



# NEII

NATIONAL ELEVATOR INDUSTRY, INC.

SETTING STANDARDS IN MOTION

May 5, 2023

Construction Industries Commission  
Construction Industries Division – Regulation and Licensing Department  
5500 San Antonio Drive NE  
Albuquerque, NM 87109

RE: NEII Comments on the New Mexico Building Code Update

Dear Members of the Commission:

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 approximately eighty-five percent of the work hours in the building transportation industry. As such, we welcome the opportunity to comment on New Mexico's proposed adoption of the 2021 International Building Code (IBC).

NEII is a strong proponent for the adoption of the latest edition of the model building codes and elevator codes without deviation. As with all versions of codes developed by the American Society of Mechanical Engineers (ASME), ASME A17.1/CSA B44:19 *Safety Codes for Elevators and Escalators* (A17.1) ensures a uniform and high level of safety throughout New Mexico. A17.1 represents the optimum in safety, as it is developed and refined by hundreds of skilled experts representing all aspects of the elevator industry. Expertise is drawn from enforcing authorities, mechanical and electrical engineering and design experts, inspectors, consultants, labor authorities, building and facility owners, and installation and maintenance specialists. This state-of-the-art code is updated every three years and is used by all jurisdictions throughout the United States and Canada as a basis for elevator code.

NEII is also a proponent of coordination between codes during the adoption process. Coordination between the building and elevator codes is essential to prevent a conflict that was created by a provision added in the 2018 IBC and which remains in the 2021 edition. This provision, 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 code language in the IBC does not provide detailed technical requirements to ensure consistent enforcement. To ensure the emergency communication system meets the needs of people of all abilities, NEII strongly recommends IBC Requirement 3001.2 be replaced with the following language that has been approved for inclusion in the 2024 IBC:

**3001.2 Elevator emergency communication systems. An elevator emergency two-way communication system shall be provided that includes both visual and audible communication modes complying with the requirements in ASME A17.1/CSA B44. The system shall provide a means to enable authorized personnel to verify:**

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1. [the presence of someone in the car,](#)
2. [that the person\(s\) is trapped,](#)

[Once entrapment is verified, the system shall enable authorized personnel to:](#)

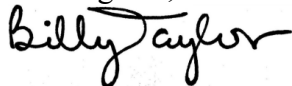
1. [Determine if assistance is needed,](#)
2. [Communicate that help is on the way,](#)
3. [Communicate when help arrives on site.](#)

This proposed revision to the 2021 IBC retains the base requirement for the system while referencing the technical requirements in A17.1. This modification will not increase or decrease the cost of construction because IBC Section 3001.1 also requires the system to comply with the requirements identified in A17.1 generally. This revision to the IBC language, along with adoption of the 2019 edition of A17.1 Requirement 2.27.1, eliminates this conflict.

NEII members worked 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 IBC code change. These technical requirements have been included in the 2019 edition of A17.1 (Requirement 2.27.1). Requirement 2.27.1 ensures the communication system improves entrapment assessment by authorized personnel and conveys additional information to entrapped passengers who are deaf, hard of hearing, or speech impaired. These improvements will help reduce errors, as an entrapment is identified on the first activation of the phone button, independent of the passenger's ability to communicate. This requirement meets the intent of the IBC code change, complies with the guidelines identified in Title III of the Americans with Disabilities Act, and provides clear guidance to manufacturers and code authorities to ensure new systems meet the needs of all users. NEII strongly encourages New Mexico to adopt the 2021 IBC along with the 2019 edition of ASME A17.1/CSA B44 or make the recommended modification to the 2021 IBC to eliminate any conflicts and to provide clear guidance for the design of the elevator emergency communication system.

NEII is committed to the safety of the public and elevator personnel. We stand ready to support the Construction Industries Commission and look forward to hearing from you as to how we can support the Department in this review process. Please contact me at 213-479-5738 or via e-mail at [btaylor@neii.org](mailto:btaylor@neii.org) if you have any questions or need additional information. Thank you for your time and attention to this important industry issue.

Best regards,



Billy Taylor

Director, Government Affairs