

Subject: Use of Elevator Security Keys for Construction Use Elevators

Issue: What Elevator Security Keys permitted to be used for “Construction Use Elevators” by Non-Elevator Personnel?

Background: There may have been an incorrect industry understanding, which has come to AEDARSA’s attention concerning the use of **elevator keys** permitted to be used for “Construction Use Elevators” by Non-Elevator Personnel.

Construction Use Elevator(s) must comply to ASME A17.1/CSA B44 Safety Code for Elevators and Escalators, Section 5.10 as well as, Part 8 including Section 8.1 Security.

See also Part 8 for additional requirements that apply to elevators used for construction.

NOTE: Requirements 8.1, 8.6, 8.7, 8.9, 8.10, and 8.11 apply to both new and existing installations.

Group 3 keys, specifically the FEO-K01, being issued to the General contractor for use as a means of operator control of the elevator, by *Authorized Personnel*. The operator would activate the fireman emergency stop switch to hold the elevator at a floor. Therefore, negating the intended use of the Firefighters Emergency Operation (FEO) function.

The requirement for the use of elevator security keys is set out in Elevating Devices Codes Regulation AR 192/2015 under the adopted ASME A17.1/CSA B44 Section 8.1 that has four (4) separate parts as follows:

1. Group- 1 Restricted – (Elevator Personnel - Mechanics)
2. Group-2 Authorized Personnel (Persons who are specially trained to perform a certain task)
3. Group-3 Emergency Operation (Trained emergency responders and mechanics)
4. Group-4 Other

ASME A17.1 Code interpretations clarify the intended use of the FEO function:

[Inquiry 03-41](#)

Subject: Section 3 – Definition of “Designated Attendant”

Edition: A17.1 – 1996

Question: The definition for "designated attendant" states that this term applies whenever elevator operation is controlled from inside the car, and the examples of this are listed as "attendant service, independent, hospital service, and other similar operations". Fire Phase II operation would seem to be a rather conspicuous omission from this list.

Is the elevator considered as being operated by a designated attendant during Fire Phase II operation? If not, then, for the purpose of this definition, what distinguishes Fire Phase II from any other "designated attendant" type of operation?

Answer: No. It is the intent that Phase II operation is used by emergency personnel only, not authorized personnel.

A17 Committee Approval: January 14, 2004

TYPE: Information	Construction use Elevators – Operator Control	REGULATION: Elevating Devices Code
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Alberta Elevating Devices
& Amusement Rides
Safety Association

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[Inquiry 05-02](#)

Subject: 8.1

Security Edition:

A17.1-2000

Background: The Independent Service switch is not mentioned in any of the security groupings 1 through 3.

However, under the following definitions Independent Service is equated with authorized personnel.

"Designated attendant --- where elevator operation is controlled solely by authorized personnel (attendant service, independent, hospital service, and other similar operations)."

"Authorized personnel --- persons who have been instructed in the operation of the equipment and designated by the owner to use the equipment."

Questions:

- (1) Since the Independent service switch is not mentioned under security groupings 1 thru 3, must it fall under Group 4? (Equipment not classified as group 1, 2 or 3)
- (2) By reading the definitions for Designated Attendant is Independent Service permitted to be keyed under group 2 security?
- (3) Is it permitted to combine the car light key switch listed under 8.1.3(d) and fan key switch, which is not listed in any grouping, under one key switch which is security group 2?
- (4) Is a toggle switch that is used for Independent Service operation of an elevator permitted to be placed behind a locked panel having a group 2 key along with other toggle switches that are group 2?
- (5) Can a group 3 device be placed behind a locked cover, which uses a group 2 key to open the locked cover?
- (6) 8.1.2 thru 8.1.5 uses a "Note" to define types of access/operations. Is the "Note" an enforceable part of the rule?

Answers:

- 1) No.
- 2) Yes, if it is used only by authorized personnel.
- 3) Yes, if it is used only by authorized personnel.
- 4) Yes, if it is used only by authorized personnel.
- 5) No.
- 6) No. See form and arrangement paragraph in preface.

A17 Standards Committee Approval: May 18, 2005

TYPE: Information	Construction use Elevators – Operator Control	REGULATION: Elevating Devices Code
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Requirements:

ASME A 17.1 2.27.8 Switch Keys

The key switches required by 2.27.2 through 2.27.5 and 2.27.11 for all elevators in a building shall be operable by the FEO-K1 key. The keys shall be Group 3 Security (see Section 8.1). A separate key shall be provided for each switch. These keys shall be kept on the premises in a location readily accessible to firefighters and emergency personnel, but not where they are available to the public. This key shall be a tubular, 7-pin, style 137 construction and shall have a biting code of 6143521 starting at the tab sequenced clockwise as viewed from the barrel end of the key; cutting depths shall be in accordance with Figure 2.27.8. The key shall be coded "FEO-K1." The possession of the FEO-K1 key shall be limited to elevator personnel, emergency personnel, elevator equipment manufacturers, and authorized personnel during checking of Firefighters' Emergency Operation (see Section 8.1 and 8.6.11.1).

Where provided, a lock box, including its lock and other components, shall conform to the requirements of UL 1037 (see Part 9). NOTE (2.27.8): Local authorities may specify additional requirements for a uniform keyed lock box, and its location, to contain the necessary keys.

To ensure that a reasonable degree of control of keys being used during the construction use phase is being maintained, the following requirement MUST be adhered to.

1. Only Security Group 4 elevator security keys will be issued by the elevating devices service provider to a building contractor or their staff during the construction use phase.
2. No key groups changes can be made to devices. Example: If the ASME A17.1/CSA B44 Section 8.1 states that it is group 3 key it cannot be changed with a group 4 key.
3. Elevator service provider mechanics are permitted full access to all elevator security key groups 1 through 4.

Note: Failure to comply with the above requirements may result in the elevator being removed from service and the Permit of Operation cancelled.

Implementation: Effective August 1, 2021.

Original signed by:

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