NATIONAL ELEVATOR INDUSTRY, INC.
SETTING STANDARDS IN MOTION

April 16, 2021

State of Hawaii
Department of Accounting and General Services
State Building Code Council
Attn: Howard Wiig, State Building Code Council Chair
1151 Punchbowl Street
Kalanimoku Building
Honolulu, Hawaii 96813

Re: Adoption of the 2018 International Building Code

Dear Chairperson Howard Wiig:

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 over eighty-five percent of the work hours in the building transportation industry. We write to highlight a potential conflict between the International Building Code (IBC) and elevator code with regards to emergency communication.

NEII is a strong proponent of coordination between the various codes during the adoption process. Coordination between the building codes and elevator codes is important to prevent a conflict that was created by a provision added in the 2018 IBC. Specifically, 2018 IBC Requirement 3001.2 mandates an emergency communication system for the deaf, hard of hearing, and speech impaired. NEII supports the intent of this code change, but the actual code language in the 2018 IBC is vague, difficult to enforce, and conflicts with the technical requirements for emergency communication in earlier editions of ASME A17.1/CSA B44 Safety Code for Elevators and Escalators (A17.1), Requirement 2.27.1. Because the provisions in the 2018 IBC include neither technical criteria nor a reference to another standard containing such criteria, the result will be a wide variety of communication systems resulting in inefficient service to the people who need to use these systems.

NEII members worked very closely with the American Society of Mechanical Engineers (ASME) Emergency Operations Committee to develop technical requirements for a communication system that would meet the intent of the 2018 IBC code change. The requirements in A17.1-2019/B44-19 were developed for consistency with the minimum requirements identified in the Americans with Disabilities Act Title III, ensuring effective communication with the deaf, hard of hearing and speech impaired. This criterion has been published in the 2019 edition of A17.1 Requirement 2.27.1 and provides clear guidance to manufacturers and code authorities to ensure new systems meet the needs of deaf, hard of hearing, and speech impaired users. The conflict exists when the building code is based on the 2018 IBC in conjunction with the 2016 or earlier editions of A17.1. Elevator inspectors will inspect the elevator communication system based on the requirements in A17.1. When conducting periodic inspections and tests, inspectors will look to the elevator code in effect when the elevator was installed or modernized and not to the building code in effect at that time.

To eliminate this conflict, NEII encourages the Hawaii State Building Code Council consider the following code language to replace 2018 IBC Requirement 3001.2 when adopting the 2018 IBC:

> **3001.2 Emergency elevator communication systems.** The elevator emergency communication system shall
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> 1. be installed in accordance with the provisions of ASME A17.1/CSA B44 and NFPA 72,
> 2. be available twenty-four hours a day, seven days a week, as a live interactive system.

2018 IBC Section 3001 defines the scope and reference standards for elevator emergency communication design requirements. This recommendation amending Requirement 3001.2 would retain the base requirement for the system in the 2018 IBC but would also reference the technical requirements included in the A17.1/B44 model elevator code. The recommendation requires the system to comply with A17.1; thereby, providing direct reference to technical requirements and allowing the building code to align with the edition of A17.1 adopted in the jurisdiction because the year is not included. This would allow the A17.1-2019 changes to incorporated once a jurisdiction adopts that edition of the code. This also eliminates any confusion that might result when inspecting elevators installed to an earlier edition of A17.1 because the communication system would match the edition of the elevator code.

If Hawaii adopts the 2018 IBC and changes are not made to Requirement 3001.2, there is an IBC process to address this conflict. For this scenario, NEII recommends that the Hawaii State Building Code Council publish a guideline. 2018 IBC Section 104.1, along with Sections 104.10 and 104.11, allow for modifications or alternatives on a case-by-case basis. These rules could be applied to this situation to eliminate the conflict. NEII recommends that the guideline informs elevator manufacturers, installers, and building owners that the A17.1-2019 requirements will be enforced.

NEII is committed to the safety of the public and elevator personnel. We stand ready to support the state of Hawaii in the process of reviewing the building code and assisting in the adoption process. NEII and representatives from its member companies are available to meet with you and other key stakeholders to assist in the review and update of the elevator codes and facilitate your efforts to update the portions of the building code related to elevators. We support updating the state building codes but feel it is vital to amend the requirements for the communication system to ensure it serves those who need it most. We look forward to hearing from you as to how we can assist you in this effort. Please do not hesitate to contact NEII's Director of Government Affairs, Priscilla Magee at (812)664-79081 or via e-mail at pmagee@neii.org if you have any questions or need additional information. Thank you for your time and attention to this important industry issue.

Sincerely,

Priscilla Magee,
Director of Government Affairs

CC: Dennis Mendoza