

## Maintenance Control Program Expectations

Dear Elevator Company:

The deadline for all conveyances specifically addressed in the A17.1 code to have a code-compliant maintenance control program (MCP) is rapidly approaching.

As of July 1, 2013, any elevator company specifically supplying maintenance for conveyances outlined in the A17.1 code which does not have a code-compliant MCP will have their license placed in probationary status and ultimately suspended for continued non-compliance of RCW 70.87.125. Suspension may be delayed if we have knowledge that you are currently working toward submitting your code-compliant MCP to the department for review and that you have submitted a letter to the department indicating the date your company will have a code compliant MCP available for customers. This letter must be signed by a corporate officer of the company.

If you don't have an MCP by July 1<sup>st</sup>, you must do the following:

- Demonstrate to the Chief Elevator Inspector or the Technical Specialist that you are actively and correctly pursuing completion of a code compliant MCP by emailing samples of the records and procedures so that they can evaluate and provide assistance for a successful outcome.
- Submit a letter to the department signed by a corporate officer indicating the date you will have a MCP ready for distribution. Please be aware that your company will be in probationary status with its Elevator Contractor's License. While in probationary status the department will not issue any permits for new or major alterations to your company.
  - Major alterations are defined as work being performed on controllers, machines, cabs, fixtures, or many other long term projects.
  - Minor alterations are defined as work performed caused by shutdowns, repairs and code deficiencies.
- If the department does not receive a corporate letter as described above or if the department receives a letter and the written commitment is not fulfilled, the department will cancel any existing new and alteration installation permits.
- The Assistant Director for Field Services & Public Safety, José Rodriguez, will, in coordination with the Chief Elevator Inspector, make a determination on a case-by-case basis to allow your company to maintain their license within a probationary status.
- If non-compliance with the MCP requirement continues, the department will suspend or revoke the elevator contractor's license.

This process will help ensure that the industry can provide a code compliant MCP for their customers.

If we do not receive indication that you have a code compliant MCP or that you are working towards completion of a code compliant MCP, your Elevator Contractor license will be suspended on October 1, 2013.

We recognize that the MCP requirement as described in ASME A17.1 requires a significant amount of work on the part of elevator companies. In February 2011, the Elevator program began working with the industry to raise awareness of the requirement and to provide consultative support in helping companies develop code compliant MCPs. The program has been communicating with the industry through our Listserv to the elevator companies' primary contacts and the Elevator Safety Advisory Committee. In July 2012, the program began enforcing the MCP requirement on existing installations. When an inspector performed an annual inspection on a conveyance covered by ASME A17.1 and did not find an MCP, the inspector would write a correction.

The Elevator program announced to the industry that the MCP requirement for new installations would be enforced starting in 2013. The program has offered to provide consultative reviews of MCPs and in November 2012, the program held a workshop open to the industry to meet and discuss the MCP requirement. Very few of the approximately 40 companies who do work on conveyances that fall under this requirement have chosen to work with the program to date.

To date, few maintenance service providers have produced a code compliant MCP. You are in receipt of this letter because we do not have documented proof that your MCP complies with ASME A17.1 section 8.6. If you believe you have a code compliant MCP you should contact the department immediately. If you need assistance in clarifying the items you need to include in your MCP, contact me immediately.

Thank you for your prompt attention to this matter. Please contact me if you have any questions.

Sincerely,

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

Jack Day  
Chief Elevator Inspector  
State of Washington