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GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF LICENSING AND REGULATORY AFFAIRS
LANSING

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ACTING DIRECTOR

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The Bureau of Construction Codes (BCC) has received many questions regarding the implementation of the ASME A17.3 code that became effective June 27, 2023, and to provide transparency and open communication with those impacted by this code, the below questions and answers are provided.

1. What is ASME A17.3?
    a. ASME A17.3 is a baseline safety code for existing elevators and escalators and was created to ensure that devices installed or updated prior to the present code requirements all meet a basic minimum safety standard.
2. I received a letter from my elevator contractor stating I am required make updates to my elevator or escalator, is this true and what are the deadlines?
    a. The requirements from A17.3 may or may not apply to your specific device. If it does there is a tiered timeline approach to allow building owners to have sufficient time and resources to comply with these basic national standards. Here is the link with specific information: New Elevator Rules Announcement. The implementation dates of this standard start on page five. The first set of standards start on January 1, 2025, and the last set have an effective date of January 1, 2028.
    b. Violations can only be issued by a BCC elevator inspector after the date the standard becomes effective and will mostly likely occur after an annual inspection has been conducted.
3. How do I know if I really need this update?
    a. You may enlist the professional services of any Michigan licensed elevator contractor to determine the requirement.
    b. If a building representative is present during your next BCC annual inspection, they can request that the elevator inspector verify if the functionality is present already.
    c. Please note: many devices that were installed or that underwent significant upgrades after a certain date may already be equipped with some of the required safety features. Ask your chosen elevator contractor to come on-site and verify if your device is already equipped and compliant. You may also want to get a second opinion from another elevator contractor.

4. Do I have to use the same elevator contractor that I use for my maintenance for these upgrades?
    a. We understand that building owners may be receiving quotes from their elevator contractor with whome they have a service and maintenance contract. Since this is a national standard, other elevator contractors and manufacturers will also be able to provide these upgrades. There is no requirement for the elevator company that is performing maintenance to also perform any upgrades or alterations to your elevator. However, you are required to use a Michigan licensed elevator contractor, and the State of Michigan has many elevator contractors who are licensed and qualified to perform this work.
5. My elevator contractor told me I can request a variance, what does this mean?
    a. You can request a variance from the Elevator Section which allows a building owner or contractor to either provide an alternate means of compliance or to state their basis for hardship that will be caused by compliance. In order to apply for a variance, please work with your elevator contractor to fill out the variance form found here: Variance Request Application. Complete the form in its entirety and email to elevsafety@michigan.gov for review and application processing.

If there are any further questions related to the adoption to ASME A17.3 or any other codes, please feel free to contact the Elevator Section at elevsafety@michigan.gov.

Sincerely,

Andrew Brisbo
Bureau of Construction Codes
Director