



August 21, 2023

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

Submitted via Regulations.gov

Re: Lithium-Ion Battery Safety; Notice of Meeting and Request for Comments

Docket No. CPSC–2023–0025

Dear Chair Hoehn-Saric and Commissioners Boyle, Feldman, and Trumka,

Please accept this comment in response to the Consumer Product Safety Commission's (CPSC) request for comments concerning the safety of lithium-ion batteries used in electric bicycles and other micromobility devices. We encourage the CPSC to create new safety standards in relation to these batteries to improve their safety and protect against risks to consumers.

DoorDash is a technology company that connects consumers with their favorite local businesses in more than 25 countries across the globe. Founded in 2013, DoorDash builds products and services to help businesses innovate, grow, and reach more customers. DoorDash is building infrastructure for local commerce, enabling merchants to thrive in the convenience economy, giving consumers access to more of their communities, and providing work that empowers. With DoorDash, there is a neighborhood of good in every order.

Electrically-powered micromobility is a crucial component of transportation in the U.S., particularly for more urban areas. It offers substantial benefits to U.S communities, workers, and citizens as people take advantage of mobility options that reduce emissions, save space, and mitigate congestion.¹ Moreover, electric bicycles provide the additional benefit of enabling the rider to be active and get exercise, promoting physical and mental health.² Policies in the U.S. should support the adoption of these technologies to realize these benefits.

At DoorDash, we see electric bicycles and electric micromobility as a key way to reduce carbon emissions and make deliveries more efficient. For the Americans who use the DoorDash

¹ [Electric Bikes Statistics, Academic Research, PeopleForBikes](#) (Collecting academic studies regarding climate and transportation benefits of electric bicycles).

² [Riding Electric Bicycles Boon To Health And Not Cheating, Confirms Literature Review, Forbes \(Nov. 23, 2018\)](#); [The Health Benefit of Electric Bicycles, PeopleForBikes \(Apr. 28, 2022\)](#).



platform to make deliveries - called Dashers - these devices can be a valuable and affordable tool to earn supplemental income.

Unfortunately, recent fires in New York City have highlighted the dangers posed by the lack of battery safety standards for devices powered by lithium-ion batteries. We believe it is time to set clear battery safety requirements that prevent these fires. The absence of these standards is particularly important for food delivery workers, many of who own these devices and use them to earn extra income.

A safety floor must be put in place to ensure that products with unsafe batteries do not enter the marketplace. A consumer should not need to analyze complex engineering standards to determine whether they are buying a safe product. The absence of safety standards also makes it easy for consumers to unknowingly purchase dangerous items, and unsafe batteries are often attractive due to the artificially low cost that accompanies them not being tested or certified. Products that cannot meet standards that adequately protect against the risk of fires should not be manufactured, imported into, or sold in the U.S. Shutting down the flow of unsafe batteries will help make families across the country safer.

DoorDash has partnered with electric bicycle suppliers to expand access to affordable, safe e-bikes so that Dashers have more transit options. These partnerships give Dashers an option to purchase safe, discounted electric bicycles from reputable manufacturers and expand access to electric bicycle rentals. We've also helped educate Dashers and others in the communities we serve about safe e-bike practices, including contributing \$100,000 to the FDNY Foundation's e-bike and battery safety education campaign. We continue to develop new partnerships that make it easy and affordable to obtain safe mobility devices like e-bikes, and keep Dashers informed of best practices in battery safety.

While we're proud of the work we're doing to give Dashers more access to safe, reliable e-bikes, we unfortunately can't stop the flow of unsafe or uncertified products into the U.S. Americans may be drawn to these products for a number of reasons, whether it be cost, easy availability, or a misunderstanding of the product's certification status. We believe that new federal requirements will materially improve safety by ensuring that all options, at a minimum, protect against the risk of fires or other harms. Dangerous batteries simply shouldn't be equipped on any vehicle.

We believe a clearly defined safety standard for electric bicycle and e-mobility device batteries would provide substantial benefits and help prevent unsafe products from entering the marketplace. It will likely be easier to police imports and retail sales by setting a well-understood standard that manufacturers and importers can document, and retailers and distributors can verify. We encourage the CPSC to work closely with electric bicycle and micromobility device manufacturers to identify standards that protect consumers while still ensuring that the benefits of these products can be fully realized.



We note that we also support H.R. 1797/S.1008, the “Setting Consumer Standards for Lithium-Ion Batteries Act.” The U.S. must ensure that every micromobility device powered by these batteries is safe for the consumer. We would encourage the CPSC to adopt standards for all mobility devices over which it has jurisdiction to ensure that other types of vehicles are also safe for consumers to purchase.

Thank you for accepting comments on this important issue, and we hope you will move forward with new battery safety standards. As new standards are being developed, we will continue to pursue partnerships and investments that help make safe, certified products more readily available to Dashers, and help inform them about best practices in battery safety to prevent fires.

Sincerely,

A handwritten signature in black ink that reads "Carrianna S Kuruvilla".

Carrianna Suiter Kuruvilla
Head of Federal Government Relations
DoorDash

CC: Toney Anaya
Head of Global Government Relations
DoorDash