December 10, 2025

George Martinez, Chair
Community and Economic Development Committee
City Hall
632 W. 6th Avenue
Anchorage, AK 99501

RE: Anchorage 2024 Code Series, Code Change #22

Dear Mr. Martinez:

The National Elevator Industry, Inc. (NEII) is the leading trade association for companies that manufacture, install, and maintain elevators, escalators, moving walks, and other building transportation products. NEII members collectively represent more than 85 percent of the work hours in the building transportation industry. We appreciate the opportunity to express our concerns with the Anchorage 2024 Code Series, Code Change #22.

The Municipality of Anchorage (MOA) proposes to amend Section 2.7.6.2 of the 2019 edition of ASME A17.1/CSA B44, *Safety Code for Elevators and Escalators* (ASME A17.1-2019) published by the American Society of Mechanical Engineers (ASME). This proposal, Code Change #22, as currently drafted, will restrict where elevator controllers may be located. The proposal would preclude the installation of a popular code-compliant elevator configuration that has been safely used in Anchorage for decades.

Code Development: Industry Seeking to Provide Expertise

One of NEII's primary roles is to provide expertise and guidance on the development and application of elevator safety code through the association's Central Code Committee (CCC). The CCC is made up of engineers and code officers from NEII's member companies, who come together to build industry consensus views that can be shared directly with authorities to develop, maintain and apply codes and standards that pertain to building transportation equipment.

Unfortunately, NEII has struggled to participate in the MOA's development process for the 2024 Code Series. Upon learning of proposed Code Change #22 in May 2025, NEII contacted city staff in order to take part in stakeholder meetings ("Elevator Subcommittee"), but we were told that as an "outside organization" we could not attend.

The Elevator Subcommittee published the Code Change #22 proposal document (Attachment 1), which detailed a proposal to delete and revise Section 2.7.6.2, providing four reasons for the change. It was that document that NEII used to meet with its member companies and develop a consensus industry response, which NEII submitted to the Building Board in preparation for its

Nov. 6 public hearing. NEII's comments to the Building Board were forwarded to Anchorage Engineering Services Manager Daniel King, who provided a response to NEII's comments (Attachment 2). In King's response, he quoted a different version of proposed text for Code Change #22. NEII did not secure a copy of the amended text until after the Nov. 6 Building Board meeting.

Proposed Code Change #22 text as published by Elevator Subcommittee:

> *"Machinery spaces shall be permitted to be located inside or outside the hoistway. Control spaces shall be required to be located outside of the hoistway where all accessible portions of the controller required for maintenance, repair, testing and inspection are accessible without entry into the hoistway".*

Proposed Code Change #22 text as considered by the Building Board:

> *"Machinery spaces may be located inside or outside the hoistway. Control spaces are not permitted inside the hoistway unless it can be accessed without shutting down the car. Control spaces are only permitted inside the building."*

While the most recent version of text as detailed above is less restrictive, we maintain serious concerns related to the clarity of the current language. We are concerned that the new language proposed above could be confusing and result in conflicting interpretations.

For example, we understand from King's response (Attachment 2) that MOA's intention for Code Change #22 is to limit the potential hazards to elevator technicians by limiting the amount of time they are working inside the hoistway. That position aligns with recent staff comments made to NEII that suggest that the intention of Code Change #22 is to continue to allow a control space to be located within the hoistway so long as it is accessible only from outside the hoistway. The proposed text, however, includes a condition "without shutting down the car." NEII believes the above text, as currently proposed, could cause confusion and unintended consequences once adopted. If the intent is to ensure the control can be accessed for service from outside the car, the following change would be much clearer:

> *"Control spaces are not permitted inside the hoistway unless the controller can be accessed ~~without shutting down the car~~ for service from outside the hoistway."*

Another concern is the line that reads: "Control spaces are only permitted inside the building." Presumably the intention of this requirement is to keep the control space in an easily accessible and temperature-controlled environment, not exposed to the elements. However, for many traction elevators, machinery spaces and control spaces may be located within a roof-top machine room. Does such a room constitute being "inside the building"? The International Building code already requires the elevator equipment to be in a temperature-controlled room or space (3005.2), so there is really no need to add this requirement.

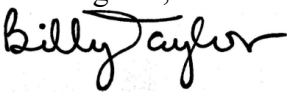
For these reasons, NEII and its member companies urge the Community and Economic Development Committee to remand proposed Code Change #22 to staff for further discussion with industry stakeholders.

It is worth noting that a similar proposal was considered in 2018 by the MOA Building Safety Elevator Inspector Program. At that time, a stakeholder meeting and associated site visit was arranged, which resulted in Acting Building Official Ross Noffsinger, and his staff, to conclude that there is no reason to preclude elevator controllers from being located inside the hoistway. In the intervening period, such units have been installed and maintained in a safe operating manner in Anchorage.

NEII staff and member companies are happy to participate in another such stakeholder meeting and site visit, where we can bring together technical experts from the elevator industry who can describe the operation of the equipment and address any concerns or questions as needed.

Please feel free to contact me at btaylor@neii.org if you have any questions or require additional information.

Best regards,



Billy Taylor
Director, Government Affairs

Attachment 1

Proposed Local Amendments to the 2024 Code Series

☐ Architectural ☐ Structural ☐ Mechanical/Fuel Gas ☐ Plumbing ☐ Residential ☐ Fire
☐ Administration x Elevator ☐ Electrical

Name: MOA Elevator Inspection Section	Subcommittee: Elevator
Affiliation: MOA	Applicable Code Section(s): A17.1-2019 Section 2.7.6.2 – Location of machinery spaces and control spaces
Address:4700 Elmore Rd., Anchorage, AK, 99519	
Phone(907)343-8301	Code Change No:#22

In the space below, indicate your comments, including supporting reasons. Proposed text revisions, if any, must be specific and indicated by lining through deleted material and underscoring material to be added. Additional pages, if necessary, may be plain bond.

USE SEPARATE SHEETS FOR SEPARATE TOPICS

Proposed Change:

Delete and revise Section 2.7.6.2 to read as follows:

2.7.6.2 Location of machinery spaces and control spaces: Machinery spaces shall be permitted to be located inside or outside the hoistway. Control spaces shall be required to be located outside of the hoistway where all accessible portions of the controller required for maintenance, repair, testing and inspection are accessible without entry into the hoistway.

Reason for Change:

The reasons for this change are as follows:

- To permit repair, maintenance, testing and inspection of the elevator controller without entry into the elevator hoistway to enhance safety for elevator personnel, as the hoistway is a restricted area that requires special knowledge and tools for entry and such unique access features can greatly increase the time in which emergency personnel can respond to an accident that involves repair, maintenance, testing or inspection of the elevator controller.
- With a designated control space(s) located outside of the hoistway, the elevator Maintenance Control program documents, repair documentation, test forms, Unique procedures, wiring diagrams and other miscellaneous MCP records and documentation will be accessible without the need to remove the elevator from service and enter the hazardous space of the hoistway simply to access and view documents required to be located onsite.
- With the unique design of elevator systems that have its controller located in the hoistway, there are limited options for the equipment owner with regards to modernizing their elevator control equipment when controller components have been deemed obsolete and are no longer supported by the manufacturer. When options regarding modernization of equipment are limited, the cost of such modernizations often increase exponentially and could delay the replacement of obsolete parts and therefore possibly compromise the safe operation of the elevator.
- As Article 620.5 in the NFPA-70 Electrical code does outline an exemption for Elevator controllers for Article 110.26(A) with regards to the requirement for a defined area with minimum depth, height and width for the required working space about electrical equipment, the requirement of Article 110.26 itself is not subject to this exemption and therefore the elevator motor-controller and such portion thereof that is accessible from inside the elevator hoistway is in fact required to have its working space and access to and egress from this working space provided and maintained to permit ready and safe access, operation and maintenance of the equipment. Because this working space is required to be provided and maintained and because it requires full bodily entry, this area meets the definition of a Control room and as such is subject to the same requirements of any other room within the building that contains electrical equipment and because the floor of this control room is the top of the elevator cab and it must first be moved into position in order to access the controller, the required working

space is not maintained (as defined as "To keep in an existing state: preserve or retain") and because it is not maintained, it has been determined to be non-compliant with the requirements of Article 110.26. When the top of the elevator serves as the area to access the motor-controller, the requirement of maintaining egress from this area is also required just as it would be for any other room within the building that contains electrical equipment and the International Fire Code requires such Egress doors to be of the side-hinged swinging door, pivoted door or balanced door types and the type of door configuration used on elevators is of the horizontal slide type and would not be compliant with this requirement and therefore it has been determined that the NEC required working space on the elevator car-top that serves as the Control room for the elevator controller does not have safe egress that is compliant with the requirements of the NEC, IBC and IFC

Committee Action:

AS (as submitted) _____ **AM (as amended)** _____ **D (defeated)** _____

Attachment 2

MUNICIPALITY OF ANCHORAGE

Development Services Department | Building Safety

Date: November 5, 2025

To: Building Board Members
ATTN: Chair Bryce Hamels

From: Daniel King
Engineering Services Manager
MOA Development Services Department

Re: Proposed Amendment to ASME A17.1-2019 Section 2.7.6.2

Mr. Hamels,

The Municipality of Anchorage (MOA) Development Services Department has had a chance to review the letter provided by Billy Taylor with the National Elevator Industry, inc. (NEII) and provides the following response to their comments on the use of Machine-Room-Less Elevators (MRL's) and our proposed amendment to ASME A17.1-2019 Section 2.7.6.2 Location of Machinery Spaces and Control Spaces:

~~*Machinery spaces and control spaces shall be permitted to be located inside or outside the hoistway.*~~

Machinery spaces may be located inside or outside the hoistway. Control spaces are not permitted inside the hoistway unless it can be accessed without shutting down the car. Control spaces are only permitted inside the building.

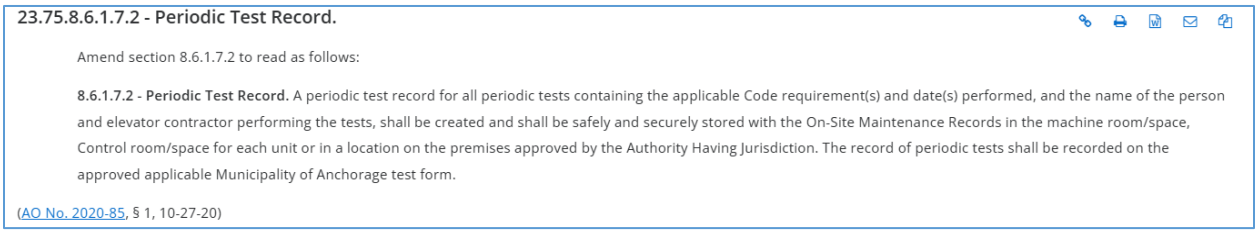
Reason 1 addressed concerns of safety for elevator personnel. NEII commented that the elevator personal are not at additional risk when an elevator utilizes an MRL.

MOA Response: When a machine room is utilized, approximately 30% of the elevator personnel's time is spent in the hoistway (on top of or underneath the car). When an MRL is utilized and the control space is within the hoistway, approximately 85% of their time will be spent inside the hoistway. This is a dangerous job which all workers should be trained for. Similarly, firefighters are trained to deal specifically with fire conditions, however we also have a fire code to limit the possibility of fires and limit the exposure personnel will have in these situations. The MOA recognizes the importance of training elevator professionals but also seeks to limit the risks they will be exposed to where possible.

Reason 2 addressed record keeping typically being kept within the control space. NEII commented that there is no requirement to do this.

MOA Response: MOA has historically had an amendment to store records in the control room or control space, due to a history of records being lost. There is a provision that allows other locations to be

requested, but elevator manufacturers have not utilized this because the best location for the records is with the elevator. Therefore, to review these records, elevator personnel would need access to the hoistway. See AMC 23.75.8.6.1.7.2.



23.75.8.6.1.7.2 - Periodic Test Record.

Amend section 8.6.1.7.2 to read as follows:

8.6.1.7.2 - Periodic Test Record. A periodic test record for all periodic tests containing the applicable Code requirement(s) and date(s) performed, and the name of the person and elevator contractor performing the tests, shall be created and shall be safely and securely stored with the On-Site Maintenance Records in the machine room/space, Control room/space for each unit or in a location on the premises approved by the Authority Having Jurisdiction. The record of periodic tests shall be recorded on the approved applicable Municipality of Anchorage test form.

(AO No. 2020-85, § 1, 10-27-20)

Reason 3 addressed modernization concerns where there could be limitations on replacing the panel inside the hoistway. NEII asserts that this is not limited within the hoistway, and this concern is speculative.

MOA Response: Agreed that there can be issues whether the control space is within the hoistway or not; however, alternative modernization options may not be able to be utilized in the existing control space panel dimensions. This could mean a thicker or larger panel would need to be installed. Thicker panels would lead to issues of clearance while larger panels would require cutting into a rated assembly, potentially needing additional trades to access the hoistway. Moving the control space outside the hoistway would allow larger panels to be installed and additional trades would not need to access the hoistway. In this way, the modernization effort can be cheaper and safer.

Reason 4 recognizes that NFPA 70 Article 110.26 requires open and clear access to electrical panels and equipment, where the control space in the hoistway is often impeded by the elevator doors. NEII asserts that this is not an argument used in other jurisdictions.

MOA Response: The elevator doors will often impede access to the control space when the door is in the open position. This requires that the doors be closed to access the panel. When NEII says this is not an argument in other jurisdictions, they ignore that the amendment to disallow a control space within the elevator hoistway has been adopted by New York City, Seattle, and California State. The language utilized by the MOA to propose this change is taken directly from the New York City local amendment. This has been determined by large jurisdictions throughout the United States as a dangerous condition. See attached amendment from New York City building code.

This amendment in no way disallows the use of MRL's but asks the industry to consider the safety of elevator personnel. From discussion with architects in Anchorage, this is not a request by designers to keep the control space in the elevator, but it is what is presented as the only alternative to requiring a machine room.

Please consider this letter and recommend this amendment for adoption.

Daniel King
Engineering Services Manager
Development Services Department

New York City – Machine & control space Requirements 7-2019

2.2.2.5 Elevators with sprinklers in the shaftway must be provided with a drain or sump pump.

2.2.4 Access to pits.

Delete and revise Section 2.2.4.1 to read as follows:

2.2.4.1 Access must be by means of the lowest hoistway door or by means of a separate pit access door, located at the level of the pit floor.

Add new Subsection (f) to Section 2.2.4.4 to read as follows:

(f) Pit doors must be labeled "DANGER: ELEVATOR PIT" with letters not less than 51 mm (2 in) high.

SECTION 2.7
MACHINERY SPACES, MACHINE ROOMS, CONTROL SPACES, AND CONTROL ROOMS

2.7.3 Access to machinery spaces, machine rooms, control spaces, and control rooms.

Add new Subsection (d) to Section 2.7.3.1.1 to read as follows:

(d) A control space and machinery space for elevators must only be located where working clearances required for the control space will not impede upon the path of travel in unrestricted areas. Where the elevator control space is located in a path of travel in an unrestricted area, a clear path of travel parallel to the control space must not be less than the required working clearance plus 1219 mm (48 in.) perpendicular to the control space. A permanent barricade needed to establish the working clearances for the control space must be accessible to elevator personnel from the control space. The barricade must be deployed whenever the doors to the control space are in the open position. See Figure Q-2.

Add new Subsection (d) to Section 2.7.3.4.1 to read as follows:

(d) Labeled "ELEVATOR EQUIPMENT" with letters not less than 51 mm (2 in.) high.

Delete and revise the first sentence of Section 2.7.3.4.2 to read as follows:

Access doors to machine rooms, control rooms and control spaces must be provided.

Add new Subsection (d) to Section 2.7.3.4.6 to read as follows:

(d) Labeled "DANGER: ELEVATOR HOISTWAY" with letters not less than 51 mm (2 in.) high and have an electrical safety switch that will remove power from the hoist machine and brake if the door is opened.

2.7.6 Location of machinery spaces, machine rooms, control spaces, control rooms, and equipment.

Delete and revise Section 2.7.6.2 to read as follows:

2.7.6.2 Location of machinery spaces and control spaces. Machinery spaces may be located inside or outside the hoistway. Control spaces are not permitted inside the hoistway. Control spaces are only permitted inside the building.

Delete and revise Section 2.7.6.3.4 to read as follows:

2.7.6.3.4 Where a governor is located inside the hoistway, means of access conforming to the requirements of Sections 2.7.3.3 and 2.7.3.4 for inspection and servicing the governor must be provided from outside the hoistway.

Add new sentence to the end of Section 2.7.6.4 to read as follows:

These means must be permanently installed.

Delete and revise Subsection (d) of Section 2.7.6.4.3 to read as follows:

(d) If the car is moved manually, the effort required to move the car in the direction of load imbalance must not exceed 400 N (90 lbf). If the means used is removable, it must be stored outside the hoistway and access to the means must be with a key that is Group 1 Security. It must be suitably marked to indicate the machine for which it is intended. It must also contain instructions on its use and be labeled "Machine Brake Release".

SECTION 2.8
EQUIPMENT IN HOISTWAYS, MACHINERY SPACES, MACHINE ROOMS, CONTROL SPACES, AND CONTROL ROOMS

2.8.3 Pipes, ducts, tanks, and sprinklers.

Delete and revise Section 2.8.3.3 to read as follows:

2.8.3.3 Sprinkler systems conforming to NFPA 13 must be permitted to be installed in the hoistway or machinery space, subject to Sections 2.8.3.3.1 through 2.8.3.3.4.

SECTION 2.11
PROTECTION OF HOISTWAY OPENINGS

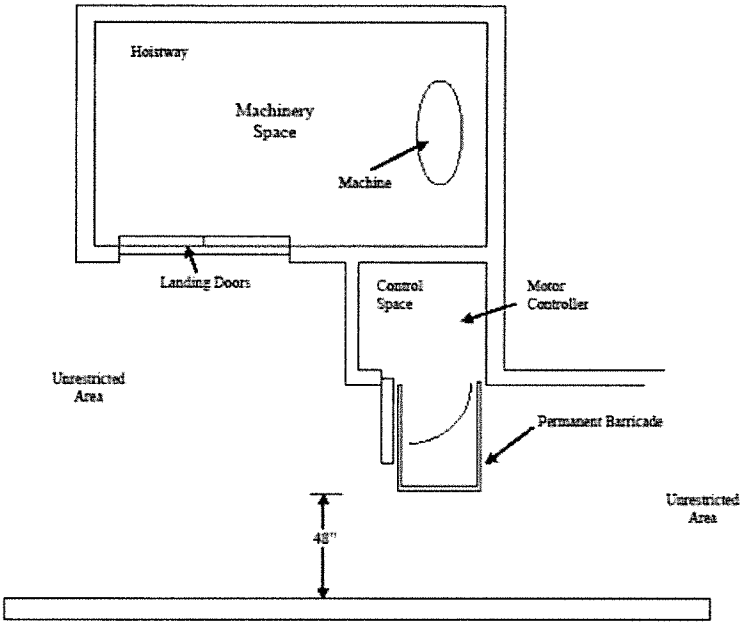
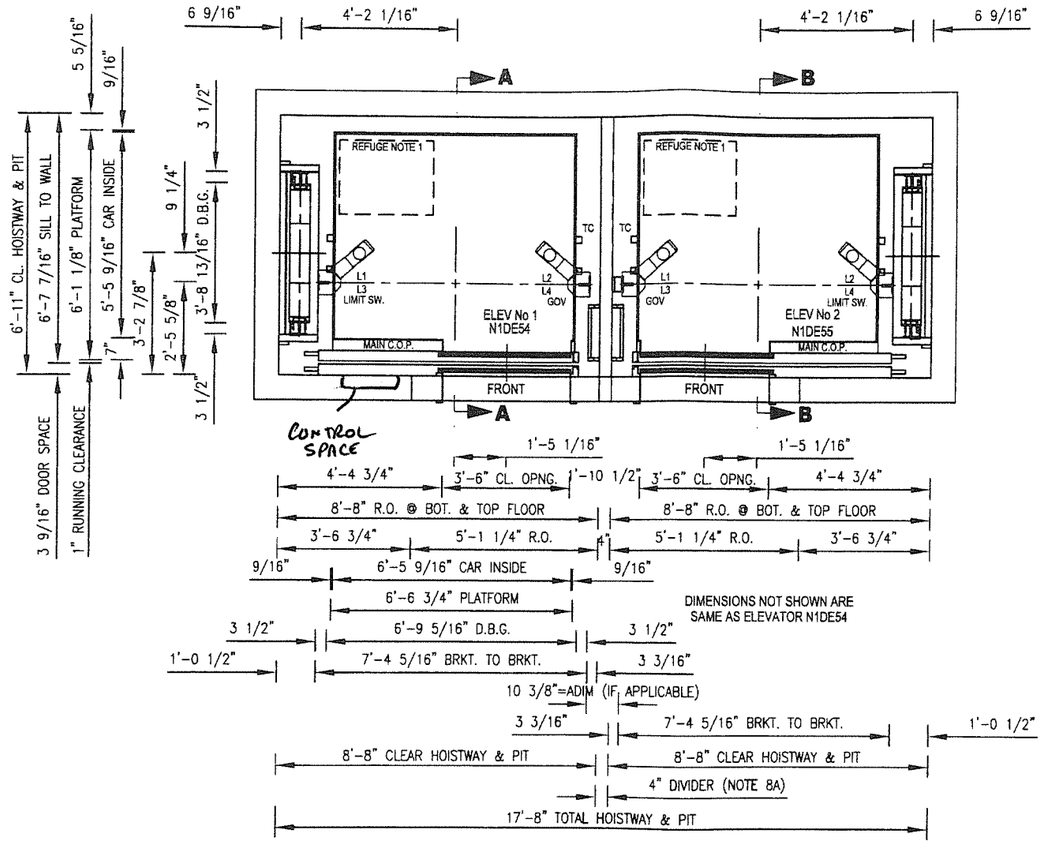

Hoistway
Machinery Space
Machine
Landing Doors
Control Space
Motor Controller
Unrestricted Area
Permanent Barricade
Unrestricted Area
43"

Figure Q-2



PLAN VIEW

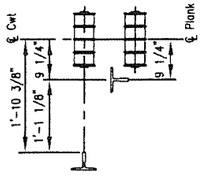
A17.1 2022 FIRE EQUIPMENT UPDATE
IN JURISDICTIONS ENFORCING A17.1-2022/B44:22 OR LATER EDITIONS OF THE ELEVATOR & ESCALATOR SAFETY CODE, HOISTWAY LIGHTING SHALL BE PROVIDED AND INSTALLED BY OTHERS IN LOCATIONS THAT DO NOT INTERFERE WITH ELEVATOR EQUIPMENT. COORDINATE LOCATIONS WITH YOUR LOCAL OTIS REPRESENTATIVE AND REFER TO THE WORK BY OTHERS DOCUMENTATION FOR ADDITIONAL REQUIREMENTS.

A17.1 2022 FIRE EQUIPMENT UPDATE
IN JURISDICTIONS ENFORCING A17.1-2022/B44:22 OR LATER EDITIONS OF THE ELEVATOR & ESCALATOR SAFETY CODE, AND WHERE EMERGENCY RESPONDER RADIO COMMUNICATION DEVICES (COAX CABLE AND ACCESS PANELS) ARE LOCATED IN THE HOISTWAY, THESE DEVICES SHALL BE INSTALLED IN A LOCATION THAT DOES NOT INTERFERE WITH ELEVATOR EQUIPMENT.

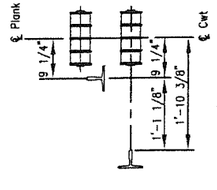
A17.1 2019 FIRE EQUIPMENT UPDATE
IN JURISDICTIONS ENFORCING A17.1-2019/B44:19 OR LATER EDITIONS OF THE ELEVATOR & ESCALATOR SAFETY CODE, AND WHERE FIRE ALARM INITIATING DEVICES ARE LOCATED IN THE HOISTWAY, PLEASE REFER TO THE PWBD INSTRUCTIONS FOR PANEL RATING AND LOCATION.

REFUGE NOTE 1
TYPICAL TOP OF CAR REFUGE SPACE 5.4 SQ. FT. WITH NO SIDE LESS THAN 2'-0" AND HEIGHT NO LESS THAN 3'-7".

NOTE 8A
A STEEL SEPARATOR BEAM TO BE PROVIDED (NOT BY OTIS) AT EACH FLOOR AND AT THE TOP OF THE HOISTWAY. DISTANCE BETWEEN SEPARATOR BEAMS NOT TO EXCEED THE MAXIMUM RAIL BRACKET SPACING SHOWN ON DRAWING.



BELTING DIAGRAM
CONTRACT No: N1DE54
ELEV No 1



BELTING DIAGRAM
CONTRACT No: N1DE55
ELEV No 2

FINAL LAYOUT

Gen3 Edge 3520

REVISIONS

TYPE MACH MODEL Gen3 Edge

CONTRACT NUMBER	PROJECT NUMBER	DUTY	SPEED	SERVICE TYPE
N1DE54	F7ND0830	3500#	200 F.P.M.	PASSENGER
N1DE55	F7ND0830	3500#	200 F.P.M.	PASSENGER

CONTRACT #	CONTROL SYSTEM TYPE	CONTROLLER PART NUMBER
N1DE54	GCS Traction	ABA21305DH
N1DE55	GCS Traction	ABA21305DH

OTIS

BUILDING: HOLIDAY INN EXPRESS
LOCATION: C ST AND INTERNATIONAL AP ROAD ANCHORAGE, ALASKA 99501
CONT. WITH: G2 CONSTRUCTION
OWNER: INTERCONTINENTAL HOTELS GROUP
ARCHT: MERRICK LENTZ ARCHITECT
DATED-PRELIM: FINAL: 4/12/2024
DRAFTER:ROD WILLIAMSON CHKD.BY:

NOTE - DO NOT SCALE THIS DRAWING

DWG. NO