



NATIONAL ELEVATOR INDUSTRY, INC.

SETTING STANDARDS IN MOTION

November 5, 2025

Mr. Bryce Hamels
Chair
Municipality of Anchorage
Building Board
4700 Elmore Road
Anchorage, AK 99519

RE: Anchorage 2024 Code Series, Code Change #22

Dear Mr. Hamels:

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 write to express strong opposition to the Anchorage 2024 Code Series, Code Change #22, which will prohibit the installation of a popular code-compliant elevator configuration that has been safely used in Anchorage for decades.

The Municipality of Anchorage 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, would restrict where elevator controllers may be located, and, in effect, would preclude an elevator configuration from including controllers located inside the elevator hoistway.

This change would prohibit the use of certain types of “Machine Room-Less” elevators, also known as MRLs. These MRL units have been included within the ASME A17.1 safety code for more than 20 years, and there are approximately one million MRL elevators installed around the world that are successfully repaired and maintained in a safe manner. In fact, prior to the inclusion of MRL requirements in the safety code, an extensive hazard analysis was conducted by committee members from ASME where all known hazards were addressed and mitigated. The ASME code community, which consists of over 300 technical experts, reviewed and approved the current requirements. The safety record over the past 20 years has proven that MRLs are safe and that additional restrictions on this equipment are unwarranted and unnecessary.

Reasons for Change: Industry’s Response

There are four reasons for the proposed code change provided within the Municipality of Anchorage Code Change #22 document, which NEII will address individually.

Reason 1: 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.

This reason suggests that the proposed code change is to allow for more work to take place outside of the elevator hoistway in an effort to enhance safety for elevator personnel. The reality is that elevator personnel are specifically trained to work in the hoistway, and there are a large number of tasks that already require work in the hoistway on all types of elevators – regardless of whether it's an MRL elevator or not. In fact, the additional components added to the hoistway for MRL equipment do not significantly add to the amount of time required to be in the hoistway. Therefore, the likelihood of needing emergency responders to enter the hoistway due to an incident is not greatly impacted either way. The components that need to be added into the hoistway for an MRL unit compared to traditional equipment typically are very low maintenance components that require minimal time in the hoistway. Further, when the controller is located inside the hoistway a means necessary for tests and the disconnecting means are required outside the hoistway.

Reason 2: 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.

There is no provision in the code that requires the MCP, on-site documentation, or maintenance records to be stored on the car top or inside the hoistway. They can be stored at the means necessary for test which is required to be outside the hoistway or in other locations in the building provided instructions are included to locate and view them at the means necessary for test; therefore, such documents can already be accessed without shutting down the elevator car and entering the hoistway. In many cases, the MCP and other documents can be accessed electronically, eliminating any concerns about entering the hoistway or shutting down an elevator to retrieve them.

Reason 3: 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.

The options for modernization are not restricted because equipment is located in the hoistway. This equipment can be and has been modernized by other companies. Future options and

capabilities for modernization are speculative. Moreover, there is no known or documented difficulty with modernization of equipment located in the hoistway. Obsolescence of control equipment is an issue for all types of equipment, not just MRLs.

Reason 4: 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

The required working space is provided and maintained for ready and safe access to the equipment. The car can be moved into position to access the controller and, when working on the motor controller, safety protocols require Lock-Out-Tag-Out (LOTO) of the controller which prevents the car from moving from that position. Please note that the interpretation provided in the rationale for this proposal, that the working space is not maintained, has not been raised anywhere else in the United States. When the car top is positioned for access to the motor controller, the working space on the car top provides “ready and safe” and secure working space for elevator personnel. The egress requirements in the IBC and IFC address the exits from the building. Mechanics work inside the hoistway on all types of elevators (not just MRLs) every day and access the hoistway via the hoistway doors in most cases. Whether the mechanic is working on a controller, a door operator, or some other component on the elevator, they must exit the hoistway before exiting the building.

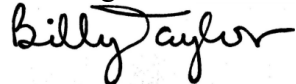
For these reasons, NEII and its member companies strongly oppose Code Change #22 and request that members of the Building Board deny the proposal as submitted.

It is worth noting that a similar proposal was considered in 2018 by the Municipality of Anchorage Building Safety Elevator Inspector Program. At that time, a stakeholder meeting and associated site visit was arranged, which resulted in staff concluding that there is no reason to preclude elevator controllers from being located inside the hoistway. In the intervening period, MRLs have been installed and maintained in a safe operating manner in Anchorage. NEII is unaware of any incident or data that suggests a need for the proposed modification of the model code.

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,

A handwritten signature in black ink that reads "Billy Taylor". The signature is written in a cursive, flowing style.

Billy Taylor
Director, Government Affairs