



# NEII

NATIONAL ELEVATOR INDUSTRY, INC.

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SETTING STANDARDS IN MOTION

**National Elevator Industry, Inc.  
Statement for the Record  
Hearing on Proposed Rule on Fire Service Access  
Elevator Annunciators**

**Submitted to  
Department of Buildings  
City of New York**

**New York, New York  
October 24, 2022**

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 over eighty-five percent of the work hours in the building transportation industry.

Requirement 3007.5.2 for Fire Service Access Elevators (FSAE) in the International Building Code (IBC-2021) states the following “When fire-fighters’ emergency operation is active, the entire height of the hoistway shall be illuminated at not less than 1 footcandle (11 lux) as measured from the top of the car of each fire service access elevator.” The proposed amendment to 3007-02(a) related to Fire service access elevator (FSAE) hoistway lighting allows for a three position ON-AUTO-OFF switch for Fire Service. NEII is concerned that the proposed amendment would allow for the “OFF” position to override the building code requirement to be on when Fire Emergency Operations (FEO) is active.

The amendment is unclear whether a switch in the “OFF” position would override the building code requirement when FEO is active. If the hoistway light switch overrides the FEO requirement when it is in the “OFF” position, it would deny firefighters improved visibility during any operation to move the elevator car during a fire. From a safety perspective, maintaining an illuminated hoistway would benefit emergency response personnel. NEII recommends maintaining the persistent hoistway lighting during firefighting operations.

Thank you for your attention to these important industry concerns. NEII is available, as are representatives from the NEII companies with operations in New York City, to provide additional information or meet to discuss any of the issues addressed by these comments in more detail. Please let us know if you have any questions.

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