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.

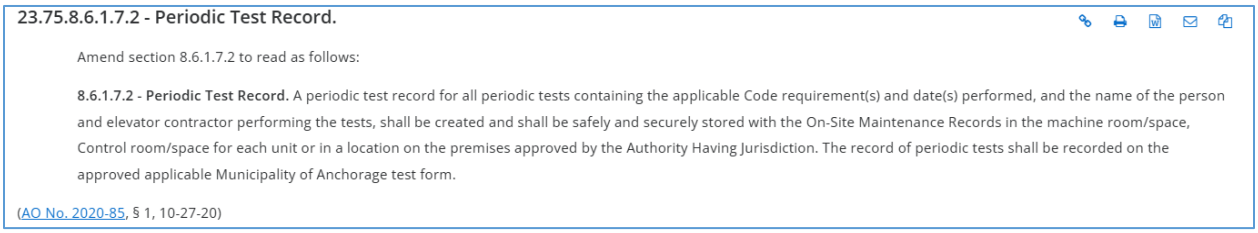
Reason 1 addressed concerns of safety for elevator personnel. NEII commented that the elevator personal are not at additional risk when an elevator utilizes an MRL.

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

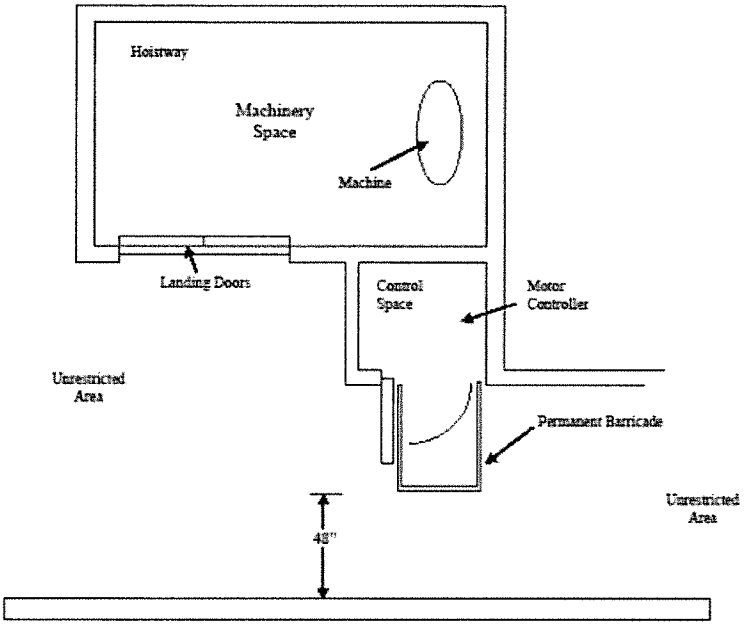
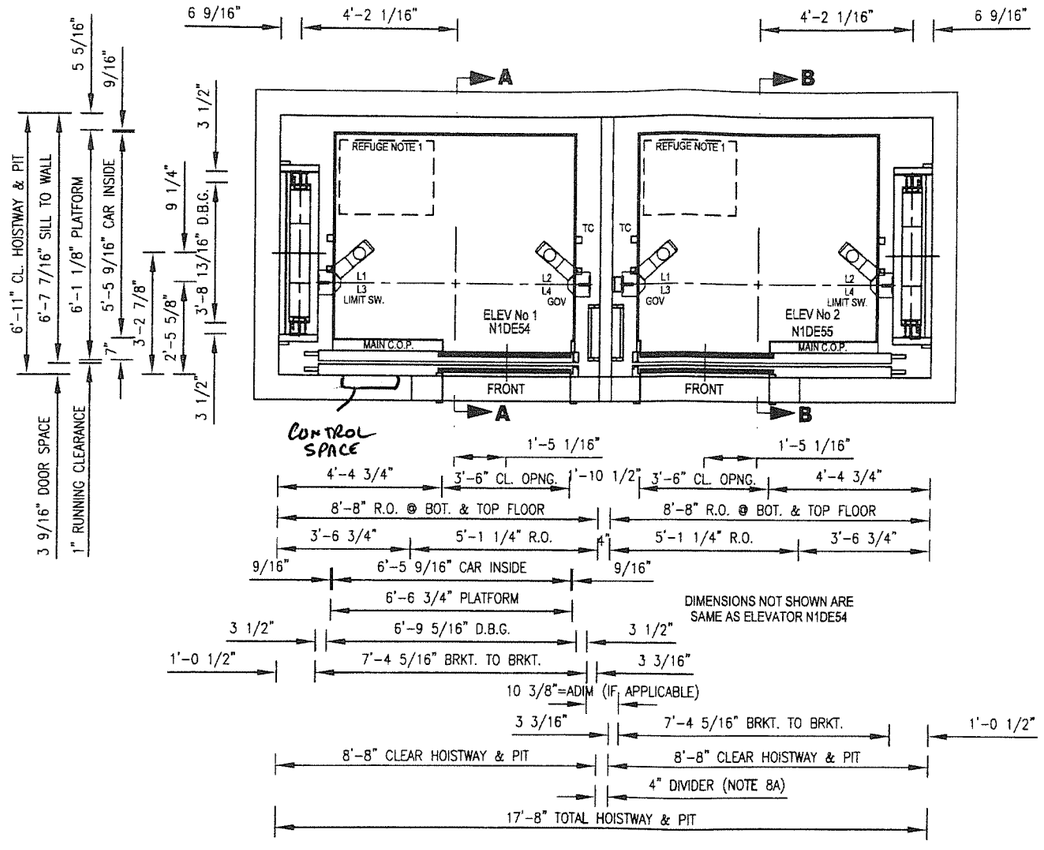
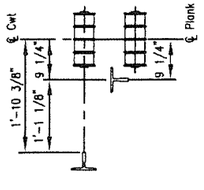

Hoistway
Machinery Space
Machine
Landing Doors
Control Space
Motor Controller
Unrestricted Area
Permanent Barricade
Unrestricted Area
43"

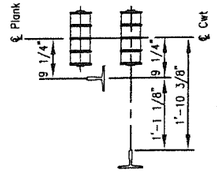
Figure Q-2



PLAN VIEW



BELTING DIAGRAM
CONTRACT No: N1DE54
ELEV No 1



BELTING DIAGRAM
CONTRACT No: N1DE55
ELEV No 2

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 PWBO 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.

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. N1DE54 PL