



Senate of Pennsylvania

October 10, 2025

Joseph P. Marchioni, Jr.
Acting Director
Bureau of Occupational and Industrial Safety
Pennsylvania Department of Labor and Industry
651 Boas Street, Room 613
Harrisburg, PA 17121

Dear Director Marchioni,

As chair of the Senate Labor and Industry Committee and as the prime sponsor of legislation creating the Elevator Safety Board, respectively, we have reviewed proposed rulemaking #12-123, related to elevator safety standards under the Uniform Construction Code. The proposed regulations are much needed as Pennsylvania currently has one of the oldest elevator and escalator codes in the nation.

It is critically important for our elevator workers, inspectors and residents that we modernize our codes to ensure safety and reliability of elevators and other lifting devices. In fact, we led the effort last legislative session to modernize the code statutorily through Senate Bill 1230. That process was halted when the department committed to updating the code under authority it already possesses through the regulatory process. We appreciate the department's fulfillment of its promise to work with the Elevator Safety Board to promulgate these proposed regulations. It is our understanding that the International Union of Elevator Constructors, Pennsylvania Society of Professional Engineers and Elevator Industry Work Preservation Fund have all expressed support.

The regulatory package notes that expenses will increase for building owners and government entities because of annual testing. However, we believe the safety benefits of protecting life and property far outweigh the costs. With that in mind, we support proposed rulemaking #12-123 as being in the public interest.

Thank you for the opportunity to provide comments. We would be happy to further discuss the regulation with the department as you continue work on the final rulemaking.

Sincerely,

A handwritten signature in black ink, appearing to read "Devlin J. Robinson".

Senator Devlin J. Robinson
Chair
Labor and Industry Committee

A handwritten signature in black ink, appearing to read "Lisa Baker".

Senator Lisa Baker
Chair
Judiciary Committee

