

MASLOW'S HIERARCHY OF NEEDS

ABRAHAM MASLOW



MORALITY, CREATIVITY, SPONTANEITY, PROBLEM SOLVING, LACK OF PREJUDICE, ACCEPTANCE OF FACTS

SELF-ACTUALIZATION

SELF-ESTEEM, CONFIDENCE, ACHIEVEMENT, RESPECT OF OTHERS, RESPECT BY OTHERS

ESTEEM

FRIENDSHIP, FAMILY, SEXUAL INTIMACY

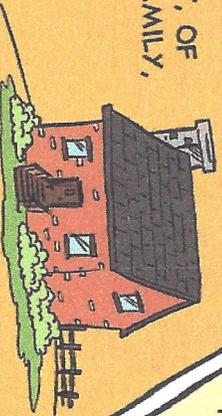
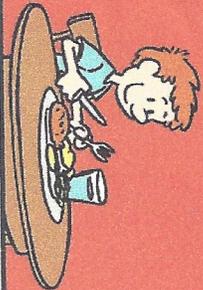
LOVE/BELONGING

SECURITY OF BODY, OF EMPLOYMENT, OF RESOURCES, OF MORALITY, OF THE FAMILY, OF HEALTH, OF PROPERTY

SAFETY

BREATHING, FOOD, WATER, SEX, SLEEP, HOMEOSTASIS, EXCRETION

PHYSIOLOGICAL



Abraham Harold Maslow (April 1, 1908 - June 8, 1970) was a psychologist who studied positive human qualities and the lives of exemplary people. In 1954, Maslow created the Hierarchy of Human Needs and expressed his theories in his book, *Motivation and Personality*.

Self-Actualization - A person's motivation to reach his or her full potential. As shown in Maslow's Hierarchy of Needs, a person's basic needs must be met before self-actualization can be achieved.

*Q. Scott Hulstrom
11/2/19*

BEST

ELIMINATION

Design It Out

SUBSTITUTION

Use Something Else

ENGINEERING CONTROLS

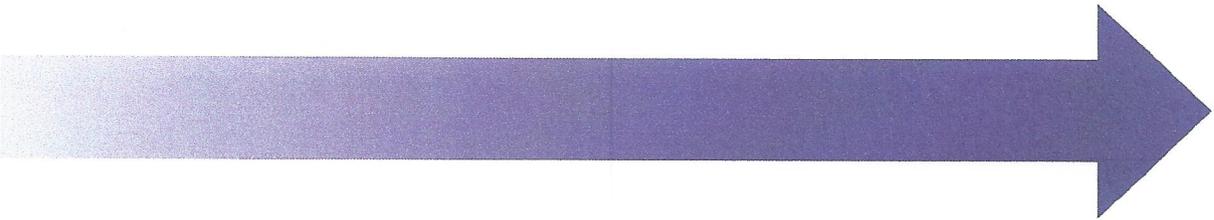
Isolation and Guarding

ADMINISTRATIVE CONTROLS

Training and Work Scheduling

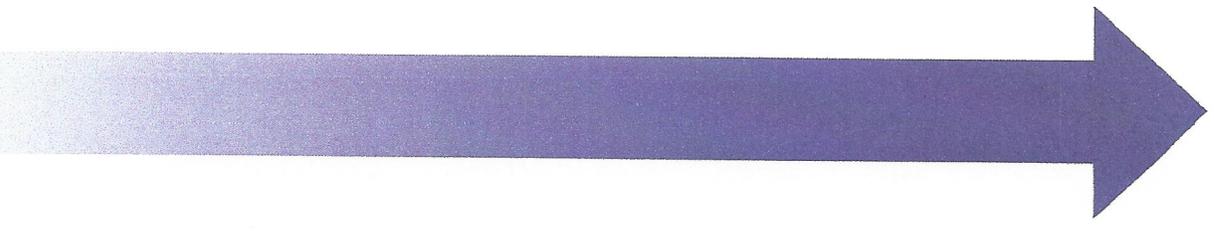
PERSONAL PROTECTIVE EQUIPMENT

Last Resort



BEST

*R.S. Hoffstrom
11/23/19*



Control

Effectiveness

Business

Value



R. Scott Hultstrom
11/23/19

Greetings,

As an interested party I am submitting the below comment as per your direction. My intention is to provide supportive assistance in your efforts to protect the members of your communities. Thank you in advance for your consideration and effort.

I have provided material that explains who I am, the changes I seek initially and a substantive list you most likely have not reviewed and are about to dangerously approve. Stop me if you have a question.

Comments regarding ASME A17.1-2016/CSA B44-16:

Prior to comments. Although not included in the handout provided, I am commenting to advocate for all information inclusive of handouts to be accessible to all who request it so as to increase collaboration for a safer industry. See and hear the record produced by Judy Valencik to gather what I stated. Make this part of the minutes and record of comment to be acted upon.

1. Section 1.3 Definitions, sound engineering revise as follows:

sound engineering practice: the use of engineering or technical methods founded and employed based on safe engineering to ~~design-recognize needs, hazards, and or-evaluate~~ evaluate a device or system its components, materials as well as its application by taking into account relevant factors that may influence its potential hazards, hierarchy of hazard control, efficacy & operation. This practice also involves the use of applicable standards, specifications, codes, ~~&~~ regulatory & industry guidelines, providing the criteria as well as ~~accepted-~~ safe engineering, ~~&~~ design methods, ~~&~~ installation & maintenance practices.

Rationale: To ensure a safety code provides consistency in its language indicating understanding, recognition, acceptance and utilization of safety codes and standards such as OSHA's Recommended Practices for Safety and Health Programs to which the State of Pennsylvania's employers are bound.

2. Please ensure to retain ASME A17.3-2015 which is the latest edition that aligns with ASME A17.1-2016/CSA B44-16. When this is done it must be done in accordance with what is recommended and follow a process that brings its enforcement to bear on the jurisdiction but mitigates impact. Any argument to not accept this is derived from an individual that is not trained in safety processes. The jurisdiction should assemble its AHJ, specifically its Elevator Safety Board whom would act in accordance with Pennsylvania's Act 68 2018, Section 2214 to start the process including determining the date existing installations must conform to the requirements. It is recommended that a local committee, consisting of representatives of groups directly interested, augment the elevator safety board as needed in an ad hoc status to study the existing local conditions and to determine the length of time existing installations should be given between adoption of this Code and compliance with each provision. Representatives of the following groups should be considered for serving on such a committee: (a) building owners, (b) real estate management, companies, (c) architects and consulting engineers, (d) manufacturers of the equipment, (e) maintenance companies, (f)

insurance companies, (g) city and state enforcement officials, (h) elevator labor unions etc. populate additional persons as needed. Plan it, implement it in pieces, do not negate it to save money. Money won't be saved only safety will be negated.

Rationale: The hazards that exist on existing equipment are numerous enough to warrant utilizing a retroactive approach. Despite legacy equipment fairing better than newer equipment for reliability there is value in adopting through a process and ultimately enforcing ASME A17.3-2015. This increases safety to a community while lowering costs to a building owner.

3. Please take exception to adopting A17.7 ASME A17.7-2007/CSA B44.7-07 Performance-based safety code for elevators and escalators. This standard pre-existed in revisions and adoptions in many jurisdictions thus far but without clear understanding. The position of negating its inclusion moving forward, as with any change in a status quo should be guided with objective observation, measurement, assessment, planning and ultimately safety provisions to multiple sets of affected personnel. Observations of A17.7 show historically it being sold as an innovation to provide safety while keeping pace with technology. What has precipitated is the utilization of this standard to rubber stamp new technology with no practical application of safety to affected persons being considered, developed and enforced. This standard provides an incomplete listing of hazards/risks and no further guidance beyond that to practically apply safety measures and therefore is not equivalent to a prescriptive standard. Plans moving forward is to advocate for safety as we have always done. When A17.7 is brought to bear on any scenario we will vet it against fundamental safety processes we have come utilize to filter hazardous variables from our culture. As in the past it is expected that A17.7 although somewhat sound in principle will be shown to provide only monetary gains to employers at the expense of the safety of their employees and those who would ride our work. In one case history A17.7 ASME A17.7-2007/CSA B44.7-07 Performance-based safety code for elevators and escalators was used to bring conveyances on a large scale jobsite into the community, 45 unmitigated/uneliminated hazards were identified but never addressed, required certificates of conformance advertised as required publicly were spontaneously indicated to be invalid by the accredited elevator escalator certifying organization and ultimately it was reported that the A17.7 claimed safe conveyances were turned over allowing the public to use them somewhere between 9 days and 5 weeks before being certified after the fact.

Rationale: The A17.7 safety Standard does not establish equivalent safety requirements as compared to prescriptive standards.

4. Section 2.7 Machinery Spaces, Machine Rooms, Control Spaces, and Control Rooms **revise** as follows:
2.7.5.1 Working Areas in the Car or on the Car Top.

The requirements of 2.7.5.1.1 through 2.7.5.1.4 shall be complied with if ~~maintenance or inspections of~~ the elevator driving-machine brake, emergency brake, elevator motion controller, or motor controller are ~~located to be carried out from~~ inside the ~~car or from the car top~~ hoistway.

2.7.5.1.1 ~~If maintenance~~ During maintenance, repairs, replacements, tests or inspection of the elevator driving-machine brake, ~~or an~~ emergency brake, ~~or of~~ elevator motion controllers or motor controllers ~~from located~~ inside the hoistway from inside the car or from the car top ~~could result in unexpected vertical car movement~~, a means to prevent this unexpected vertical movement shall be provided.

Rationale: The hazard of unexpected movement of machinery in this scenario always exists for MRLs. Permissive and subjective language should be revised to mitigate/eliminate the potential for but not limited to OSHA Focus Four hazards of struck by, caught between, falls and electrocution due to unexpected vertical movement.

5. Section 1.3 Definitions, **add** the following definition:

Controller, AGP A device or group of devices that serves to control in a predetermined manner

the apparatus to which it is connected and wherein any portion of the AGP Controller is accessible or exposed to the general public at any time.

Rationale: To define equipment that may present hazards to untrained personnel (The Public).

6. Section 2.7 Machinery Spaces, Machine Rooms, Control Spaces, and Control Rooms, **revise** 2.7.6.3.2(e) as follows:

2.7.6.3.2 The motor controller shall be located in a machinery space, machine room, control space, or control room. A motor controller shall be permitted to be located outside the specified spaces, provided it is enclosed in a locked cabinet. The locked cabinet shall be

...

(e) labeled/marked “AGP” in accordance with the requirements of CSA B44.1/ASME A17.5 (see 2.26.4.2) and the requirements of this code.

Rationale: To ensure a motor controller in or exposed to a public area at any time that may present hazards to trained and untrained personnel is properly marked. This revision reinforces and is reinforced by the proposed definition of AGP Controller. Access and working space has to be provided and maintained about all electrical equipment to permit ready and safe operation and maintenance of such equipment. Additionally affected persons in a public area have to be protected.

7. Section 2.7 Machinery Spaces, Machine Rooms, Control Spaces, and Control Rooms, **revise** 2.7.6.3.2(f) as follows:

2.7.6.3.2 The motor controller shall be located in a machinery space, machine room, control space, or control room. A motor controller shall be permitted to be located outside the specified spaces, provided it is enclosed in a locked cabinet. The locked cabinet shall be

...

(f) provided with a sign in conformance with the requirements of ANSI Z535.2 or CAN/CSAZ321,

that shall be prominently posted:

(1) on the inside of the motor controller cabinet door

(2) indicating in letters not less than 25 mm (1 in.) high,

(3) “DOOR TO BE CLOSED & LOCKED WHEN ELEVATOR PERSONNEL ARE NOT PRESENT AT THIS CONTROLLER.”

(4) Procedures for maintenance, repairs, replacements, and tests performed by elevator personnel shall be provided (See 8.6.1.4.1)

Note: Equipment in an area accessible to the general public may present hazards addressed in additional codes and standards such as but not limited to the model building codes and OSHA regulations.

Rationale: To ensure applicable procedures related to a motor controller in or exposed to a public area at any time that may present hazards to trained and untrained personnel are provided. Access and working space has to be provided and maintained about all electrical equipment to permit ready and safe operation and maintenance of such equipment. Additionally affected persons in a public area have to be protected. In this area several standards have been found to be in conflict that may result in a reduction to life, limb and the welfare of affected persons. Contact me if this is in need of further explanation as a physical meeting is warranted to adequately address the quantity and quality of this sensitive area.

8. Section 2.7 Machinery Spaces, Machine Rooms, Control Spaces, and Control Rooms, **add** 2.7.6.3.2(g):

2.7.6.3.2 The motor controller shall be located in a machinery space, machine room, control space, or control room. A motor controller shall be permitted to be located outside the specified spaces, provided it is enclosed in a locked cabinet. The locked cabinet shall be

...

(g) Electrical clearance requirements shall comply with NFPA 70, NFPA 70E, 29 CFR 1926 or 29 CFR 1910, whichever is applicable (see Part 9). In the event two or more code requirement(s) conflict, the requirement(s) providing a higher degree of safety shall be used.

Rationale: To ensure a working space in proximity to a motor controller in or exposed to a public area at any time that may present hazards to trained and untrained personnel is provided. Access and working space has to be provided and maintained about all electrical equipment to permit ready and safe operation and maintenance of such equipment. Additionally affected persons in a public area have to be protected. In this area several standards have been found to be in conflict that may result in a reduction to life, limb and the welfare of affected persons. Contact me if this needs further explanation as a physical meeting is warranted to adequately address the quantity and quality of this sensitive area.

9. Part 9 Reference Codes, Standards, and Specifications, **add** the following:

<u>NFPA 70E-2018</u>	<u>Standard for Electrical Safety in the Workplace</u>	<u>NFPA</u>	<u>US</u>
<u>29 CFR 1910 (Latest Edition)</u>	<u>Safety and Health Regulations for General Industry</u>	<u>OSHA</u>	<u>US</u>
<u>29 CFR 1926 (Latest Edition)</u>	<u>Safety and Health Regulations for Construction</u>	<u>OSHA</u>	<u>US</u>

Rationale: The State of Pennsylvania, its jurisdictions and its contractors and separate jurisdictions operating within the state's boundaries are warranted, to comply with not only established codes and standards but, based on various factors to comply with one or all of the proposed referenced standards.

10. Section 2.12 Hoistway Door Locking Devices & Electric Contacts, & Hoistway Access Switches in requirement 2.12.7.2.1, **delete** the following:

2.12.7.2.1 The switch shall be installed a minimum of 1 200 mm (48 in.) & a maximum of 1 825 mm (72 in.) above the floor measured to the centerline of the switch, adjacent to or part of the hoistway entrance at the landing with which it is identified, & in one of the following locations:

(a) on the wall outside of the hoistway within 300mm (12 in.) of the entrance frame

(b) on the hoistway entrance frame or jamb

~~(c) on the sight guard~~

Rationale: As the distance between a human body and a hazard decreases the risk increases. This inverse relationship is a foundation of safety and is compounded by this requirement wherein the distance from a human body is to elevator equipment of substantive size and mass. There has been at least one accident in recent years resulting in an employee suffering a career ending injury related to this scenario created at least in part by engineering design.

11. Section 2.12 Hoistway Door Locking Devices & Electric Contacts, & Hoistway Access Switches in requirement, **delete** requirement 2.12.7.2.1:

~~2.12.7.2.2 Where the switch is located on the sight guard, the sight guard shall accommodate & support the load of the switch & its wiring.~~

Rationale: If the 2.12.7.2.1(c) requirement is deleted then this has no further meaning. In addition to the previous comment's rationale concerns of engineering an electrical component onto a hoistway door assembly that is for the most part electrically isolated may result in the assembly becoming energized posing a hazard to the riding public. This engineering design is in conflict with the afore mentioned comment on sound engineering in that it may increase the frequency of a worker operating in a location conducive to an OSHA Focus Four Hazard.

12. Section 8.7 Alterations delete the following:

~~8.7.2.14.5.2 Where conformance with 2.14.1.7 is not possible due to existing overhead conditions, a stowable design, e.g., foldable or collapsible, shall be permitted provided that~~

~~(a) when the railing is in the fully stowed position, the car shall be permitted to operate in any mode of operation except top-of-car inspection operation.~~

~~(b) when the railing is in the fully extended position, the car shall be permitted to operate only in top-of-car inspection operation in accordance with 2.26.1.4.2.~~

~~(c) when the railing is neither stowed nor in the fully extended position, the car shall not be permitted to operate.~~

~~(d) switches used to monitor the stowed position shall have contacts that are positively opened mechanically when the railing is moved from its stowed position.~~

~~(e) switches used to monitor the fully extended position shall have contacts that are positively opened mechanically when the railing is moved from its fully extended position.~~

~~(f) the occurrence of a single ground, or the failure of a contactor, a relay, or any single solid-state device, or a failure of a software system in the circuits incorporating these switches shall not permit operation other than as specified in 8.7.2.14.5.2(a), (b), or (e).~~

~~(g) means shall be provided to prevent upward movement of the car beyond the point required to maintain top-of-car clearances when the railing is not in the fully stowed position. Activation of the means shall not cause an average retardation exceeding 9.81 m/s² (32.2 ft/s²).~~

~~(h) when in the fully extended position, the railing shall meet the requirements of 2.10.2, and shall be designed to prevent accidental disengagement.~~

~~(i) the force required to extend or retract the railing shall not exceed 220 N (50 lbf).~~

Rationale: This requirement introduces a hazard by modifying an engineering control that may result in reduced vertical clearance that will result in an OSHA defined focus four fatality of struck by or caught between. Additionally it will result in an OSHA defined focus four fatality of a fall. An employer in The United States to include its territories would be legally in violation of imminent danger violations of 29 CFR 1910, Subpart D and I and 29 CFR 1926 Subpart M. In essence a building owner would have purchased an elevator no one could safely and legally access the car top of.

13. 6.1.6.3.6 Escalator Skirt Obstruction Device revise as follows

Means shall be provided to cause the electric power to be removed from the escalator driving-machine motor and brake if an object becomes caught between the step and the skirt as the step approaches the upper or lower combplate. The device shall be located at a point at which the step assumes a flat step position (see 6.1.3.6.5). The escalator shall stop before that object reaches the combplate with any load up to full brake rated load with escalator running [see 6.1.3.9.3(a)(2) and (b)(2)]. The device shall be of the manual reset type ~~or it shall be permitted to automatically reset not more than one time within 24 hr of operation and thereafter require a manual reset before the next restart. Interruption of power during operation should not cause the device to lose the status of the timer nor the count of events.~~

Rationale - Permitting an Escalator Skirt Obstruction Device to automatically reset one time within 24 hours of operation lowers the minimum safety standard. The ability for an electromechanical machine to effectively rule out a hazardous condition being present as opposed to elevator personnel ruling out the presence of a hazard has not been proven to ensure safety to the riding public.

14. 6.1.6.3.9 Step upthrust Device revise as follows

Means shall be provided in the passenger-carrying line of the track system to detect a step forced upward in the lower transition curve at or prior to the point of tangency of the horizontal and curved track. The means shall actuate when the riser end of the step is displaced upward more than 5 mm (0.20 in.) at the lower landing. Actuation of the means shall cause power to be removed from the driving-machine motor and brake. The escalator shall stop, before the detected step reaches the combplate with any load up to brake rated load with escalator running [see 6.1.3.9.3(a)(2) and (b)(2)]. The device shall be of the manual reset type ~~or it shall be permitted to automatically reset not more than one time within 24 hr of operation and thereafter require a manual reset before the next restart. Interruption of power during operation should not cause the device to lose the status of the timer nor the count of events.~~

Rationale - permitting a Step Upthrust Device to automatically reset one time within 24 hours of operation lowers the minimum safety standard. The ability for an electromechanical machine to effectively rule out a hazardous condition being present as opposed to elevator personnel ruling out the presence of a hazard has not been proven to ensure safety to the riding public.

15. 6.1.6.3.12 Handrail Entry Device revise as follows

A handrail entry device shall be provided at each newel. It shall be operative in the newels in which the handrail enters the balustrade. It shall cause the escalator to stop by removing power from the driving-machine motor and brake. It shall operate in either of two ways:

(a) if an object becomes caught between the handrail and the handrail guard (b) if an object approaches the area between the handrail and the handrail guard. For those units that rely on an opening of the balustrade to prevent entrapment, all handrail entry devices shall be operative whenever the handrails are operating. The device shall be of the manual reset type ~~or it shall be permitted to automatically reset not more than one time within 24 hr of operation and thereafter require a manual reset before the next restart. Interruption of power during operation should not cause the device to lose the status of the timer nor the count of events.~~

Rational - Permitting a Handrail Entry Device to automatically reset one time within 24 hour of operation lowers the minimum safety standard. The ability for an electromechanical machine to effectively rule out a hazardous condition being present as opposed to elevator personnel ruling out the presence of a hazard has not been proven to ensure safety to the riding public. Personnel ruling out the presence of a hazard has not been proven to ensure safety to the riding public.

16. 6.1.6.4 Handrail Speed Monitoring Device revise as follows

A handrail speed monitoring device shall be provided that will cause the activation of the alarm required by 6.1.6.3.1(b) without any intentional delay, whenever the speed of either handrail deviates from the step speed by 15% or more. The device shall also cause electric power to be

removed from the driving-machine motor and brake when the speed deviation of 15% or more is continuous within a 2 s to 6 s range. The device shall be of the manual reset type ~~or it shall be permitted to automatically reset not more than one time within 24 hr of operation and thereafter require a manual reset before the next restart. Interruption of power during operation should not cause the device to lose the status of the timer nor the count of events.~~

Rationale - Permitting a Handrail Speed Monitoring Device to automatically reset one time within 24 hour of operation lowers the minimum safety standard. The ability for an electromechanical machine to effectively rule out a hazardous condition being present as opposed to elevator personnel ruling out the presence of a hazard has not been proven to ensure safety to the riding public.

17. 6.2.6.3.10 Handrail Entry Device revise as follows

A handrail entry device shall be provided at each newel. It shall be operative in the newels in which the handrail enters the balustrade. It shall cause the moving walk to stop by removing power from the driving-machine motor and brake. It shall operate in either of two ways

- (a) if an object becomes caught between the handrail and the handrail guard
- (b) if an object approaches the area between the handrail and handrail guard for those units that rely on an opening of the balustrade to prevent entrapment, all handrail entry devices shall be operative whenever the handrails are operating. The device shall be of the manual reset type ~~or it shall be permitted to automatically reset not more than one time within 24 hr of operation and thereafter require a manual reset before the next restart. Interruption of power during operation should not cause the device to lose the status of the timer nor the count of events.~~

Rationale - Permitting a Handrail Entry Device to automatically reset one time within 24 hours of operation lowers the minimum safety standard. The ability for an electromechanical machine to effectively rule out a hazardous condition being present as opposed to elevator personnel ruling out the presence of a hazard has not been proven to ensure safety to the riding public.

18. 6.2.6.4 Handrail Speed Monitoring Device revise as follows

A Handrail Speed Monitoring Device shall be provided that will cause the activation of the alarm required by 6.2.6.3.1(b) without any intentional delay whenever the speed of either handrail deviates from the treadway speed by 15% or more. The device shall also cause electric power to be removed from the driving-machine motor and brake when the speed deviation of 15% or more is continuous within a 2 s to 6 s range. The device shall be of the manual reset type ~~or it shall be permitted to automatically reset not more than one time within 24 hr of operation and thereafter require a manual reset before the next restart. Interruption of power during operation should not cause the device to lose the status of the timer nor the count of events.~~

Rationale - permitting a Handrail Speed Monitoring Device to automatically reset one time within 24 hours of operation lowers the minimum safety standard. The ability for an electromechanical machine to effectively rule out a hazardous condition being present as opposed to elevator personnel ruling out the presence of a hazard has not been proven to ensure safety to the riding public.

19. 8.6.1.2.3 Add as this was never an ASME approved deletion

Where a defective part directly affecting the safety of the operation is identified, the equipment shall be taken out of service until the defective part has been adjusted, repaired, or replaced.

Rationale – This was omitted during ASME processes of developing standards. No code making body is above a mistake. Add this as there are hundreds of defective products that have been identified with little or no knowledge as to this fact.

20. 2.12.7.3.3(c) revise as follows

~~If the lowest landing is the normal means of access to the pit, the hoistway access switch shall enable the car to move in the up direction to a point between 2 130 mm (84 in.) and 2 450 mm (96 in.) from the floor level to the bottom of the platform guard, unless the travel of the car limits such movement.~~

The movement of the car initiated and maintained by the hoistway access switch at the lowest landing, if this landing is the normal means of access to the pit, shall be limited in the up direction to the point where the bottom of the platform guard is even with hoistway entrance header.

Rationale – The advent of new technology has made it difficult to impossible to control an elevator using a PM drive motor. A safety code should not negate safe language limiting car travel because the new technology has reduced effective control of the machinery.

21. 6.1.7.4.3 and 6.2.7.4.3 reference a standard that does not derive its language from safety, is not a safety standard and specifically does not address a safety circuit being affected by various devices transmitting wirelessly. Please assemble your AHJ to re-evaluate this referenced standard.

Rationale: As a member of an ISO committee I have been out voted and instructed that ISO standards are not safety standards, but rather marketing standards designed to increase business globally.

22. Please prohibit a hydraulic machine to be located in a hoistway/pit. Add the following.

3.24.5 Location of Tanks

Hydraulic machines being installed in the line of movement of an elevator car or wherein an affected person is required to work in the line of movement of an elevator car shall be prohibited.

Rationale: April of 2018 an affected person was killed by an engineered hazard which never was compliant with published standards. Due to this fatality increased local enforcement to prevent further fatalities is warranted.

23. I have provided a rough list you can use to evaluate the adoption of multiple standards thus empowering you, The AHJ to carefully and responsibly move forward as you wish. Please remember that jurisdictions such as California enforce an older edition of the applicable standards yet have a more advanced variance process allowing safe enforcement. Please consider stepping back and evaluating how you move forward with your adoption. If any support is desired, we are willing to assist as needed.

24. Please consider assembling your safety board or committee, and if that board or committee does not exist assemble an ad hoc board to, recognize, communicate and ultimately adopt codes and standards only after a comprehensive review of the language.

Rationale: In an attempt to assure the provision of professional services is enabling the most efficient and effective use of the state's public safety resources, allowing for the consolidation of such functions as communications, training, and operating procedures and to protect the lives and promote the safety of the citizens of this state. It is essential to the maintenance of a democratic society that language being proposed undergoes due diligence vetting its possible effect on the citizens of your communities. The changes in ASME A17.1/CSA B44 as each edition is published are radically different from any previous edition and you are embarking on a journey to adopt at least 1600 changes. You are not prepared to do this responsibly from my vantage point. There are people present in this room who claim complete and comprehensive knowledge of the safe adoption of this 2016 edition. I am a highly skilled elevator constructor in the areas of safety, standards, fundamental process development and would never make any claim to understand adopting a new standard without looking at each subsequent edition coming after that which I have accepted so as to safeguard those in my charge. I ask anyone hearing these words to ask themselves if they would stand before the men, women, children and all they are sworn to protect and promise they understand that which they are adopting.

25. Although not included in the handout provided, I am commenting to advocate for all provisions to provide enforcement in a private residence to be administered. See and hear the record produced by Judy Valencik to gather what I stated. Make this part of the minutes and record of comment to be acted upon.

26. Although not included in the handout provided, I am commenting to advocate for all provisions to provide enforcement in a Wind Turbine on Wind Turbine Tower Elevators to adopt ASME A17.8. See and hear the record produced by Judy Valencik to gather what I stated. Make this part of the minutes and record of comment to be acted upon.

27. Although not included in the handout provided, I am commenting and was later questioned by The Chair that I had heard both wonderful and some horrific statements made during the proceedings. See and hear the record produced by Judy Valencik to gather what I stated. Make this part of the minutes and record of comment to be acted upon. I will undoubtedly have additional questions and comments when and if I obtain a transcript of the proceedings.

R. Scott Hultstrom

IUEC Elevator Constructor

6919 South Valley Stream Drive, Tucson, Arizona 85757 USA