

To the Pennsylvania Elevator Safety Board:

My name is Jim Chapman and I am here today to provide comments prior to the adoption A17.1-2016. I am an Elevator Constructor Mechanic who has worked in all phases of the elevator industry. I have worked new construction, modernization, maintenance, repair, and testing. I would like to express my concerns about alternative testing that is in ASME A17.1-2016/CSA B44-16.

We have always done testing using straight forward methods and always used qualified personnel. Our goal is to follow these methods and eliminate hazards to the riding public. Those who sell alternative testing technology require a baseline during the final acceptance test using weights. There are no requirements in A17.1 to use weights to set the baseline, only a note. Notes are not requirements and can't be enforced.

Proponents of alternative testing claim their methods reduce wear and tear on equipment. This is true, but only because alternative tests do not require the equipment to be tested. Alternative testing may save wear and tear but will create a problem where equipment can fail catastrophically while carrying passengers. We, as part of the elevator industry do not want equipment to fail or breakdown during a weighted test. However, it is better to have a failure during a weighted test than to have a failure with the riding public. Each year there are fatalities that occur for multiple reasons. We need expand our testing methods do not reduce them.

Alternative testing does not accurately simulate an elevator in an overload condition. Elevators that use belt as its suspension source are also area of concern for alternative testing. Belts have caught fire, lost traction at contract speed and while stopped. Alternative test does not create a method to effectively test these conditions.

Alternative testing does not use weight to test an elevator but uses wireless devices for testing. These devices have been known to fail and caused unintended motion. This method is not safe or accurate. Unless additional requirements are developed, alternative testing cannot replace actual weight testing. Any consideration to use electronic devices to measure how level something is not reliable. No standard ensures these devices are calibrated. Alternative testing will decrease the oversight provided by an AHJ.

Manufactures claim alternative testing and the use of electronic devices reduces cost. They fail to tell you that persons using the equipment would be required to be trained and certified to use this equipment. This would increase cost, and, in some cases, it may violate local laws on the use of the equipment.

I respectfully request that the Pennsylvania Elevator Safety Board delete the following in ASME A17.1-2016/CSA B44-16:

- 8.6.4.20.1(b)
- References to 8.6.11.10 in 8.6.4.20.3(-a)
- References to 8.6.11.10 in 8.6.4.20.3(-b)
- References to 8.6.11.10 in 8.6.4.20.3(f)
- 8.6.4.20.4(b)
- 8.6.4.20.10(b)
- 8.6.11.10 and its subordinate requirements
- The note referencing 8.6.11.10 in the parent paragraph in Section 8.10

Sincerely,

James H. Chapman III
IUEC Regional Director
Email: jchapman@iuec.org
Phone: 816-719-0585