February 5, 2020

Mr. David Dick
Subcommittee Chairman for ASTM F15.58, Powered Scooters & Skateboards
c/o ASTM International
100 Barr Harbor Drive
P.O. Box C700
West Conshohocken, PA 19428-2959

Dear Mr. Dick:

On November 5, 2019, U.S. Consumer Product Safety Commission (CPSC) staff participated in the ASTM F15.58 subcommittee meeting on powered scooters and skateboards.\(^1\) Staff is aware that ASTM has since initiated work item WK 70724, *New Specification for Commercial Electric-Powered Scooters for Adults*, to develop performance requirements specific to commercial electric-powered scooters (e-scooters) for use in ride-sharing applications.

CPSC staff supports this effort and is providing the subcommittee with the attached incident data related to ride-share e-scooters to help the working group identify hazards that are specific to this new product. The incident data describe crash and/or fall hazards due to brake failures, system and/or power loss, and structural failures. Additionally, there are fire hazards described in the incidents as thermal events. Staff would like ASTM to consider addressing the following topics for the new standard:

- Brake failures
- Electrical and thermal related events
- Software issues
- Durability (fatigue testing)
- Dynamic and static load testing
- Environmental conditions
- Warning labels and instructions

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\(^1\) The views in this letter are those of the staff and have not been reviewed or approved by, and may not reflect the views of, the Commission.
CPSC staff appreciates your attention to this matter, and looks forward to working with the ASTM F15.58 subcommittee to develop a new standard to address the hazards that are specific to this new class of commercial e-scooter. Please feel free to contact me if you have any questions or need additional information.

Sincerely,

Lawrence Mella
Mechanical Engineer

CC: Patricia Edwards, CPSC Voluntary Standards Coordinator
    Molly Lynyak, ASTM International