



December 4, 2018, 2018

RE: HB 236 Testimony

To: The Ohio Senate Transportation, Commerce, and Workforce Committee  
Chairman Frank LaRose

Please accept these suggestions as they pertain to HB 236.

AEMA represents the accessibility industry and has, in many instances, provided guidance to local and state government bodies in consideration of the topics outlined in this particular bill.

As you consider trade licensing for elevator mechanics in Ohio, please know that we support the use of a limited license for accessibility elevator technicians, specific to our unique industry.

With the above recognized, we do, however, take issue with several requirements within your current proposed bill that we consider overly restrictive to competition, a liability and an additional burden being passed on to small, local businesses who have been selling and safely installing these types of products across Ohio for years, and not in the best interest of the end consumer from a safety and cost standpoint.

Please note the following:

- A. From an industry standpoint, reputable distributors have been factory trained by the equipment manufacturers, and have, at minimum, an individual who has gone through such training providing general supervision to installation crews. This has proven very effective, underscored by the excellent safety record within the industry.

**Recommendation:**

- i. **The practice listed above, requiring general supervision, be recognized as an adequate licensure requirement for products within this industry**
- B. For those states that wish to implement further requirements with a further focus on public safety, please know that the use of the accessibility and residential industry sponsored CAT (Certified Accessibility Technician) and CET (Certified Elevator Technician) programs have been very effective across the country. This training provides, and effectively verifies, the skills and competence required for technicians to safely install and service accessibility products (wheelchair lifts, incline lifts, and stair chairs), LU/LA elevators, and home elevators. To that point, please recognize the following points and subsequent suggestions:

- a. When addressing licensure requirements for products that fall into the home elevator or accessibility equipment category, CAT or CET certification are the preferred required training methods, advocated by the industry association
- b. It is common practice across the industry and many states to utilize general supervision as a cost effective means for training and addressing safety concerns. When speaking of the CAT or CET programs, a CAT-S (supervisor) or CET-S (supervisor) provides general supervision of installation crews and oversees all training as well.
- c. The installation of these types of products are typically done with small, two man crews, utilizing a single mechanic, who is at a minimum enrolled in the CAT or CET training, and a helper. This has not only proven to be a very safe installation method, but also the most cost effective for the end consumer.

**Recommendation:**

***i. We recommend your bill require for licensure a single, certified individual within a single company who is responsible for providing general supervision for installation and service of products.***

***1. This eliminates the cost burden on small businesses to have to employ fully licensed mechanics to undertake every facet of an installation and service, while still assuring safety is addressed adequately through general supervision.***

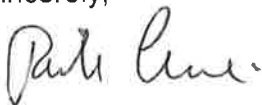
***2. It also addresses overly burdensome requirements faced by a small business, that larger organizations do not face to the same degree, due to potential turnover of said mechanics which can cripple a small business.***

C. As the bill is currently comprised, commercial elevator mechanics will be required to install accessibility lift/elevator products with which they are unfamiliar, as these are not typical commercial products. This, in our opinion, is neither the safest or most effective means of protecting the end consumer. Please recognize the following suggestion:

***a. Again, a CET or CAT enrolled and accessibility and/or elevator technician, under the general supervision of a CAT or CET-S, accomplishes this goal in a much more thorough and cost effective manner.***

Thank you for your consideration in this matter.

Sincerely,



Rick Crane, President