



# NEII

NATIONAL ELEVATOR INDUSTRY, INC.

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SETTING STANDARDS IN MOTION

November 12, 2019

Members of Elevator Safety Board:

My name is Norman Martin. I am currently the Codes and Standards Officer with Schindler Elevator Corporation. Some of you may recognize from me from my time as the Chief Elevator Inspector for the State of Ohio, a position from which I retired after 30 years of service. In my current role, I interface with various Authorities Having Jurisdiction (“AHJs”) across the United States and Canada on elevator regulations and code updates.

Schindler is a member of the National Elevator Industry, Inc. or NEII, the national trade association that represents the major elevator manufacturers among others. Collectively, NEII member companies account for approximately 85% of the total work hours in the industry and all have a large footprint here in Pennsylvania.

My remarks today are on behalf of NEII but draw heavily from my three decades experience directly overseeing a State elevator program.

I am here to urge Pennsylvania to adopt the latest edition of ASME A17.1 *Safety Code for Elevator and Escalators* (“A17”) **without deviation**. Updating to the newest version of a code is the most effective way to enhance the safety of the riding public and elevator personnel.

A17 is developed through a consensus committee process that engages experts from all industry interest groups including engineers, building owners, organized labor, inspectors, design experts and enforcement authorities. For example, committees use hazard assessments to evaluate potential safety risks of any changes, task groups are formed to tackle specific provisions and significant public input period is provided to ensure input from end users. Each of these components functions as a single pillar to the ANSI-approved code development process. Together these pillars ensure that the A17 code is thoroughly vetted before its implementation into jurisdictions.

The model Elevator Code is updated on a three-year cycle as a way for the latest technologies and newest safety enhancements to be incorporated into the model industry standards.

Pennsylvania currently operates under the 2000 version of A17, as amended in 2002, making it nearly twenty years out of date. There have been 5 editions of the code, as well as 5 addendums, published since Pennsylvania last updated its codes. Notably, the next edition of the code, A17 2019, is expected to be published before the end of this year.

Such an outdated code requires elevator manufacturers and contractors to seek variances in order to install the latest technologies – a process that is unnecessarily burdensome and costly given that this equipment is widely in operation around the country and already complies with more recent iterations

of the code. In essence, unless the installed equipment predates 2002, there is an extra step to the construction process that has already shown to delay critical new development projects in Pennsylvania. Not to mention, there have been dozens of significant safety improvements made to A17 since 2002 that benefit the Commonwealth's mechanics, passengers and inspectors.

Here are just a few examples of the noteworthy improvements made to the code since 2002:

- Added requirements for hoistway access switch location, Phase I recall operation with closed hoistway doors, escalator braking distance monitor, and requirements for elevators not in automatic operation.
- Updated requirements for existing elevators and alterations.
- Reduced hoistway door-to-car-door clearances on private residence elevators and added car door deflection and strength criteria.
- Expanded Maintenance Control Program provisions to improve the quality of on-site documentation.
- Creation and expansion of the alternative testing provisions to reduce the most common workplace injuries.
- Improved door restriction requirements, including the recognition of electronic door restrictors and a reduction of the door unlocking zone.
- Added design, retention and guarding requirements in addition to updating provisions to incorporate alternate suspension means by referencing a new standard, A17.6 Standard for Elevator Suspension, Compensation, and Governor Systems.
- Added traction lost detection, residual strength monitoring, broken rope monitoring, and engineering testing for various types of suspension means.
- Created definitions and requirements for machine room less elevators (MRL), machinery spaces, controls spaces and control rooms.
- Developed requirements for dynamic skirt panels on escalators.
- Updated Firefighters' Emergency Operation and Emergency Communications requirements
- Some local conditions such as extreme weather may warrant minor modifications to the A17 model code, but most jurisdictions adopt with no changes at all. In fact, twenty-nine states adopt A17.1

without any changes and only six states make more than ten.

We strongly recommend against this body proposing changes to the model Elevator Code. Each provision of A17 is thoroughly cross-referenced with other codes to ensure harmonization. As a result, making amendments now has the potential to create conflicts with the fire, building, electrical and/or other codes. NEII encourages this committee to require strong empirical data or other supporting evidence before even consideration of any deviations from the A17 model Elevator Code.

Before concluding my remarks and taking questions, I also want to be on record in support of the full adoption of ASME A17.3, Safety Code for Existing Elevators and Escalators. I recognize that Pennsylvania currently does not recognize this model code, but I strongly urge this committee to examine creative, inexpensive ways to include the most critical safety provisions of A17.3 during the upcoming code process. Updating the code for **new** installations is a significant improvement, but it is also incumbent on this committee to adopt standards that will provide safety improvements for the Commonwealth's **existing** stock of elevators.

In conclusion, I want to reiterate the importance of adopting the most recent edition of the A17 model Elevator Code in order to improve safety and cut regulatory yellow tape. There is no reason for Pennsylvania to continue lagging behind the rest of the country with one of the most outdated codes. NEII is committed to supporting this board throughout the code adoption process by providing any requested technical support or training information.

Thank you for the opportunity to testify today and I look forward to answering any of your questions.