



U.S. CONSUMER PRODUCT SAFETY COMMISSION  
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December 20, 2016

Ms. Laurie Florence  
UL 2272 Principal Engineer  
Underwriters Laboratories Inc.  
333 Pfingsten Road  
Northbrook, IL 60062-2096

Re: Request for Comments on Proposed Effective Date for New and/or Revised Requirements for UL 2272

Dear Ms. Florence:

U.S. Consumer Product Safety Commission (CPSC) staff appreciates this opportunity to provide comments on the proposed effective date for changes to UL 2272, *Standard for Electrical Systems for Personal E-Mobility Devices*.<sup>1</sup> CPSC staff strongly supports the requirements in UL 2272 to address hazards associated with lithium-ion batteries in self-balancing scooters and other similar devices. As such, we view the earliest possible integration of these design features into products as an important step.

Staff fully supports certification to UL's Outline of Investigation to address the more than 100 self-balancing scooter fires in more than 20 states. These fires have resulted in several million dollars in property damage in the last 12 months. Additionally, staff believes that certification to the newly approved bi-national consensus standard, with its revisions to the Outline, is essential to ensuring that more robust safety practices are being followed. However, staff believes that meeting these new requirements should only require incremental changes to existing compliant designs. Therefore, staff opines that the proposed 24-month effective date is too long. Staff believes that an effective date of July 31, 2017 provides adequate time for manufacturers to make changes and certify products to the new requirements.

Again, thank you for this opportunity to provide comments. If you have any questions, or need additional information, please feel free to contact me.

Sincerely,

  
Douglas Lee

cc: Patricia Edwards, CPSC Voluntary Standards Coordinator

<sup>1</sup> The comments or views expressed in this letter are those of the CPSC staff and have not been reviewed or approved by, and may not reflect the views of, the Commission.