SETTING STANDARDS IN MOTION

July 7, 2020

The Fire Prevention and Building Safety Commission of Indiana 302 W. Washington Street, Room E208 Indianapolis, Indiana 46204

RE: Commission Discussion and Action on Approving an Indiana Elevator Mechanic License Written Competency Examination [pursuant to Indiana Code § 22-15-5-12(b)(2)(B)]

Dear Members of The Fire Prevention and Building Safety Commission of the State of Indiana,

On behalf of the National Elevator Industry, Inc. (NEII), I am writing this letter in support of Indiana enforcing responsible reciprocity rules for elevator mechanic licenses.

NEII is the premier national trade association representing the interest of firms that install, maintain and/or manufacture elevators, escalators, and other building transportation products, including parts or components. The NEII membership includes the top elevator companies in the United States and Indiana, which account for more than eighty percent of the work hours for the industry nationwide.

NEII supports licensing requirements that verify the people working on complex elevator and escalator systems can demonstrate a fundamental competency and apply their skills capably to the current safety rules and procedures. Elevator mechanics can qualify for licensure in Indiana by meeting one of the following four options: 1) holding a license in another state with equivalent licensing standards; 2) completing a nationally accredited elevator safety education training program; 3) showing the necessary amount of on-the-job training and then passing a state administered exam; or 4) by grandfathering into the program from past tenure. Indiana clearly shares NEII's goal to ensure that all licensed elevator mechanics have the appropriate training and education necessary to work on elevator and escalator equipment.

These important licensing rules, however, lose their value when reciprocity is granted to states with inferior regulations. Indiana's strong licensing requirements are in place to protect passengers, mechanics and inspectors from exposure to safety equipment that has been serviced by mechanics without a baseline level of training. Allowing mechanics from states with lax standards to work on equipment in Indiana weakens the intent behind Indiana's strong licensing laws. If there are reasonable doubts that another state's program is not equivalent, it is entirely appropriate to deny reciprocity and require an additional competency examination.

NEII appreciates the opportunity to provide comments and representatives are available to answer any questions. Thank you for your time and attention to this important industry issue.

Sincerely,

Dylan Isenberg

Director, Government Affairs

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