

Opposition to proposed HB 236 as currently written:

1) Bill appears to be skewed to commercial passenger elevator companies

Recommend a credentialing category for accessibility equipment in public buildings.

The proposed licensing requirements appear based on commercial elevator products / components with no recognition of accessibility equipment which is often considered "an industry within the industry".

The language can be interpreted as an attempt to exclude companies and persons from performing work that they have been doing

2) The bill is touted as a public safety issue; but no data provided to support the claim.

If data is available it should be categorized appropriately (i.e., commercial elevator, equipment covered under A18.1 (a.k.a. accessibility equipment), and whether user error, equipment malfunction or lack of safety training / practices.

All equipment installed in a public building, whether it be elevators, vertical lifts, stairlifts etc. by current rule are permitted and inspected according to the national safety code of either A17 or A18. This has been in place for quite some time in terms of addressing public safety concerns.

The issue of worker safety is not only enforced by OSHA, but by additional safety training and modules a particular company subscribes to.

3) Over reach by institution:

Section 4785.03 stipulates entities not required to obtain a license provide the department a list of employees performing work. This is intrusive and unnecessary,

A contractor registration should be considered. This would also satisfy the language regarding coverage of liability and worker's compensation coverage. This would also reduce the strain on state personnel regarding administrative responsibilities.

- 4) Current language also indicates that persons installing a private residence elevator do not need to be licensed, but further language states that it can only be serviced by a licensed company or individual. This seems to be in conflict.

We realize and are sensitive to the importance of safety in all industries. We welcome practical sensible means that enhance this mind set.

However, the current language of this proposed bill appears to encompass more than just public safety.

Since it is much more practical and feasible for the committee, general assembly and more importantly the citizens and employers in the state to consider practical legislation prior to it becoming law I ask that this bill, as written not proceed and that further discussion be held to more fairly and appropriately meet the needs of the industry.

Thank you for your time and consideration.

Mike Simko

President,
Access Solutions, Inc.