



CHERIE BERRY
COMMISSIONER

TOMMY PETTY
ACTING BUREAU CHIEF
ELEVATOR AND AMUSEMENT DEVICE BUREAU

MEMORANDUM

To: All Elevator Companies and Elevator and Amusement Device Bureau

From: Tommy Petty, Acting Bureau Chief of Elevator and Amusement Device Bureau
Jeff Cole, Supervisor of Inspections, Elevator and Amusement Device Bureau

Date: September 25, 2020

Re: Door reopening Device

Door Reopening Device Replacement or Alteration

Definition as per A17.1:

replacement: The substitution of a device or component and/or subsystems, in its entirety, with a unit that is basically the same as the original for the purpose of ensuring performance in accordance with applicable Code requirements. (See also maintenance and repair.)

As per the above definition, it is our understanding and position after further review that a door reopening device change will not be considered an alteration on a (repair/replacement) or like for like replacement (i.e. 2D detector to a 2D detector), however; if you have a photo eye and safety boot and change to an infrared curtain, this is an alteration and will require you to install a 3D detector. A permit will be required for both to ensure the detector is installed and works according to the applicable code.

Thank you all for your attention to this.

tp/cl