Interpretations

Each interpretation applies to the edition and supplements listed for that inquiry. Many of the Rules on which the interpretations have been made have been revised in later editions or supplements. Where such revisions have been made, the interpretations may no longer be applicable to the revised requirement.

ASME procedures provide for reconsideration of these interpretations when or if additional information is available which might affect any interpretation.

Further, persons aggrieved by any interpretation may appeal to the cognizant ASME committee or subcommittee. ASME does not "approve," "certify," "rate," or "endorse" any item, construction, proprietary device, or activity.

Approved A18.1 Interpretations

Interpretation: 01-01
Subject: Para. 2.7.1
Edition: A18.1-1999 up to and including A18.1a-2001
Date of Issued: January 18, 2001

Question (1): A vertical platform lift is not allowed to penetrate a floor (A18.1-1999); however in the addenda (A18.a-2001) the wording penetrate a floor has been deleted. Is it the intent of the code (once adopted) to allow vertical platform lift’s to penetrate a floor, if so;

  Reply (1): Yes.

Question (2): Does this lift have to be in its own hoistway with the hoistway penetrating the floor,

  Reply (2): The lift must be installed in a runway conforming to para. 2.1.1 of the Standard and conform to the building code.

Question (3): Or is the intent of this addenda to allow vertical platform lift’s in stairwells or corridors to serve perhaps a balcony or mezzanine level not penetrating a floor at four sides but just to serve the outside landing at that floor?

  Reply (3): This application would also be permitted provided the requirements of the Standard are followed.

Interpretation: 01-02
Subject: Para. 1.1.1
Edition: A18.1-1999 up to and including A18.1a-2001
Approved A18.1 Interpretations

Date of Issued: January 18, 2002

Question: Does a product primarily used for the transportation of able bodied persons as a stairway and infrequently used as a lift by mobility impaired persons fall under the scope of A18 which states that devices under the scope are “intended for transportation of a mobility impaired person only”.

Reply: Yes. When the device is no longer used as a stairway but is being used as a platform lift, it falls under the scope of A18.

Interpretation: 01-03

Subject: Para. 3.10.1
Edition: A18.1-1999 up to and including A18.1a-2001
Date of Issued: May 8, 2002

Question (1): Does para. 3.10.1 allow movement of the lift from control switches located at the top and bottom floor level?

Reply (1): Yes, provides that a control station is also located on the platform.

Question (2): Does para. 3.10.1 allow movement of the lift from multiple control switches located at any floor level?

Reply (2): Yes.

Question (3): Does para. 3.10.1 allow the lift to operate from any floor level control switch without the operator being able to see the lift?

Reply (3): Yes.

Question (4): Does para. 3.10.1 allow an operator to move the lift with any floor switch when the platform is out of sight and in the folded up position?

Reply (4): Yes. The Standard does not specify whether or not the platform is folded or unfolded.

Question (5): Does para. 3.10.1 allow an operator to move the lift with any floor switch when the platform is out of sight and in the folded down position?

Reply (5): Yes.

Interpretation: 02-01

Subject: Section 2.10
Question (1): The words “keyed operation” have been removed. (1) Is this section removing the off/on key switch as a requirement and allowing it to be an option or is it not permitting the key to be installed at all?

Reply (1): The Standard neither requires nor prohibits the use of a key.

(2) If the answer to Question (1) is yes, does this section allow for installation of wheelchair lifts designed and built prior to April 11, 2002 (Date of issue for addenda) or must they be modified into compliance?

Reply (2): This Standard neither requires nor prohibits the use of a key.

Interpretation: 02-02

Subject: Section 2.7


Date of Issued: January 13, 2003

Question:

a) ASME A18.1, section 2.7 specifies, "Travel shall not exceed 12 feet."

b) Literature published by a major manufacturer identifies travel distance as "H" for pit mount and floor mount as shown on the attachment.

We have had questions from knowledgeable persons who maintain that the travel distance shall be measured from landing irrespective of pit depth; moreover, a ramp can reduce the measured travel distance. Please advise.

Reply: Travel is defined in A18.1 section 1.3 as “the vertical distance between the bottom terminal landing and the top terminal landing.” Landings are also defined in the Standard. This distance does not include pit depth.

Interpretation: 03-01

Subject: Para. 3.10.1 Key Operation

Edition: ASME A18.1-1999 up to and including A18.1a-2001

Date of Issued: June 16, 2003

Question: Does paragraph 3.10.1 mean that keyed controls are not necessary to operate inclined platform lifts?

Reply: Yes.
Interpretation: 03-02

Subject: Paras. 2.1.1.7 and 2.1.2.1
Date of Issued: December 18, 2003

Question: Does the standard permit the sidewall configuration where the ends of the sidewalls are set back 2 – 3 inches?
Reply: Yes.

Interpretation: 04-01

Subject: Paragraph 1.1.1 Equipments Covered by This Standard
Date of Issued: June 16, 2004

Question: Is it permitted for a lift which is used to transport mobility impaired persons to also serve as a stationary platform for people without disabilities (e.g., when it serves as a platform of a witness stand in a courtroom)?
Reply: Yes.

Interpretation: 04-02

Subject: Paragraphs 2.1.1.4, 2.1.2.4, and 2.1.3.7 Mechanical Lock Failure
Date of Issued: June 16, 2004

Question (1): If a lift moves away from the landing more than 2 inches before the lock is locked and then stops, can it return to the landing to allow the user to exit the lift provided the door is closed with door contacts closed?
Reply (1): No.

Question (2): A lift is located between floors and a mechanic manually opens a gate or door, the contacts monitoring the lock fall, but the door close contacts make when the door or gate is shut. Can the lift be allowed to travel to the respective landing that was manipulated as long as it will not run away to an opposite landing?
Reply (2): No.
Approved A18.1 Interpretations

Interpretation: 04-03
Subject: Paragraph 1.1.1 Limitation of Travel on Inclined Platform Lifts
Edition: ASME A18.1-1999 up to and including A18.1a-2001
Date of Issued: June 16, 2004

Question (1): Whereas vertical and inclined platform lifts are mentioned in the same paragraph under Scope, do inclined platform lifts have the same limitations of travel as stated under 1.1.1 as vertical lifts?

Reply (1): No.

Question (2): Is there a limitation of travel imposed on straight run inclined platform lifts?

Reply (2): No.

Question (3): Is there a limitation of travel imposed on inclined platform lifts when installed in a stair tower with the platform turning multiple 90 and 180 degree turned and the lift traveling to multiple floors?

Reply (3): No.

Interpretation: 04-04
Subject: Paragraph 2.1.2 Runaway Enclosure Not Provided
Date of Issued: June 16, 2004

Question (1): When a runway enclosure is not provided, does the bottom landing require a landing door?

Reply (1): The area under the platform shall be fully enclosed by smooth guards, either telescoping or stationary on all accessible sides. Either telescoping panels or a landing door could fulfill this requirement on the lower landing entrance side.

Question (2): Does the ramp on the platform lift meet the intent of the code or is a full toe guard or shutter type [telescoping] guard required?

Reply (2): See reply to question 1.

Question (3): Can an underside car platform device be used in lieu of a door?

Reply (3): No.
Interpretation: 04-05

Subject: Paragraphs 2.1.1 and 2.1.2 Runway Enclosure Provided and Partial Runway Enclosure Provided


Date of Issued: June 16, 2004

Question (1) What is the difference between partial runway enclosure provided (2.1.2) and runway enclosure provided (2.1.1)?

Reply (1): The area under a platform conforming to 2.1.1 is guarded by a solid enclosure to a height of 42 inches minimum above the uppermost landing. For a lift conforming to 2.1.2, this area is guarded by either telescoping or stationary panels. A platform gate guarding the lower landing side is also required on a lift conforming to 2.1.2.

Question (2): Does this mean the lower landing does not have to be enclosed?

Reply (2): No.

Question (3): Can a gate or door at the lower landing serve as a stationary guard?

Reply (3): Yes.

Interpretation: 04-06

Subject: Section 10.4 Acceptance Inspections and Tests, with reference to Private Residence Inclined Stairway Chairlifts


Date of Issued: June 16, 2004

Question (1): Does the Code require a platform safety test with rated load test on an inclined stairway chairlifts?

Reply (1): Yes.

Question (2): If so, what are the proper procedures to ensure the safety of personnel when loading weights onto a seat?

Reply (2): The A18.1 Standard does not have a written procedure to load weights onto an inclined stairway chairlifts.

Interpretation: 04-07

Subject: Para. .1.1 Runways
Question: Should the free space as required in paragraph 7.1.1 be only measured when the chair is parked at the ends or also when it is in the middle of its travel?

Reply: The standard does not specify where the lift is to be located when the 20 in. free passage width measurement is taken.

Interpretation: 04-08

Subject: Para. 2.10.6 Emergency Stop Switch


Date of Issued: October 26, 2004

Question: Is an Emergency Stop Switch required on the landing operating panels?

Reply: No.

Interpretation: 04-09

Subject: Paragraph 10.4.2


Date of Issued: February 1, 2005

Question: How is the governor operated safety device testing at full speed performed on Inclined Stairway Chairlifts?

Reply: Lift with Type A governor-operated safeties shall be tested by operating the platform (in the case of inclined stairway chairlifts “carriage”) at its normal speed in the down direction and manually tripping the governor jaws.

Interpretation: 04-10


Subject: Paragraph 1.1.1

Date of Issued: July 23, 2007

Question (1): Does section 2.7.4 prohibit the use of platform lifts to transport freight?
Reply (1): Yes.

Question (2): In the event that a person with a mobility impairment is on a different floor level from his or her mobility device, would it be permissible to transport that mobility device to them using a platform lift?

Reply (2): The standard does not address this issue.

**Interpretation: 06-01**

Subject: Paragraph 2.3.8, Location of Driving Machines

Edition: ASME A18.1-1999 up to and including A18.1-2005

Date of Issued: February 13, 2006

Questions (1): Can a driving machine be located remotely from the machine framework and runway enclosure?

Reply (1): Yes.

Question (2): If yes, and if the machine is located outside of the runway enclosure:
   (a) Is there a minimum illumination level required at the machine?
   (b) Is a work receptacle required?
   (c) If the driving machine is self-contained with integral access panels that are screwed, locked or bolted in place, must it additionally be enclosed in a machine room, cabinet, closet, etc?
   (d) If permitted to be in the open, does the guarding refer only to moving parts? Can non-moving parts such as a hydraulic valve be exposed?
   (e) If one chooses to place the machine in its own room:
      (1) Must the enclosure be fire-rated?
      (2) Is a fire extinguisher required adjacent to the machine?
      (3) Is ventilation required?
      (4) Does it require a self-closing and/or self-locking door?

Reply:
(2)(a) No.
(2)(b) No.
(2)(c) No.
(2)(d) No.
(2)(e) (1)-(4) No, there are no “machine room” requirements in A18.

**Interpretation: 06-03**

Subject: Paragraph 2.1.1.7 Running Clearance

Edition: ASME A18.1-1999 up to and including A18.1-2005
Interpretation: 06-04

Subject: Paragraph 2.1.5 Pits

Edition: ASME A18.1-1999 up to and including A18.1-2005

Date of Issued: August 8, 2006

Question (1): Is there any limit for the maximum depth of a pit?


Question (2): Is a pit ladder ever required?

Reply (2): No, the Standard does not address pit ladders.

Question (3): Is a separate pit access door ever required?

Reply (3): No, the Standard does not address separate pit access door.

Question (4): Is a pit light ever required?

Reply (4): No, the Standard does not address pit lights.

Question (5): Is a pit receptacle ever required?

Reply (5): No, the Standard does not address pit receptacle.

Question (6): Is a pit stop switch ever required?

Reply (6): No, the Standard does not address pit stop switches.

Question (7): Is there any requirement for preventing the entry of ground water into a pit?

Reply (7): No, the Standard does not address ground water entry into pits.
Question (8): Is there any requirement to provide a drain or sump in any pit?

Reply (8): No, the Standard does not address drain or sump.

**Interpretation: 06-05**

Subject: Paragraphs 2.3.1.1, 2.3.1.3, and 2.10.10

Edition: ASME A18.1-2003,

Date of Issued: February 14, 2007

Question (1): Are gearboxes subject to the factor of safety specified in 2.3.1.1?

Reply (1): Yes.

Question (2): Rule 2.3.1.3 states that friction gearing, clutch mechanisms, or couplings shall not be used to connect a driving machine drum or sheave to the main driving mechanism. Are couplings or clutches allowed when a brake is provided within a gearbox attached to a drum?

Reply (2): No.

Question (3): Must the manual operation function to both raise and lower a lift?

Reply (3): No.

**Interpretation: 06-06**

Subject: Paragraph 10.1.1

Edition: ASME A18.1-2003,

Date of Issued: February 14, 2007

Question (1): Is it the intent that the “inspector employed by the authority having jurisdiction,” the “inspector employed by an accredited insurance company,” or the individual “authorized by the authority having jurisdiction” be required to meet a minimum level of competency for qualification prior to performing inspections and witnessing tests?

Reply (1): There is no minimum level of competency required in the A18 Standard.

Question (2): If the answer is yes, is it the intent that the minimum level of competency be the ASME QEI Standard?

Reply (2): See the answer to number (1).
Interpretation: 07-01
Edition: A18.1-1999 up to and including A18.1-2005
Subject: Paragraph 2.1.1.4
Date of Issued: July 23, 2007

Question: Paragraph 2.1.1.4 requires that all doors shall be provided with a combination mechanical lock and electric contact. Do either the standard or definition prohibit the combination mechanical lock and electric contact from being unlocked electrically?

Reply: No.

Interpretation 08-01
Edition: ASME A18.1 – 2003 (and later editions)
Subject: Section 2.3
Date of Issued: July 15, 2008

Question: Does this section allow a "Chain Hydraulic" driving means?

Reply: Yes.

Interpretation 10-1671
Subject: Sections 2.9.1 and 2.9.2 Terminal Stopping Devices
Date of Issued: October 11, 2010

Question: Can a physical stop be used to satisfy the requirement for a normal terminal stopping device at the lower landing?

Reply: No.

Interpretation 11-1924
Subject: Paragraph 8.2 Screw Column
Date of Issued: December 7, 2011
Question: Does a screw column used in a screw machine that meets all the requirements of 8.2 need to be vertically oriented?

Reply: No.

Interpretation 12-59


Subject: Paragraph 2.10.10 Manual Operations and 2.12 Standby Power

Date of Issued: February 1, 2012

Question (1): Is manual operation complying with 2.10.10 permitted to operate in one direction only?

Reply (1): Yes.

Question (2): Is manual operation complying with 2.10.10 permitted to operate in both directions?

Reply (2): Yes.

Question (3): Is the manual operation complying with 2.10.10 required to work with full rated capacity?

Reply (3): Yes.

Question (4): Is the manual operation complying with 2.10.10 required to be able to move the platform to a landing?

Reply (4): The standard does not address a distance.

Question (5): If the answer to Item 1 is yes, is the manual operation complying with 2.10.10 required to move the platform in the direction of egress?

Reply (5): No.

Question (6): If the hydraulic platform lift serves 3 levels, the mid landing is the main egress level, and the manual operation consists of bleeding the hydraulic system to lower the unit, does this comply with 2.10.10?

Reply (6): Yes, see Item 5 also.

Question (7): Does 2.12 require standby power on all vertical platform lifts?

Reply (7): No.

Question (8a): Is a vertical platform lift permitted to have battery power that is not capable of meeting the requirements in 2.12?
Reply (8a): Yes, but manual operation complying with 2.10.10 is required when the battery is not sufficient to provide standby power in accordance with 2.12.

Question (8b): If a hydraulic platform lift, utilizes bleeding of the hydraulic system to lower the unit one time only in the event of power failure, does it comply with 2.10.10?
Reply (8b): Yes.

Question (8c): If a hydraulic platform lift, utilizes bleeding of the hydraulic system to lower the unit one time only in the event of power failure, does it comply with 2.12?
Reply (8c): No.

Interpretation 12-2044
Subject: Section 2.1.7.2 Electrical Equipment and Wiring
Date of Issued: January 25, 2013

Question: Does a 24 VDC battery powered vertical lift have to be certified to meet the electrical requirements of ASME A17.5? (Note: A17.5, 1 scope. 1.4)
Reply: Yes.

Interpretation 13-1494
Subject: Section 2.5.1.4 Wire Rope Diameter
Date of Issued: October 30, 2013

Question (1): Does the “rated load” in para. 2.5.1.4 refer to the rated load for the entire lift?
Reply (1): Yes.

Question (2): Does the “rated load” in para. 2.5.1.4 refer to the rated load for a particular rope?
Reply (2): No.

Interpretation 14-1920
Subject: Section 8.1.4.10 Flow Control Device

Date of Issued: October 13, 2014

Question (1): Is the flow control device specified in paragraph 8.1.4.10 required to be a valve?

Reply (1): No. The Standard does not specify the design.

Question (2): Can it be an orifice or other hydraulic fitting that limits the volume of fluid exiting the cylinder?

Reply (2): Yes, provided it meets the requirements of 8.1.4.10.

Question (3): Does the A18.1-2011 Standard have a specific requirement for the flow control device specified by paragraph 8.1.4.10 to be field tested?

Reply (3): No.