



To: Our Valued Customers

Re: A message from the President of Custom Elevator Mfg. Co.

Custom Elevator is committed to producing the best quality products in the industry. We care about our customers and the safety of the end-users of our products. We will do our best to keep you apprised of updates to the regulatory codes applicable to all supply chain businesses in the private residential elevator industry, for the benefit of both you and the end-use consumers of our products.

You may be aware that the Consumer Product Safety Commission (“CPSC”) is investigating petitions alleging potential safety issues with residential elevators. The focus of the investigation concerns an association between the previously adopted ASME “3/5 rule” for installations of residential elevators and injuries to children which have been sustained while using residential elevators unsupervised. The CPSC is questioning whether the 3/5 rule was enough to protect children from injury.

On August 1, 2019, Ann Marie Buerkle, Acting Chair of the CPSC, issued a safety alert to consumers (a copy of which is attached) to protect children from a “deadly gap that may exist” between the inner elevator car door and the room access door (hoistway door). She recommended that consumers have a qualified elevator inspector examine their home elevators for this “dangerous gap and other potential safety hazards, inspecting to the latest safety standard, ASME A17.1-2016, Safety Code for Elevators and Escalators”. Ms. Buerkle also noted that dangerous gaps can be eliminated by placing space guards on the back of the room access door or installing an electronic monitoring device that deactivates the elevator when a child is detected in the gap.

The revised ASME residential elevator code¹ that Ms. Buerkle refers to above became effective May 20, 2017, but has not yet been formally adopted in every state. It contains updated car door deflection strength requirements, and further defines the rules for setback dimensions from the inside face of the hoistway door to the sill to prevent the possibility of entrapment on new installations. For this reason, on August 6, 2019 Ms. Buerkle issued a letter to the Governors of each state (a copy of which is also attached), urging them to review their requirements and procedures “to ensure that residential elevators are installed correctly and do not have a hazardous gap”.

At Custom Elevator, end user safety is paramount. Therefore, we have adopted the ASME A17.1-2016, Safety Code for Elevators and Escalators for all of our company’s elevator specifications and design drawings going forward, whether or not it is currently required by the state.

As an elevator manufacturer, we are not responsible for the installation of our products; instead, such is the responsibility of installers who at a minimum, must comply with applicable code. Over the years, we have consistently offered products that meet or exceed ASME guidelines, including several subframe alternatives to the 3/5 rule. Given the ongoing CPSC investigation of potential safety issues, and considering Ms. Buerkle’s recommendations, we urge you to schedule a service and safety checks with all of your residential elevator customers, past and present, at your earliest opportunity. If you are aware of any installation that exceeds the prior 3/5 rule, it is imperative for you to put your client on notice,



clearly and directly, that this poses a dangerous condition for children. Going forward, we strongly advise you to follow the updated standards for all new installations, whether or not it is currently required by the state.

We are proud to also have offered the same space guards and electronic monitoring devices mentioned by Ms. Buerkle, as well as additional consumer safety options, for years. These options can mitigate the risk of accidents to children if selected by the consumer. Realizing that the CPSC may find prior ASME standards insufficient to protect children from harm, we urge you to also recommend these safety options to all of your clients, past and present, so that they can make informed decisions about the products installed in their properties. If you or your customers have any interest in hearing about these safety devices, please feel free to contact us.

We are ready to answer questions and welcome the opportunity to advise you further. As always, we thank you for the privilege of serving your elevator needs.

ⁱ ASME A.17/CSA B44 – 2016 National Safety Code for Elevators – Section 5.3 Private Residence Elevators

Residential Elevator Warning/CPSC Letter to All 50 Governors to Change Building Codes

WASHINGTON, Aug. 7, 2019 /PRNewswire/ --



August 6, 2019

The Office of the Governor

Dear Governor:

I am writing to seek your assistance in protecting consumers in your State from a serious hazard associated with residential elevators. Specifically, some elevators installed in your jurisdiction may have excessive space between the elevator car door/gate (car door) and the hoistway or swing door (hoistway door). In some installations, the space between the elevator car door and hoistway door is large enough to allow children to fit between the closed doors. If a child becomes trapped in the space when the elevator is called to another floor, the child may be dragged inside the hoistway and crushed against the next floor's sill. The U.S. Consumer Product Safety Commission (CPSC) staff is aware of a total of nine (9) incidents associated with this product, including five fatalities involving entrapments between car and hoistway doors of residential elevators and a sixth where a toddler was trapped beneath the elevator.

The current version of the relevant safety standard, ASME A17.1-2016 *Safety Code for Elevators and Escalators*, limits the space between the car door and hoistway door to less than four inches. When reviewing a petition for a federal standard in 2017, the Commission concluded that the 4-inch standard would adequately address the risk of injury and would be widely complied with. However, more recent information indicates that some States have not updated building codes to incorporate the 2016 standard, and other States are not inspecting residential elevator installations to ensure that the relevant standard is being adhered to.

Last week I issued a [safety alert](#) (attached below) to consumers about the hidden hazard of residential elevators. For our part, CPSC will continue its investigations into this matter. Given the critical role of installers on the safety of this product, we are asking for your help in reviewing your requirements and procedures, to ensure that residential elevators are installed correctly and do not have a hazardous gap.

Should you have any questions on this matter, please feel free to contact my Acting Director for the Office of Hazard Identification and Reduction, Duane Boniface, at (301) 504-7671 or at dboniface@cpsc.gov. I thank you in advance for your assistance with this matter.

Sincerely,

Ann Marie Buerkle
Acting Chairman



United States
CONSUMER PRODUCT SAFETY COMMISSION

Safety Alert to Protect Children from a Deadly Gap between Doors of Home Elevators

August 1, 2019

Today, the Accessibility Equipment Manufacturers Association (AEMA) and the National Association of Elevator Contractors (NAEC) join me in warning consumers with home elevators and visitors to homes with elevators to protect small children from a deadly gap that may exist between the doors. The distance between the inner elevator car door and the room access door (hoistway door) on home elevators may be too wide, allowing a small child to enter the space and close the room access door without opening the elevator car door. If this happens, the child can be seriously injured or killed when the elevator moves.

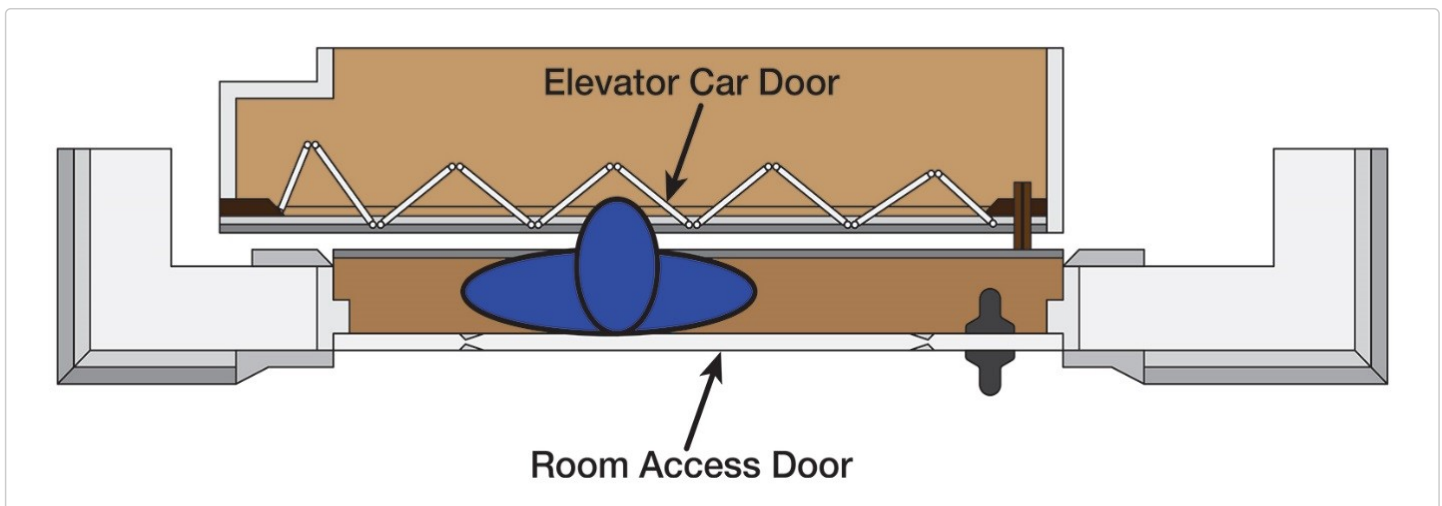
Residential elevators are commonly found in multi-level homes, townhomes, vacation homes and rentals, and in large homes that have been converted to inns or bed-and-breakfast hotels.

CPSC is aware of several tragic incidents in which children became entrapped between the doors leading to death, serious fractures, traumatic asphyxia, and lifelong injuries.

We are urging consumers to have a qualified elevator inspector examine their home elevator for this dangerous gap and other potential safety hazards, inspecting to the latest safety standard, ASME A17.1 Safety Code for Elevators and Escalators.

Dangerous gaps can be eliminated by placing space guards on the back of the room access door or installing an electronic monitoring device that deactivates the elevator when a child is detected in the gap. We also urge consumers to contact their elevator manufacturer or an elevator installer to obtain these critical safety devices and protect children from this hidden hazard.

We advise consumers to report any safety incident involving residential elevators at: www.SaferProducts.gov.



If the gap is too large, a small child can become entrapped between the room access door and the elevator car door.

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