

Pennsylvania Public Comment Hearing

November 12th 2019

Jack Koch

Good morning to everyone, my name is Jack Koch. I am here today to provide comments so that I might help you perform your duty to protect the people who live, work and visit our great state.

Copies have been provided as directed. If you require an electronic version let me know and I'll be happy to forward it to the board.

I live in Philadelphia and have been an Elevator Constructor, and a member of the International Union of Elevator Constructors for over 35 years. I have performed as a trained mechanic for over 30 years in every aspect of this trade.

During my career I have worked as an Instructor for the National Elevator Industry Education Program thereby ensuring that

qualified people install, service and modernize our conveyances.

Currently I serve as a Business Representative for IUEC Local 5, supporting over 700 elevator constructors who will install, service, modernize and test the conveyances that transport our family's each day.

In addition to the many things I am tasked with, I know our goal is to make the industry safer. That is why I also sit on the OSHA Best Practices Committee and the IUEC Local 5 Safety Committee.

Whether working on or simply riding or using the equipment, everyone has to be provided with safe regulatory language that's enforceable. Today my comments are for just that. I am speaking to you on behalf of the riding public and all affected

employees. Thank you in advance for your consideration and effort.

Comment 1

Tracie can you play the video. I would like it to be viewed before I read my comments.

In our industry an elevator constructor dies every 70 days statistically primarily due to one of the OSHA defined Focus Four Hazards of struck by, caught between, falls or electrocution.

Efforts to mitigate this fatal result is to establish any protection regardless of where it falls on the hierarchy to prevent an affected person from being in the path of moving equipment.

The video I brought for you to view illustrates the power of the conveyance we are discussing and to support my recommendation.

This video is shown to convey the message to affected employees and the enforcers of the applicable codes that despite physical barriers the travel path of equipment or a conveyance may not be what is expected.

Always consider how far a piece of equipment may move as you perform any activity in proximity to that equipment.

What is seen here is what appears to be a car buffer being engaged followed quickly by a counterweight smashing through an elevator secondary. I have also submitted pictures to the board that show the after affects of an elevator smashing through the machine room floor.

Everything in the travel path of an elevator may not withstand the forces delivered which may become a lethal hazard.

The edition of of A17.1 being considered for adoption allows an engineering method that would put persons in the path of equipment thereby engineering a hazard that should be prohibited.

Please delete language in A17.1-2016, 2.7.5.4 which allows working platforms in the path a car or counterweight and any related language allowing any installation to have equipment or structure that would service and test an elevator while putting affected persons in harms way.

Comment 2

With regard to any elevator being granted a certificate of operation in compliance with ASME A17.1-2016, section 5.10 Elevators Used for Construction or what is generally referred to across the United States as a temporary permit.

We utilize this routinely in The State of Pennsylvania on construction, demolition and modernization job sites. Compliance with ASME A17.1-2016 is important and I would like to clarify these elevators and the site conditions are not conducive to safe public use.

There use is restricted to construction or demolition to provide transportation for construction personnel, tools, and materials only.

Until full compliance with ASME A17.1 part 2 or 3 is achieved they are not accessible to the general public.

These elevators in this configuration should only be permitted to operate by having an attendant whom meets the definition of elevator personnel as modified by Mr. Whymeyers testimony.

Elevator manufacturing, buildings owners and any persons invested in the safe care of both the equipment and persons using it have expressed the need to ensure these are restricted to code allowances and that an attendant be qualified to ensure the safe loading, use and unloading of this conveyance type.









