the progress made and hope to see further enhancements, particularly with the inclusion of EN 15194, which can make two-wheel electric mobility even more accessible and safe. If you have any inquiries regarding our comments, please do not hesitate to contact us at [max@upway.shop](mailto:max@upway.shop).