



# National Elevator Industry, Inc.

---

## CODE & SAFETY OFFICE

4034 North Hampton Brook Drive • Hamburg, New York 14075 • 585.302.0813 • Fax: 585.302.0841

www.neii.org • e-mail: bdblack@neii.org

**COMMENTS ON THE**  
**POST-HEARING MODIFICATIONS TO TEXT OF PROPOSED**  
**BUILDING STANDARDS**  
**OF THE**  
**CALIFORNIA BUILDING STANDARDS COMMISSION, DEPARTMENT OF HOUSING**  
**AND COMMUNITY DEVELOPMENT, DIVISION OF THE STATE ARCHITECT, THE**  
**OFFICE OF THE STATE FIRE MARSHAL, AND OFFICE OF STATEWIDE HEALTH**  
**PLANNING AND DEVELOPMENT**  
**TO**  
**CALIFORNIA CODE OF REGULATIONS, TITLE 24**  
**(CALIFORNIA BUILDING STANDARDS CODE)**

**June 23, 2011**

The National Elevator Industry, Inc. (*NEII*®) strongly supports the modifications proposed to those portions of the California Building Standards Code (CBSC) that will allow the elimination of fire sprinklers in the elevator hoistway, elevator machine room, elevator machinery space, elevator control space, or elevator control room where the companion requirements of the CBSC are met [§3006.4.1, §903.3.1.1.1, Chapter 35 Referenced Standards NFPA 13 - 8.15.5.6 and NFPA 72 – 21.3.6].

We appreciate the response of the Office of the State Fire Marshal to the comments we previously submitted, and agree that the proposed modification, if adopted, will have the potential to save thousands of dollars in the elevator installation and the required annual shunt-trip inspection and testing costs. They will also have a cost benefit for businesses and building owners by allowing elevator equipment that conforms to the nationally recognized codes and standards to be installed in California. Most importantly, these savings will be achieved without compromising the safety of building occupants, first responders, firefighters or elevator personnel, ensuring that the state will maintain its traditionally high level of life safety for its citizens.

As a trade association founded on the principle of providing safe building transportation for elevator riders and the general public, *NEII*® shares the goal of the California Building Standards Commission for building codes and standards that ensure such safety. We thank the Commission for its consideration of our comments and concerns in this rulemaking cycle.

Respectfully submitted,

Brian Black  
*NEII*® Code & Safety Consultant

**NEII ASSOCIATION HEADQUARTERS**

1677 County Route 64 • P.O. Box 838 • Salem, New York 12865-0838 • Phone: 518.854.3100 • Fax: 518-854-3257

NEII and NEII logo – Registered, U.S. Patent and Trademark Office