

August 24, 2026

**Comments of Courtney Griffin, Director of Consumer Product Safety
Consumer Federation of America
Before the U.S. Consumer Product Safety Commission
Safety Standard for Lithium-Ion Batteries Used in Micromobility Products and Electrical
Systems of Micromobility Products Containing Such Batteries
[CPSC Docket No. CPSC-2025-0012]**

Consumer Federation of America (CFA) is an association of over 200 national, state, and local consumer groups that was founded in 1968 to advance the consumer interest through research, advocacy, and education. For over 50 years, CFA has been at the forefront of ensuring that the marketplace is fair and safe. Consistent with this work, CFA has long advocated for a strong, effective Consumer Product Safety Commission (CPSC).

As the CPSC data clearly demonstrate, micromobility electrical systems, user replaceable battery packs sold separately from a micromobility product, aftermarket battery chargers sold separately from a micromobility product, and components for eBike conversion kits, present an unreasonable risk of injury and death to consumers from electric shock, fires, explosions, expulsion of gas or flames, burns, overheating, and smoke inhalation when not compliant with the proposed rule. The degree and nature of the risk of injury associated with these products are incredibly concerning. In towns and cities across the country, the number of fires and fire fatalities associated with lithium-ion batteries and micromobility products increased substantially over recent years. Some jurisdictions, particularly New York City and New York, have taken significant steps to reduce and mitigate the risks; however, a strong CPSC rule and robust enforcement are needed to protect Americans from this threat.

To address the unreasonable risk of injury associated with lithium-ion batteries used in micromobility products and their electric systems, CFA supports the proposed rule, which will adopt with modifications: ANSI/CAN/UL 2849:2020, *Standard for Safety for Electrical Systems for eBikes* (UL 2849-20) (eBikes); ANSI/CAN/UL 2272:2024, *Standard for Safety for Electrical Systems for Personal E-Mobility Devices* (UL 2272-24) (eScooters, eSBscooters, eSkateboards, eUnicycles, and hybrid products, collectively “other micromobility products,” or “personal eMobility products”; and ANSI/CAN/UL/ULC 2271:2023, *Standard for Safety for Batteries for Use in Light Electric Vehicle (LEV) Applications* (UL 2271-23) (user replaceable battery packs).

While CFA strongly supports the proposed rule, and extends our gratitude for CPSC’s work on the same, we have the following comments to improve the proposed rule’s clarity and impact:

1) Definitions and scope

The scope of the rule must be sufficiently broad to capture all relevant micromobility devices. We therefore urge CPSC to ensure that the rule does not create a regulatory gap for products that do not fall within the scopes of UL 2272 or UL 2849.

Further, the current rule’s e-bike definition is too vague. Under federal law, low-speed electric bicycles have a specific definition. However, in the marketplace, e-motos or e-motorcycles are

being marketed as “e-bikes” and being used by minors, creating enormous safety risks.¹ Does CPSC’s proposed rule cover these products? The answer seems unclear and therefore creates regulatory ambiguity, as well as lots of risks for consumers.

2) **Conversion Kits**

The CPSC should investigate whether the proposed rule fails to address safety concerns related to conversion kits, which essentially allow a consumer to turn bicycles into overpowered e-bikes, e-motos, or other vehicles that were never designed or tested for safety. Conversion kits create a variety of safety issues, even beyond electric risk. This rule does not address that non-electric risk but does seem to legitimize such products.

We again extend our gratitude to CPSC staff for their diligent work on this rule. We urge the Commission to promptly finalize a rule to improve consumer safety, and we also respectfully urge the Commission to enforce the rule using all the tools available to it.

Respectfully,

Courtney E. Griffin, Director of Consumer Product Safety
Consumer Federation of America

¹ Josh Ellerbrock, The New “Wild West” of E-Motos; Getting Wheels Got Cheaper. Teens Took Notice., *St. Albans Messenger* (Aug. 20, 2026), https://www.samessenger.com/news/the-new-wild-west-of-e-motos-getting-wheels-got-cheaper-teens-took-notice/article_2ad67621-5b0f-4fac-b690-28be98eca512.html; Claire Cleary, *E-Motos Are on the Rise in SLO County. Here’s Why They’re Riskier Than Regular E-Bikes*, *San Luis Obispo Trib.* (Aug. 23, 2026), <https://www.sanluisobispo.com/news/local/article316700405.html>; John McMahon, *Back-to-School Safety Concerns Include Electric Rides in Winooski*, *WCAX* (Aug. 24, 2026), <https://www.wcax.com/2026/08/24/back-to-school-safety-concerns-include-electric-rides-winooski/>.