

CONCISE EXPLANATORY STATEMENT

Chapter 296-96 WAC Safety Regulations and Fees for all Elevators, Dumbwaiters, Escalators, and other Conveyances – Licensing

Public Hearing/s: July 10-13, 2018

Adoption: August 31, 2018

Effective: October 1, 2018

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I. Purpose of Rulemaking

This purpose of this rulemaking is to adopt changes to the elevator licensing rules in Chapter 296-96 WAC Safety Regulations and Fees for All Elevators, Dumbwaiters, Escalators and Other Conveyances. The program performed a formal review of the licensing rules to ensure the rules are consistent with industry practices, to update and clarify the rules, and to make housekeeping changes.

A. Background

On May 30, 2017, the department filed an emergency rule (WSR 17-12-022) and CR 101 Preproposal Statement of Inquiry (WSR 17-12-023) creating a temporary limited Category 03 license specific to work performed on hand-powered manlifts in grain terminals. The purpose of the emergency rule was to address the shortage of licensed mechanics in the grain industry for the upcoming harvest season.

On September 27, 2017, a second emergency rule (WSR 17-20-028) was filed to consider permanent rulemaking related to temporary limited Category 03 licenses for hand-powered manlifts in grain terminals.

Under the emergency rule (WSR 17-12-022 and WSR 17-20-028), elevator personnel that had not completed all of the education and training requirements for a full category (03) license, and were not yet eligible for a temporary category (09) license, were- eligible for the temporary limited category (03) license if they could demonstrate 50% completion of the education and training requirements towards a full category (03) license. Individuals had to be employed and certified as competent by a licensed elevator contractor, and actively pursuing education and training to achieve the full category (03) elevator mechanic license. The temporary limited category (03) license was valid for 30 days. The license could be issued six times and renewed consecutively for a six-month period. To obtain the temporary limited category (03) license, an elevator contractor had to demonstrate there was a backlog or need in the following areas: maintenance, repairs, installation or testing of conveyances. If the department determined the need to be warranted, the license would be issued.

During the department's formal review of the elevator licensing rules for category (03), the rules for other licensing categories and policies were also reviewed. As part of that review, the department asked for and received stakeholder input about which rules required changes. After review, the department decided to make changes to some licensing rules, but not to adopt permanent rules for temporary licenses for grain industry Category 03 elevator mechanics as the

emergency rules were sufficient to address the immediate concerns and it was determined that permanent changes are not needed at this time.

B. Summary of the rulemaking activities

The Elevator Program's rule development process includes an opportunity for public proposals, review, negotiation, and recommendations of all proposals by a Technical Advisory Committee (TAC), Elevator Safety Advisory Committee (ESAC) and the public hearing process.

On May 30, 2017, the department filed an emergency rule (WSR 17-12-022) and CR 101 Preproposal Statement of Inquiry (WSR 17-12-023).

On July 10, 2017, the department held a stakeholder meeting for building owners and property managers. This meeting gave owners the opportunity to ask questions about the rules, discuss upcoming changes, and share concerns.

On July 18, 2017, the department also filed a CR-101 Preproposal Statement of Inquiry (WSR 17-15-093) to update the elevator rules related to code requirements. This rule development process was done simultaneous to this rulemaking and used the same process.

L&I appointed a TAC consisting of 23 representatives from across the industry to review the proposals and to make recommendations for action following its review. The purpose of the TAC is to evaluate rule proposals focusing on life/safety, state policies, maintaining a fair competitive environment, and correcting errors and omissions. Candidates for appointment to the TAC submitted 44 applications to the department from August 1-August 25, 2017. The department selected 23 applicants.

Appointed TAC members were:

- 2 Elevator Advisory Committee Members (Non-Voting)
- 1 Fire Marshall
- 1 Elevator Labor Representative
- 1 Grain Industry Representative
- 2 L&I Inspectors (1 Supervisor and 1 Inspector)
- 1 ASME Code Panel Member

- 1 Engineer
- 1 Testing Laboratory
- 1 General Public Member
- 3 Elevator Mechanics
- 3 City Regulators (1 Supervisor and 2 Inspectors)
- 3 Elevator Contractors
- 3 Building Owners

On August 2, 2017, the department held a stakeholder meeting for elevator contractors and service companies. The 2016 Code Adoption and rule review were topics of discussion.

On August 22 & 23, 2017, the department held a two-day open stakeholder meeting to review the department's proposals and purpose for the rule changes. This meeting provided stakeholders an opportunity to ask questions pertaining to the department's rule proposals.

On August 24, 2017, the department held a stakeholder meeting for elevator mechanics/labor. The 2016 code adoption and rule review, examination and inspection responsibilities, education and licensing requirements, and participation in the TAC were topics for discussion.

The Department accepted rule proposals from stakeholders between September 1-October 5, 2017, and November 9-December 10, 2017. Stakeholders submitted 17 proposals to the department.

On September 27, 2017, a second emergency rule (WSR 17-20-028) was filed while the permanent rulemaking process continued.

On October 24, 2017, the department held a second stakeholder meeting for building owners. An update on proposals for code adoption and rules was a topic of discussion.

On December 28, 2017, the TAC met and voted whether proposals should be adopted as rules. The TAC also reviewed and voted on proposals from the department.

On February 12, 2018, the department held a second stakeholder meeting for elevator companies and contractors. The department discussed the study results, which included code adoption and grain industry.

On February 20, 2018, the ESAC reviewed and made recommendations to the department about the rule proposals. The purpose of the ESAC is to advise the department on the adoption of rules that apply to conveyances; methods of enforcing and administering the program statutes; and matters of concern to the conveyance industry and to the individual installers, owners, and users of conveyances.

The ESAC consists of 7 industry representatives:

- Licensed Elevator Contractors
- Owner-Employed Mechanics Exempt from Licensing
- Registered General Contractors
- State Government, Secretary
- Building Owners & Managers
- Ad Hoc Member
- Registered Architects or Professional Engineer
- Elevator Mechanics Licensed to Perform All Types of Conveyance Work

On April 9, 2018, the department held a second stakeholder meeting for elevator mechanics and labor. The 2016 code adoption, rule review examination and inspection responsibilities, participation in the TAC, and education and licensing requirements were topics of discussion.

On June 5, 2018, the department filed a CR-102 (WSR 18-12-102), and sought public comment on the proposed rules. Public hearings were held from July 10-13, 2018, at various locations throughout the state.

On June 26 & 27, 2018, the department held a two-day meeting to review the proposed rules and ASME A17.3 – 2015 requirements for existing equipment.

II. Changes to the Rules

There are no differences between the proposed rules and adopted rules.

III. Comments on proposed rule

The purpose of this section is to respond to the oral and written comments received through the public comment period and at the public hearing.

A. Comment Period

The public comment period for this rulemaking began June 20, 2018, and ended July 13, 2018. 12 persons attended the public hearings and 5 provided testimony. The department received 3 written comments during the public comment period.

B. Public Hearing/s

Public Hearing(s)		Number of persons that attended	Number of persons that provided testimony
Date: July 10, 2018 Time: 9:00 a.m. Location: L&I Tukwila Office 12806 Gateway Dr. S Tukwila, Washington 98168		4	1
Date: July 11, 2018 Time: 9:00 a.m. Location: Red Lion River Inn Hotel 700 N Division St. Spokane, WA 99202		4	1
Date: July 12, 2018 Time: 9:00 a.m.		0	0

Location:	Red Lion Hotel Yakima Center 607 E Yakima Ave. Yakima, WA 98901		
Date:	July 13, 2018	4	3
Time:	9:00 a.m.		
Location:	Towne Place Suites Marriott 17717 SE Mill Plain Blvd Vancouver, Washington 98683		

C. Summary of Comments Received and Department Response

Below is a summary of the comments the department received and the department's response. Since the code adoption rulemaking was done simultaneously to this rule, some stakeholders submitted comments on both rules. The department added comments relevant to the code adoption rulemaking to the Concise Explanatory Statement for that rule and will send all stakeholders who commented a copy of both Concise Explanatory Statements.

General Comments	Department Response
<p>Comment #1: The National Elevator Industry Inc. (NEII) appreciates the opportunity to provide comments regarding the proposed revisions to the Washington Administrative Code (WAC) 296-96 for licensing.</p> <p>Safety is a top priority for NEII and its member companies. We actively support the licensing of workers involved in building transportation industry because a skilled workforce helps improve safety for the riding public and industry personnel. Elevators, escalators and other conveyance equipment is very complex and technical, and the applicable building codes are continually being revised. It is critical that</p>	<p>Response #1: The department appreciates NEII's participation in the Elevator program's rulemaking process and on the Technical Advisory Committee (TAC). Your suggested rule change regarding the helper/apprentice ratio is substantially different from the rule proposed in the published notice of proposed rule adoption and will require a new rule-making procedure to adopt. While the rule language in this section is new, it incorporates the requirements under the existing rule definition for "General direction - Installation and alteration work" WAC 296-96-00700. This change was not reviewed or considered by the members of the Technical Advisory Committee.</p> <p>While this change may be in the Collective Bargaining Agreement, there are other employers and mechanics not subject to the Collective Bargaining Agreement</p>

only those individuals with the adequate training and education be licensed as elevator mechanics.

NEII supports the proposal to update the WAC licensing requirements in general; however, we have concerns with one of the proposed requirements. Specifically, the proposed change to 296-96-00902(4)9b) does not align with the Collective Bargaining Agreement (CBA) governing the vast majority of the industry workforce.

NEII requests that 296-96-00902(4)(b) be changed to align with the CBA language, as follows:

(4)(b) Is on the same job site as the helper/apprentice at least seventy-five percent of each working day when performing installations, alterations, repairs and callbacks; ~~There shall not be more than one helper/apprentice assigned to a licensed elevator mechanic at any time; The total number of helpers/apprentices shall not exceed the number of mechanics on any one job, except on jobs where two teams or more are working, one extra helper/apprentice may be assigned for the first two teams and an extra helper/apprentice for each additional three teams.~~
(Suggest changes in italics)

Thank you for the opportunity to provide the elevator industry's comments. NEII is committed to public and elevator personnel safety and is ready to support you

who would be impacted and should have an opportunity to weigh in on these changes.

The department intends to begin another rulemaking on the elevator rules in the next few months and you are encouraged to submit this proposed change as part of that process or you may file a formal petition for rulemaking with the department.

<p>in this process.</p>	
<p>Comment #2: 1. Revise WAC 296-96-00906 as follows:</p> <p>WAC 296-96-00906 ((What must you do to become a licensed)) <u>License requirements for elevator mechanics(?)</u>.</p> <p><u>(7) Qualify for licensing:</u></p> <p>(a) For conveyance work covered by all categories identified in WAC 296-96-00910 except <u>personnel hoists (04)</u>, material lifts (05), residential conveyances (06), residential inclined elevators (07) and temporary licenses (09), the applicant ((must))<u>shall</u> comply with the applicable mechanic licensing requirements as follows:</p> <p>(i) Test.</p> <p>(A) The applicant ((must)) <u>shall</u> provide acceptable proof to the department that shows the necessary combination of documented experience and education credits in the applicable license category (see WAC 296-96-00910) of not less than three years' work experience in the elevator industry <u>under the general direction of a licensed elevator mechanic</u> performing conveyance work <u>in the same category</u> as verified by current and previous employers licensed to do business in this state or as an employee of a public agency;</p> <p><u>Experience and education credits accrued based on working in the capacity as a temporary elevator mechanic shall not reduce the three years' work</u></p>	<p>Response #2:</p> <p>The department appreciates your participation in the Elevator program's rulemaking process. Your suggested rule change is substantially different from the rule proposed in the published notice of proposed rule adoption and will require a new rule-making procedure to adopt.</p> <p>Consistent with chapter 34.05 RCW, Administrative Procedures Act, this rulemaking included changes that adopted into rule long-standing department policy related to experience and licensing requirements. The Elevator program's current Education Policy, in place since November 7, 2012, does not prohibit experience and education acquired as a temporary mechanic from being counted toward the three years' work experience to qualify as an elevator mechanic.</p> <p>The rule does not change the existing rule requirement for temporary license applicants to have 75% of the education and training hours necessary for full licensing. However, the new rule does indicate the department may require temporary license applicants demonstrate more than seventy-five percent of education hours if multiple temporary licenses are requested. A temporary license holder should be continuing to pursue the education and training experience necessary to obtain a full license. Prohibiting the temporary license holder from counting the training and education would be a disincentive for temporary license holders from getting the experience and education necessary for full licensing.</p> <p>You may submit your proposal for this rule change during the next rulemaking cycle, which is expected to begin later this year. You may also file a formal petition for rulemaking with the department at any time.</p>

<p><u>experience required to qualify with WAC 296-96-00906(7)(a); and</u> <u>Acceptable proof may include department-approved forms documenting years of experience, affidavits, letters from previous employers, declarations of experience, education credits, copies of contractor registration information, etc. Additional documentation may be requested by the department to verify the information provided on the application; and</u> <u>(Suggest changes in italics)</u></p> <p><i>Rationale (for this comment): Working as a temporary mechanic does not replace the training and experience required for candidates to become eligible to achieve permanent licensure. Additional years of training and experience facilitate the preparation of a candidate to be adequately prepared to work within the full spectrum of scenarios presented by the elevator industry inclusive of a wide variety of hazards associated with said work.</i></p>	
<p>Comment #3: The proposed language contained in WSR 18-12-102 is not fully developed to adequately provide code language providing for the State of Washington’s safety and welfare, as evidenced by information presented that indicates questions as to whether the change to ASME A17.1-2016/CSA B44-16 was fully vetted to ensure it proactively mitigates and/or eliminates hazards and risk and provides for the</p>	<p>Response #3: The department appreciates your participation in the rulemaking process. The adoption of ASME A17.1/CSA B44 was reviewed and agreed upon by a Technical Advisory Committee (TAC) and the Elevator Safety Advisory Committee (ESAC) prior to being presented to the department for approval.</p> <p>The TAC was comprised of the following:</p> <ul style="list-style-type: none"> • 2 Elevator Advisory Committee Members (Non-Voting) • 1 Fire Marshall

<p>welfare of both the elevator industry’s workforce and the riding public. Additional concerns are apparent regarding the impractical requirement for educational credit facilitating the issuance of a temporary license, which negatively affects business owners operating in the State of Washington. Changes to the educational credit requirement have been previously agreed upon by a committee operating for and in the State of Washington yet are not evident in the proposed document. I recommend that this document’s approval be postponed pending further review by a board or committee comprised of a balance of interest that represents the safety and welfare of the State of Washington.</p> <p><i>Rationale (for this comment): To ensure public safety through the responsible development of code language which establishes the standards under which the Washington State Department of Labor and Industries operates.</i></p>	<ul style="list-style-type: none"> • 1 Elevator Labor Representative • 1 Grain Industry Representative • 2 L&I Inspectors (1 Supervisor and 1 Inspector) • 1 ASME Code Panel Member • 1 Engineer • 1 Testing Laboratory • 1 General Public Member • 3 Elevator Mechanics • 3 City Regulators (1 Supervisor and 2 Inspectors) • 3 Elevator Contractors • 3 Building Owners <p>The ESAC was comprised of representatives from the following interested parties:</p> <ul style="list-style-type: none"> • Licensed Elevator Contractors • Owner-Employed Mechanics Exempt from Licensing • Registered General Contractors • State Government, Secretary • Building Owners & Managers • Ad Hoc Member • Elevator Mechanics Licensed to Perform All Types of Conveyance Work <p>This was the first time in the history of the elevator program a Technical Advisory Committee (TAC) was convened to address proposed code changes. The process was so successful the elevator program will continue to utilize the TAC. As indicated by the membership on the committees above, your recommendation was addressed in the process.</p>
<p>Comment #4: Elevator Rules (Licensing): My comments relate to the Category 5 license. The proposal is to change the name</p>	<p>Response #4: Thank you for your comment. Your suggested rule change is substantially</p>

<p>for Material Lifts to Standard Application Material Lifts. To avoid confusion, the new name “Standard Application Material Lift” should replace all references to “Material Lift” in this section.</p>	<p>different from the rule proposed in the published notice of proposed rule adoption and will require a new rulemaking procedure to adopt.</p> <p>Changing all references to the phrase “material lifts” in the licensing section to “standard application material lifts” would mean that an elevator mechanic with a category 05 license could only work on standard application material lifts, as defined under the new rule, and not Type A and Type B material lifts covered in ASME A17.1/CSA B44, Part 7. Your comment does not provide a basis for limiting the type of material lifts that 05 licensed mechanics can work on safely.</p> <p>You may submit your proposal for this rule change during the next rulemaking cycle, which is expected to begin later this year. You may also file a formal petition for rulemaking with the department at any time.</p>
<p>Comment #5: With respect to licensing, this is really just a housekeeping matter. The current Category 5 license applies to installation, maintenance, inspection, decommissioning, and repair of material lifts. Under the proposed rules, the name -- that name is going to be -- is proposed to be changed to special application material lifts. And oddly enough, this phrase "material lifts" is especially confusing potentially here in the state of Washington because we have the WAC material lift which has been in place for well over 20 years, and that's what the Category 5 license is for, the WAC material lift. But now with the adoption of A17.1, section 7, the state of Washington will be -- is proposing to adopt A17.1 material lifts as well. So that's what drove the change in the name of a WAC material lift to a standard application material lift in</p>	<p>Response #5: Thank you for your comment. Your suggested rule change is substantially different from the rule proposed in the published notice of proposed rule adoption and will require a new rule-making procedure to adopt.</p> <p>Changing all references to the phrase “material lifts” in the licensing section to “standard application material lifts” would mean that an elevator mechanic with a category 05 license could only work on standard application material lifts, as defined under the new rule, and not Type A and Type B material lifts covered in ASME A17.1/CSA B44, Part 7. Your comment does not provide a basis for limiting the type of material lifts that 05 licensed mechanics can work on safely.</p> <p>The adopted rule language is consistent with the intent - Type A and Type B material lifts fall under the 05 material lift license.</p>

<p>the proposed code. So I think if that proposal passes, you know, if WAC material lifts are now going to be called special application material lifts, I think it would be important to change that in the licensing portion of the WAC as well to avoid confusion. It's a very narrow niche of the code in the industry, but it can be very confusing. And I know it's going to confuse -- it confuses me, so it probably confuses other people as well. I just want to avoid any delays in the future that might be caused by confusion over this issue.</p> <p>Inspectors, AHJ's, whatever it might be. So again, my proposal is very simple. It's just a housekeeping matter here. In Category 5, I propose that the change be that we further describe material lift as a special application material lift. And I think that would also apply to any other area in the licensing regulation where the word "material lift" is used, that should be changed to "special application material lift." The A17.1 material lifts are elevator devices. So I believe the intent would be to have the Category 1 license apply to that. I don't know if that's been brought up in any discussion. But I hope that's clear from my comments And I will submit some written comments in a very concise manner to confirm that.</p>	<p>You may submit your proposal for this rule change during the next rulemaking cycle, which is expected to begin later this year. You may also file a formal petition for rulemaking with the department at any time.</p>
<p>Comment #6: I'm looking over the modification to WAC 296-96-00902 with regards to elevator license requirements. And in the back it looks like there's some proposed changes regarding the ratio of apprentices to licensed journeyman mechanics. This seems to be in conflict</p>	<p>Response #6: The proposed changes relate only to Category 04 licenses and individuals who perform work on construction personnel hoists.</p> <p>The Washington State Apprenticeship and Training Council has the authority to</p>

<p>with the statutory requirements for the apprenticeship, both for our apprenticeship program and Local 19's apprenticeship program. Is this going to supersede or how -- I mean, who has jurisdiction? Who has authority in this case? If this change is made, does the apprenticeship division get notified and then we follow this WAC requirement? I'm just -- I'm unclear about what's going to happen. I think at this point that's the only question I have. And I'll also get that in writing to the Department by the 13th. But at this point that's the only question that I've got. Thank you.</p>	<p>approve apprenticeship program standards and has the authority to waive certain requirements for programs.</p> <p>The general rules regulating the ratio of apprentices to journey-level workers require a ratio of one-to-one. Where the applicable apprenticeship program standards require a one-to-one ratio, the standards govern until they are changed. Changes to existing program standards require approval from the Council.</p>
<p>Comment #7: WAC 296-96-00906, requirements for elevator mechanics (7) Qualifying for licensing: (a) For conveyance work covered by all categories identified in WAC 296-96-00910 except personnel hoists, Category 4; material lifts, Category 5; residential conveyances, Category 6; residential inclined elevators, Category 7; and temporary licenses, Category 9, the applicant shall comply with the applicable mechanic license requirements as follows: (i)(A) The applicant shall provide acceptable proof to the department that shows the necessary combination of documented experience and education credits in the applicable license category (see WAC 296-96-00910) of not less than three years' work experience in a conveyance work in the same category as verified by current and previous employers licensed to do business in the state or as an employee of a public</p>	<p>Response #7: The department appreciates your participation in the Elevator program's rulemaking process. This topic is outside the scope of this rulemaking. However, you may submit your proposal for a rule change during the program's next rulemaking cycle or you may file a formal petition for rulemaking with the department. We anticipate that we will begin accepting rule proposals in the next few months. If you file a formal petition for rulemaking, we will respond to your request within 60 days.</p> <p>Notification of upcoming rulemaking activity will be available on the L&I website at: http://www.lni.wa.gov/TradesLicensing/Rules/ByTrade/Elevator/Rulemaking.asp.</p> <p>Stakeholders will also be notified via GovDelivery. You can sign up for email updates at Elevatorsect@lni.wa.gov.</p>

<p>agency. Experience and education credits appear based on work in the capacity as a temporary elevator mechanic shall not reduce the three year work experience required to qualify with WAC 296-96-00906 (7); and accept proof -- acceptable proof may include department-approved forms documenting years of experience, affidavit, letters of previous employers, declarations of experience, educational credits, copies of contractor registration information, et cetera. Additional documentation may be requested by the department to verify the information provided on the application.</p> <p>And my rationale being working as a temporary mechanic does not replace the training and experience required for candidates to become eligible to achieve permanent licensure. Additional years of training and experience facilitate the preparation of a candidate to be adequately prepared to work within the full spectrum of scenarios presented by the elevator industry inclusive of the wide variety of hazards associated with said work.</p>	
<p>Comment # 8: The proposed language contained in WSR 18-12-102 is not fully developed to adequately provide code language provided for the state of Washington safety and welfare as evidenced by information presented that indicates the question -- that indicates questions as to whether the change to ASME A17.1-2016/CSA B44-16 was fully vetted to ensure it practically</p>	<p>Response #8: The department appreciates your participation in the rulemaking process. The changes for elevator licensing requirements, including educational credits for temporary licenses, were reviewed and agreed upon by a Technical Advisory Committee (TAC) and the Elevator Safety Advisory Committee (ESAC) prior to being presented to the department for approval.</p> <p>The TAC was comprised of the following:</p>

mitigates ample or eliminates hazards and risks and provides for the welfare of both the elevator industry workforce and the riding public. Additional concerns are apparent regarding impractical requirements for educational credit facilitating the issuance of temporary license, which negatively affects business owners operating in the state of Washington. Changes to the educational credit requirements have been previously agreed upon by a committee operating for and in the state of Washington yet are not evident in the proposed documents. I recommend that this document's approval be postponed pending further review by a board or committee comprised of a balance of interest that represents the safety and welfare of the state of Washington. My rationale. To ensure public safety through the responsible development of code language, which establishes standards under which the Washington State Department of Labor and Industry operates. I thank you.

- 2 Elevator Advisory Committee Members (Non-Voting)
- 1 Fire Marshall
- 1 Elevator Labor Representative
- 1 Grain Industry Representative
- 2 L&I Inspectors (1 Supervisor and 1 Inspector)
- 1 ASME Code Panel Member
- 1 Engineer
- 1 Testing Laboratory
- 1 General Public Member
- 3 Elevator Mechanics
- 3 City Regulators (1 Supervisor and 2 Inspectors)
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The ESAC was comprised of representatives from the following interested parties:

- Licensed Elevator Contractors
- Owner-Employed Mechanics Exempt from Licensing
- Registered General Contractors
- State Government, Secretary
- Building Owners & Managers
- Ad Hoc Member
- Elevator Mechanics Licensed to Perform All Types of Conveyance Work

This was the first time in the history of the elevator program a Technical Advisory Committee (TAC) was convened to address proposed code changes. This process was implemented based on recommendations from the 2016 Stellar Associated Inc. Elevator Program Report Performance Study. In addition, the Elevator Program solicited stakeholder input on the new process for elevator rule development using the TAC development and received positive support for the process.

	<p>Under the process, stakeholder proposals were solicited, a Technical Advisory Committee (TAC) was formed to review all stakeholder and department proposals, then the Elevator Safety Advisory Committee reviewed the proposals and TAC recommendations, Throughout this process, there were discussions on the impacts of the possible changes and whether the changes were code required.</p> <p>As indicated by the membership on the committees above, your recommendation to have a committee review the licensing and code rule proposed changes were addressed in the process.</p>
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