



## Office of the State Fire Marshal

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**DATE:** May 18, 2011

**TO:** All State Licensed Contractors and Inspectors  
All Illinois Municipalities Party to a Local Agreement with the OSFM  
All Illinois Municipalities Without a Local Agreement with the OSFM

**FROM:** Robert Capuani

**RE:** Board Interpretation: ASME A17.1 §8.6, Maintenance Control Program and Maintenance Records

At the May 12, 2011 meeting of the Elevator Safety Review Board (“Board”), the Board took notice of the confusion surrounding the actions and/or documentation which constitute compliance with ASME A17.1, Sections 8.6.1.2.1 (“Maintenance Control Program”) and 8.6.1.4 (“Maintenance Records”). As noted at the meeting, while the OSFM had requested interpretations from ASME of these issues, there is no anticipated date by which the ASME response will be received. The Board was, therefore, asked to issue a temporary interpretation, pending and subject to any guidance ultimately issued by ASME, if any.

Following public comment and discussion, the Board unanimously concluded that the Maintenance Control Program and Maintenance Records do not have to be physically located at the maintenance site in order to comply with ASME A17.1, §§ 8.6.1.2.1 and 8.6.1.4. Therefore, Illinois-licensed elevator inspectors need only confirm that a Maintenance Control Program and Maintenance Records exist, which can be accomplished in one of two ways. First, the inspector can verify the presence of instructions for locating the Maintenance Control Program and Maintenance Records either in or on the controller, along with instructions on how to report any corrective action that might be necessary to the responsible party. Second, the inspector can verify the presence of a Maintenance Control Program and Maintenance Records in or on the controller. The Board’s interpretation shall remain in effect until, and if, an interpretation is issued by ASME which contradicts or otherwise differs from the Board’s decision.

Nothing in this interpretation should be construed as exempting any Illinois-registered conveyance (new or existing) from current compliance with the A17.1 requirements concerning Maintenance Control Programs and Maintenance Records as interpreted by the Board. Conveyances which do not meet these requirements are in violation of Code, and will have 30 days to achieve compliance *unless* the relevant Local Administrators have granted an exception/variance from the Code. A list of the Local Administrators which have granted such exceptions will be available on the OSFM website.