

Position of the International Union of Elevator Constructors – Maine Jurisdiction on L.D. 2224 (S.P. 907)

Chair, Members of the Committee:

On behalf of the International Union of Elevator Constructors (IUEC), representing elevator constructors working throughout the State of Maine, we appreciate the opportunity to provide comments limited to Sections 2 and 3 of this bill.

Smoke Partitions at Elevator Hoistway Doors

The IUEC's mission is life safety. National model codes such as the International Building Code are developed through extensive, transparent processes and are vetted by subject-matter experts in fire protection, building science, engineering, and emergency response. These provisions are not arbitrary; they are the product of technical review, public input, and consensus among professionals whose expertise is life safety.

If the Legislature is considering deviating from a vetted national life-safety code provision, it is critical that the decision rely squarely on the appropriate local experts in that discipline, specifically, the State Fire Marshal's Office and Maine's fire service community. Smoke migration, stack effect, compartmentation strategy, and firefighter staging are fundamentally fire protection issues. Those who operate in fire conditions are best positioned to determine whether removing a smoke partition requirement maintains an equivalent or greater level of safety.

The IUEC will comply with whatever standard is enacted. However, we strongly urge that no statutory deviation from smoke partition requirements be adopted without direct consultation and clear support from Maine's fire safety professionals. Life-safety provisions should not be modified without the express guidance of those experts.

Elevator Emergency 2-Way Communication (Audio/Visual)

The IUEC supports the intent of modern 2-way communication systems that include both audible and visual capability. These systems enhance accessibility, improve emergency communication reliability, and align with the broader direction of national safety standards.

We also recognize that telecommunications infrastructure in certain rural areas of Maine may not yet consistently support advanced audio/visual systems. Mandating uniform implementation where infrastructure cannot sustain reliably it may create compliance challenges without producing meaningful safety improvements.

Accordingly, we support maintaining permissive language in the near term to allow flexibility where infrastructure limitations exist, while signaling the State's long-term objective of full implementation as infrastructure capacity improves. This balanced approach advances safety while acknowledging present-day practical realities.

Need for a State Elevator Advisory Board

In addition to these two comments on this legislation, the IUEC Local 4 strongly believes that Maine would benefit from establishing a State Elevator Board that could help to improve oversight and best practices when reviewing future code changes and adoptions. This is especially true as elevator technology and codes continue to rapidly evolve. Such a board would provide technical expertise, balanced input, and transparency while ensuring adopted requirements are practical, enforceable, and aligned with Maine's regulatory framework.