



Commissioner Ydanis Rodriguez

New York City Department of Transportation
55 Water Street
New York, NY 10041

Re: Strong Opposition to Proposed E-Bike Speed Limit Rule (DOT-90)

Dear Commissioner Rodriguez,

On behalf of **Giant Group**, the largest bicycle manufacturer in the world, **Giant Bicycle, Inc.**, the US distributor of Giant, Liv, Momentum bicycles and E-bikes to over 1000 independent retailers across the US, and in NYC, and a proud advocate for safe and sustainable transportation, we write to express our **strong opposition** to the proposed amendment to Sections 4-01 and 4-06 of Title 34 of the Rules of the City of New York, which would impose a **blanket 15 mph speed limit** on electric bicycles and other micromobility devices.

This proposal is not just deeply flawed—it is a **damaging step backward** for New York City’s efforts to promote micromobility, reduce emissions, improve traffic congestion, and support transportation equity. It would impose **confusion, economic harm, and chaos** across the micromobility ecosystem in New York City, while ultimately **making the streets less safe, not more**.

A Terrible Policy That Undermines Progress

New York City should be a national and global leader in adopting smart micromobility solutions—not a cautionary tale of overregulation and missed opportunity. This rule would undercut the enormous progress the city has made in growing sustainable transportation options and limit its ability to adapt and thrive in a low-carbon future.

Rather than targeting the **real sources of traffic danger—cars, trucks, and unregulated mopeds**—this rule scapegoats the very riders and businesses who are contributing to a cleaner, more efficient, and more accessible urban transportation system.

The Rule Will Hurt Giant and the Broader Micromobility Industry

For Giant and our retail partners operating in New York City and across the country, this rule introduces major risks:

- **Consumer Confusion:** By contradicting existing state classifications and federal standards, this rule will leave consumers unsure of what products are legal to buy or ride. That confusion erodes trust in the entire category of e-bikes.
- **Damage to Retail and Dealer Networks:** Class 1, 2, and 3 e-bikes are already speed-limited by design to comply with federal and state law (20–28 mph). Forcing an artificial cap of 15 mph would devalue inventory, increase costs, and likely drive some retailers out of the city altogether.

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- **Inconsistent and Unenforceable Regulation:** No other major U.S. city has imposed a rule like this. It creates a regulatory patchwork, invites legal challenge, and lacks any meaningful enforcement mechanism.
- **Decreased Ridership and Mode Shift:** E-bikes are essential to helping people leave their cars behind. Slowing them down strips away the core value that makes them an attractive alternative. Slower bikes also create unsafe conditions in mixed traffic, increasing the risk of crashes—not reducing it.

Misguided Focus That Misses the Mark

This rule appears more symbolic than practical. If safety is the concern, focus should be on **infrastructure, education, and enforcement** of existing laws—not arbitrarily reducing the speed of legitimate, legal bikes that already comply with federal and state standards. The real safety threat lies with **unregistered mopeds and illegal e-motos**—not e-bikes sold by legitimate retailers and used by everyday New Yorkers, including essential workers.

A Better Path Forward

There are far more effective and equitable ways to promote safety and shared streets. These include:

- Updating the e-bike classification system to match federal and state laws;
- Implementing **targeted geofencing** in sensitive areas rather than a citywide speed cap;
- Lowering **all vehicle** speeds citywide to 20 mph under **Sammy's Law**;
- Expanding protected bike lane networks;
- Enforcing traffic laws on all road users—especially reckless drivers;
- Working with the industry to promote safe use, training, and public education.

Conclusion

The proposed 15 mph speed cap is a **reactionary policy** that threatens to derail New York City's momentum toward clean, efficient, and inclusive mobility. It will **harm businesses like Giant and our retail partners**, alienate consumers, and undermine the city's broader goals around transportation safety, climate, and equity.

We urge NYC DOT to **withdraw this proposal immediately** and instead work collaboratively with industry leaders like Giant, organizations like PeopleForBikes, local advocates, and delivery worker representatives to build a policy framework that enhances safety **without compromising innovation, progress, and economic vitality**.

Sincerely,

Chris Lai – Co-General Manager

Angelo Mascelli – Co-General Manager

John Munhall – Director of Product

Allen Needle – HR and Risk Manager

Giant Bicycle, USA

Giant Bicycle, Inc.