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Division of Occupational Safety and Health  
ELEVATOR UNIT HQS  
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May 27, 2011

**CIRCULAR LETTER E-10-06**

**TO: Installers, Manufacturers of Conveyances and Related Equipment and,  
Other Interested Parties**

**SUBJECT: Devices Which Remotely Interact With Conveyances**

It has come to our attention that devices have been installed on conveyances which interact remotely to change parameters, check and reset faults, open and close doors and various other functions.

Section 7311.2(a) of the California Labor Code states in part: "Any person who, without supervision, erects, constructs, installs, alters, tests, maintains, services or repairs, removes, or dismantles any conveyance covered by this chapter, shall be certified as a certified competent conveyance mechanic by the division."

Devices which interact remotely with conveyances are not covered in Title 8 regulations. The California Labor Code Section 7318 allows the Division to promulgate special safety orders in the absence of regulations. The Division believes that a hazard can be created by the installation of these devices. Section 7311.2(a) precludes individuals who are not certified by the Division from interacting with the controls of a conveyance. The Division is issuing this special order to address this issue.

Pursuant to Sections 7305 and 7312 of the California Labor Code, the Division will remove from service any conveyance found operating with a device which can remotely effect a change in its controls.

Devices which monitor the operation of a conveyance remotely have been accepted, and will continue to be accepted.

Devices which monitor or interact with the controls of a conveyance from within the building or complex in conformance with the Elevator Safety Orders will continue to be accepted.

This circular does not preclude remote interactive diagnostics which requires a Certified Competent Conveyance Mechanic to physically grant permission to take control while in his or her presence.

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