



August 25, 2026

Ms. Alberta Mills
Secretary, Office of the Secretary
Consumer Product Safety Commission
4330 East-West Highway
Bethesda, MD 20814

Re: CPSC NPRM on Safety Standard for Lithium-Ion Batteries Used in Micromobility Products and Electrical Systems of Micromobility Products Containing Such Batter-ies

Docket No. CPSC-2025-0012,16 CFR Parts 1112 and 1265

Dear Secretary Mills:

The NAATBatt Battery Safety Committee represents many of the nearly 400 member organizations of North American Advanced Technology Battery (NAATBATT) International, the leading trade association in North America focused on advancing the development, commercialization, and manufacturing of advanced battery and electrochemical energy storage technologies.

The NAATBatt Battery Safety Committee (BSC) fully supports the Commission's proposal to establish mandatory federal safety standards for lithium-ion batteries used in micromobility products and related standards for the micromobility products containing such batteries.

The field of battery safety is evolving and informed by field incidents, as demonstrated by the CPSC nprm reference material on incident outcome frequency and severity. NAATBatt BSC suggests that CPSC investigate development and deployment of a micromobility incident tracking database, similar to the battery incident database utilized by the FAA (https://www.faa.gov/hazmat/resources/lithium_batteries/incidents) to track battery field incidents that inform policy and improve outcomes. as well as the BESS incident database maintained by the Electric Power Research Institute on large scale battery energy storage incidents. <https://energystorage.epri.com/hub/public/en/failure-incident-database.html> it is also suggested that the incident database receives routine and periodic review of data

for trends that may indicate the need to evolve voluntary standards or regulatory framework.

In addition to the NPRM proposed modifications to UL 2271-23, the NAATBatt BSC recommends the expansion of the applicability threshold for UL2271-23 to **include battery systems less than 1kWh for any device designed to propel a person or persons**. Many e-scooter and micromobility battery ratings routinely range between 300Wh and 800Wh, and in a number of cases, may include designs that incorporate multiple separate battery units rated at lower energy levels whose combined energy and hazard may exceed the 1kWh threshold.

Additionally, the NAATBatt BSC suggests that CPSC encourage manufacturers to strive to produce designs **that inhibit rapid escalation of events through use of passive propagation resistance (PPR) features**, meaning that any single cell venting or thermal runaway failure cannot drive a cascade failure to force additional cells to engage in venting /thermal runaway. This has been demonstrated to be achievable with minimal impact to cell or system design in a number of applications, and has been supported by data generated by NHTSA in support of FMVSS305A as well as other similar applications.

Lastly, NAATBatt BSC encourages CPSC to review the latest Chinese micromobility standard GB 17761-2024 (Safety Technical Specification for Electric Bicycle), as elements of the GB 17761-2024 may be informative to the development of CPSC requirements and have demonstrated through 2025-26 incident tracking to substantially reduce the incidence and severity of battery failure in micromobility devices where the GB-17761-2024 has been required.

We will be happy to work with CPSC, UL, and related parties to improve micromobility safety throughout the United States. Please feel free to contact us at any time with questions or concerns regarding these suggestions.

Yours in safety,

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