

From: Savannah Clarkston [mailto:sclarkston@neii.org]
Sent: Tuesday, January 31, 2023 8:58 AM
To: Madani, Mo <Mo.Madani@myfloridalicense.com>
Subject: Sect. 3009.2 FL Building Code Comments

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Mr. Madani,

I appreciate your help this morning and quick response. Attached you will find a cover letter and comments on Sect. 3009.2 from Kevin Brinkman, our Senior Director of codes for National Elevator Industry Inc. (NEII).

Please let me know if I can provide any additional information.

Thank you,

Savannah Clarkston
NEII • Assistant Director, Government Affairs
sclarkston@neii.org
(303) 862-2331 (cell)

2020 FBC, 3009.2

Each elevator car interior must have a support rail on at least one wall. All support rails must be smooth and have no sharp edges and must not be more than 1 1/2 inches (38 mm) thick or 2 1/2 inches (63 mm) in diameter. At least one support ~~Support rails~~ must be continuous and a minimum length of 42 inches (1067 mm) overall.

The inside surface of support rails must be 1 1/2 inches (38 mm) clear of the car wall. The distance from the top of the support rail to the finished car floor must be at least 31 inches (787 mm) and not more than 33 inches (838 mm). Padded or tufted material or decorative materials such as wallpaper, vinyl, cloth or the like may ~~be~~ not be used on support rails.

Rationale: To allow additional support rails of shorter lengths to better accommodate passengers with mobility limitations. The current language does not allow additional rails that are shorter than 42 inches.

Editorial clean up

FL Department of Business and
Professional Regulation, Florida
Building Commission
Attn: Mo Madani

Email: mo.madani@myfloridalicense.com

Re: NEII comments on the Florida Building Code (Eighth Edition - 2023)

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 represent over eighty-five percent of the work hours in the building transportation industry. As such, we welcome the opportunity to comment on the State of Florida proposed adoption of the 2021 suite of International Code Council building codes.

NEII would like to request a revision to Section 3009.2 of the Florida Building Code per the attached document. This section requires a support rail on at least one wall with additional requirements for location and design of the support rail. One of those requirements is that all support rails must be a minimum of 42 inches long. As written, if additional rails beyond the one required are provided, they must also be 42 inches in length. There may be circumstances where additional support rails are desirable to better accommodate passengers with mobility limitations but size constraints would not allow these additional rails to be 42 inches long. Please consider the revision shown in the attachment which would allow additional rails that are shorter to better serve accessibility needs.

NEII appreciates the opportunity to submit comments as the Florida Building Commission considers updates to the building code. Please do not hesitate to contact NEII's Senior Director of Codes, Kevin Brinkman at (309) 208-0812 or via e-mail at klbrinkman@neii.org if you have any questions or need additional information.

Regards,

Kevin Z Brinkman