



July 24, 2023

Office of the Secretary  
Consumer Product Safety Commission  
4330 East West Highway, Room 820  
Bethesda, MD 20814

Submitted via [www.regulations.gov](http://www.regulations.gov)

**Comments of Consumer Federation of America and Kids In Danger to the Consumer Product Safety Commission on the Petition to Revoke the Footbrake Requirement for Sidewalk Bicycles (CPSC-2023-0023)**

**Introduction**

Consumer Federation of America (CFA) and Kids In Danger (KID) submit the following comments in response to the U.S. Consumer Product Safety Commission (“CPSC” or “Commission”)’s request for comments in the above-referenced matter.<sup>1</sup>

On September 21, 2022, Don Mays of Product Safety Insights, LLC on behalf of woom (a manufacturer of children's bicycles), petitioned the Commission to initiate rulemaking to eliminate the footbrake requirement for sidewalk bicycles in 16 CFR 1512.5(e). The CPSC has requested comments on the petition and in addition, seeks comments on the adequacy of requirements for bicycles in the Commission's rules, including electric bicycles.

**Recommendations**

Our organizations reviewed the petition and addendum. The provided information will allow the CPSC to review the issue to determine whether to take action. Our organizations do not see any obvious safety ramifications in granting the petition addressing the brake issue on sidewalk bicycles but urge the CPSC to seek additional data pertaining to injuries due to sidewalk bicycles with or without footbrakes as it appears many are currently on the market and in use in the US as well as in Europe. Our organizations believe that footbrakes should still be an option for any manufacturer who wants to add them or sell aftermarket kits to retrofit their bicycles.

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<sup>1</sup>Petition to Revoke the Footbrake Requirement for Sidewalk Bicycles, <https://www.regulations.gov/document/CPSC-2023-0023-0001> (May 24, 2023).

On the additional question of updating the mandatory standard for both standard bicycles and electric bicycles, KID and CFA support this action. For children's bicycles or sidewalk bicycles, the standard has not been updated since 1973 and for all bicycles, the standard lags behind general practice and voluntary standards. A rash of fires caused by electric bicycle battery charging also speaks to the need to strengthen standards both on the batteries and safety of the electric bicycles.

Respectfully submitted,  
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Kids In Danger is a nonprofit organization dedicated to protecting children by improving children's product safety.

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Consumer Federation of America (CFA) is an association of more than 250 non-profit consumer organizations that was established in 1968 to advance the consumer interest through research, advocacy, and education.