

July 26, 2024

**VIA E-MAIL AND U.S. MAIL**

Ms. Alberta E. Mills  
Secretary of the Commission  
U.S. Consumer Product Safety Commission  
4330 East-West Highway  
Bethesda, MD 20814  
[amills@cpsc.gov](mailto:amills@cpsc.gov)

Re: Petition for Rulemaking to Address Electrical Systems and Storage Batteries of Powered Mobility Devices and Electric Bicycles

Dear Chairman Hoehn-Saric:

The Consumer Technology Association (“CTA”) respectfully requests that the Consumer Product Safety Commission initiate a rulemaking proceeding to address electrical systems and storage batteries of powered mobility devices and electric bicycles. CTA’s Product Safety Working Group has drafted proposed regulatory text, which is attached to this letter as Attachment 1.

We are available to discuss this request at the Commission’s convenience.

Sincerely,

/s/ J. David Grossman

J. David Grossman  
Vice President, Policy & Regulatory Affairs

/s/ Dave Wilson

Dave Wilson  
Vice President, Technology & Standard

cc: Commissioner Douglas Dziak  
Commissioner Peter A. Feldman  
Commissioner Richard L. Trumka, Jr.  
Commissioner Mary T. Boyle  
Office of the Secretary  
Consumer Product Safety Commission  
Washington, DC 20814

## Attachment 1

### **Proposed certification standards for electrical system of electric bicycles:**

- (1) The electrical system of an electric bicycle shall be tested and certified by an accredited laboratory for compliance with Underwriters Laboratories Standard 2849; and
- (2) Confirmation of the testing and certification required pursuant to paragraph (1) of this subsection is displayed using a logo, wordmark, or name of the accredited laboratory:
  - (a) on packaging or documentation provided, to the consumer, at the time of sale, rental, lease, or other distribution of the electric bicycle thereto; or
  - (b) directly affixed to the electric bicycle or its battery.

### **Proposed certification standards for electrical system of powered mobility devices:**

- (1) the electrical system of the powered mobility device shall be tested and certified by an accredited laboratory for compliance with Underwriters Laboratories Standard 2272; and
- (2) Confirmation of the testing and certification required pursuant to paragraph (1) of this subsection is displayed using a logo, wordmark, or name of the accredited laboratory:
  - (a) on packaging or documentation provided to the consumer at the time of sale, rental, lease, or other distribution of the powered mobility device thereto; or
  - (b) directly affixed to the powered mobility device or its battery.

### **Proposed certification standards for storage batteries for electric bicycles:**

- (1) The storage battery shall be tested and certified by an accredited laboratory for compliance with Underwriters Laboratories Standard 2271 or 2580 or EN 50604, or the storage battery shall be part of an electrical system that has been tested and certified by an accredited laboratory for compliance with Underwriters Laboratories Standard 2849; and
- (2) Confirmation of the testing and certification required pursuant to paragraph (1) of this subsection is displayed using a logo, wordmark, or name of the accredited laboratory:
  - (a) on packaging or documentation provided to the consumer at the time of sale, rental, lease, or other distribution of the storage battery thereto; or
  - (b) directly affixed to the storage battery.

### **Proposed certification standards for storage batteries for powered mobility devices:**

- (1) The storage battery shall be tested and certified by an accredited laboratory for compliance with Underwriters Laboratories Standard 2271, or the storage battery shall be part of an electrical system that has been tested and certified by an accredited laboratory for compliance with Underwriters Laboratories Standard 2272, and
- (2) confirmation of the testing and certification required pursuant to paragraph (1) of this subsection is displayed using a logo, wordmark, or name of the accredited laboratory:
  - (a) on packaging or documentation provided to the consumer at the time of sale, rental, lease, or other distribution of the storage battery thereto; or
  - (b) directly affixed to the storage battery.

**Proposed Effective Date:** This rule shall apply to electrical system of electric bicycles, electrical system of powered mobility devices, batteries for electric bicycles, and batteries for powered mobility devices manufactured or imported after January 1, 2025.

Following definitions apply for the purposes of this regulation:

*Accredited Laboratory* means an independent laboratory that has been accredited by an approved third-party national or international accreditation body to fulfill the requirements for ISO/IEC 17065 and ISO/IEC 17025 or is an OSHA Nationally Recognized Testing Laboratory (NRTL) or Consumer Product Safety Commission (CPSC) accepted third party laboratory. The safety standards referenced in this ruling must be within the scope of accreditation of the accredited laboratory.

*Certified* means that an accredited laboratory has issued an Authorization To Mark or equivalent allowing use of its certification logo or mark confirming that the product has been certified to meet all applicable requirements from the safety standards required for the product under this Rule.

*Battery* means a rechargeable battery used as the primary traction battery for a vehicle that uses lithium ions as the primary component of its electrolyte.

*Electric Bicycle* means electric bicycle as defined in [15 CFR § 1512.2\(a\)\(2\)](#).

*Powered Mobility Device* means a consumer mobility device with a rechargeable electric drive train that balances and propels the rider, and which may be provided with a handle for grasping while riding. This device may or may not be self-balancing. "Powered mobility device" does not include electric bicycles, wheelchairs, or other mobility devices designed for use by persons with disabilities, a vehicle that is powered by an internal combustion engine, or a vehicle required to be registered with the Department of Motor Vehicles.