

Elevator Code Adoption

Public Comment- Nov 12, 2019

City of Philadelphia-Dept of Licenses and Inspections

My name is Elizabeth Baldwin and I am the Chief Code Official for the City of Philadelphia, Department of Licenses and Inspections. The Department of Licenses and Inspections supports the adoption of ASME A17.1 2016 and recommends that regulations be expanded to include relevant accessibility provisions of the International Building Code and ICC A117.1. The current regulation requires a separate review, permit, and inspection by the local jurisdiction to confirm that the elevator or lifting device meets accessibility provisions. We recommend that the Department of Labor and Industry incorporate accessibility provisions that address dimensions and controls into the permitting process. A single authority will streamline the process, shorten the overall review time, and eliminate the duplication of work.

I am also here to share comment from the Mayor's Office. The Mayor's Office of Labor Relations is not supportive of the alternate testing method proposed in the new code. Alternative testing is not actual testing. The manufacturers want to use alternative methods of testing that predict the results. Alternative predictive testing could increase the dangers to the riding public as elevators would be tested without using real life conditions (i.e. test weights).

Thank you for this opportunity to provide feedback