

America's leader in home elevators.

August 30, 2016

The Department of Public Safety Attention Stephen Carley

RE: Public Hearing: 524 CMR - August 22, 2016

Dear Board of Elevator Regulations,

We would like to take this opportunity to submit our comments regarding the amendments of the 524 CMR 1 through 38, Board of Elevator Regulations and the proposed changes to ASME A17.1-2013.

With the elevator industry realizing the need to identify and certify new technology products on the market, any version of the ASME A17.1 code from 2007 onward, references that compliance with the ASME 17.1 code can be achieved by conformance with the requirements in ASME A17.7. Omitting the A17.7 section from the code defeats the purpose of doing so. Massachusetts is the hub of technology and science and leaving out the A17.7 section from the elevator code hinders what our commonwealth represents.

As a home elevator company, we see the need for more safe, viable and innovative home elevator products to help keep our aging population in their homes and achieving compliance with the ASME 17.1 code by conformance with the requirements in ASME A17.7 should be left in the code.

Best Regards,

Terry Steen
V.P. of Sales