

**Comments and secretariat observations on "Safety rules for the construction and installation of lifts — Lifts for the transport of persons and goods — Part 20: Passenger and goods passenger lifts "**

Date: 2nd of April 2012	Document:  Draft prEN 81-20:2011
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1 ES	General		ge	<p>Eliminate the restriction to steel ropes <math>\geq 8</math> mm.</p> <p>The today's requirements in this draft are not anymore reflecting the state of the art. Many lift installers are using steel ropes with a diameter smaller than 8 mm, synthetic ropes or other means as e.g. belts.</p> <p>Further, CEN/TC10 has several times communicated, the EN81 family of Standards has a strong acceptance worldwide lift safety Standard.</p> <p>Not covering the state of the art technology may lead to:</p> <ul style="list-style-type: none"> <li>the majority of lifts installed in the EC will deviate from EN81-20,</li> <li>not accepting or adopting EN81-20 outside Europe (de-harmonization).</li> </ul>	<p>Include alternative solutions for steel ropes with a diameter smaller than 8 mm, synthetic ropes or other means as e.g. belts.</p> <p>This could be subject of an Amendment on EN81-20.</p>	
2 ES	General		ge	-	Eliminate all references to any national regulations in this Standard (e.g. 5.2.1.8.1)	
3 ES	General		ge	-	Where a clause is specifically only referring to hydraulic lifts the words "hydraulic lifts" should appear somewhere in the text of the clause	

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4 ES	General		ed	Actually numbering of clauses with all requirements in clause 5 more difficult as the old EN81-1/2.	Keep clause numbering on the basis of the EN81-1/2.	
5 ES	General		ge	The definition of ‘Type examination’ and ‘Certification’ is something which corresponds to the Directive. Introducing it here creates confusion and lead to missinterpretations.	The term “Type examination” shall be changed to “Product certification”	
6 ES	Content		ed	0.2 is missing	Add title “0.2 Principles”	
7 ES	Content		ed	It is difficult to follow figures and tables position	Add a list of figures and tables referenced to pages where they appear	
8 ES	Foreword		ed		Include: alignment with CEN Guide 414 lay out	
9 ES	0.1.1	Footnote	ed	According to the text in the Foreword the existing interpretations are incorporated in this version. Within CEN/TC 10 an interpretation committee has been established to answer questions about the spirit in which the experts have drafted the various clauses of this standard. The issued interpretations are available in CEN TS 81-11.	Proposal for modification:  ..... <del>The New</del> issued interpretations <del>are</del> <u>will be made</u> available in CEN TS 81-11.	

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10 ES	0.1.1		ed	Term User is restrictive	The object of this standard is to define safety rules related to passenger- and goods/passenger-lifts with a view to safeguarding persons and objects against the risk of accidents associated with the <del>user</del> normal use, maintenance- and emergency operation of lift	
11 ES	0.1.2.1			<ol style="list-style-type: none"> <li>1) Using "e.g." can lead to the fact that they are just examples.</li> <li>2) "Authorised" is more proper than "competent"</li> <li>3) Note. Clause is related to PERSONS (not lift issue)</li> </ol>	Persons to be safeguarded: a) Users; b) <del>Competent and</del> authorised persons, e.g. <del>maintenance and inspection</del> personnel (see EN 13015); c) Persons outside the lift well, the machine room and pulley room (if any). NOTE EN 81-71 gives additional requirements covering lifts resisting to act of vandalism.	

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12 ES	0.1.2.1 b)		ed	Reference to EN13015 is missing	Refer to a specific part of EN 13015	
13 ES	0.2.4		ed	Risk analysis, terminology and technical solutions have been considered taking into account the methods of the EN 61508 series of standards. This led to a necessary classification of safety functions applied to programmable electronic system in safety related applications for lifts (PESSRAL).	Risk analysis, terminology and technical solutions have been considered taking into account the methods of <a href="#">the EN ISO 1200, ISO 14798</a> and the EN 61508 series of standards. <del>This</del> EN 61508 led to a necessary classification of safety functions applied to programmable electronic system in safety related applications for lifts (PESSRAL).	
14 ES	0.3	0.3.21 0.3.22	te	The information included in section “0.3 Assumptions” is related to basic considerations and hypothesis in relation with use, working and failure conditions, etc; such assumptions have been used for the evaluation of the risks and definition of proposed safety requirements and protective measures.  Specific technical requirements should therefore not be included in this section but in the appropriate sub-clauses in section 5. Several sub-clauses in this section refer specific technical requirements and should thus be transferred to the appropriate sub-clauses in section 5.	1 <sup>st</sup> Removal of sub-clause 0.3.21 related to guards. The content of the sub-clause should be transferred to the applicable sub-clauses in the standard, for example but not limited to:  · “5.3 Landing doors and car doors” · “5.5 Suspension means, compensation means and related protection means” · “5.9 Lift machinery and associated equipment,”  and 2 <sup>nd</sup> Removal of sub-clause 0.3.22 related to the properties of the hydraulic fluids for hydraulic lifts. The content of the sub-clause should be	

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					transferred to the applicable sub-clause: "5.9.3 Lift machinery for hydraulic lifts".	
15 ES	0.3.1			To add information about seismic category and well ventilation needs	Negotiations have been made between the customer and the supplier about:  .. d) Civil engineering problems; e) <u>The building designer or the lift owner shall provide the design acceleration <math>a_d</math>.</u> f) <u>heat dissipation coming from lift component/equipment and need for well ventilation</u>	
16 ES	0.3.2	Clause 2	ed	Add harmful material in listing	e) Free of harmful materials (e.g. asbestos)	
17 ES	0.3.12		ed	Unclear definition "free fall from the lowest landing" does it mean that the car is stationary at landing when free fall occurs or can the car be in deceleration when this happens	Add: ... free fall from the lowest landing starting with the car stationary at the landing, before the car ...	
18 ES	0.3.14		ed	Not longer valid seen EN 81-28	Delete clause: <del>0.3.14 The organisation within the building, where the lift is installed, is such that it can respond effectively to emergency calls without</del>	

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					<del>undue delay (see 0.3.1).</del>	
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19 ES	0.3.17		ed	Any reference in a harmonized standard to eventual national legislation is creating soon or later problems on the local (market)	Delete the words : “ <del>according to national legislation</del> ”	
20 ES	0.3.19		ed	Any reference in a harmonized standard to eventual national legislation is creating soon or later problems on the local (market)	Delete the words “ <del>by building regulation</del> ” Replace by: “ <u>by code of good practice</u> ,	
21 ES	0.3.22		ed	The designation of the standard is wrong.	Use the correct designation of the standard. Where it reads: “ ... <i>according to ISO 6743-4</i> ” it should read: “ ... <i>according to EN ISO 6743-4</i> ”	
22 ES	0.3.23		te	Following text is not an assumption but rather a requirement: “In the case of lifts provided with a restrictor/one-way restrictor as precaution against descent with excessive speed an impact speed of the car on the buffer (s) or the pawl device equal to rated speed downwards $v_d + 0,3$ m/s should be taken into account.”	To include in the correct chapter of requirements	

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23 ES	0.3.5		te	This assumption conflicts with the permit to operate a car with up to 110 % of rated load.	Make clear definition: By design of the load bearing elements, a safe normal operation of the lift is assured for loads ranging from 0 % to <u>the maximum allowed duty load</u> (100 % of the rated load <u>plus overload</u> – see § 5.12.1.2.	
24 ES	0.3.6		ed	The safety contact according 5.11.2.1.1 a) is also considered as an electrical safety device therefore the reference should include a) too.	(see 5.11.2.1.1 a) & b))	
25 ES	0.3.6			It is assumed then that any failure of any safety component which has been type tested can't be taken into consideration	...of an electric safety device (see 5.11.2.1.1 b) complying with all the requirements of the standard or type tested need not to be taken into consideration	

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26 ES		Tables 1, 2, 3, 4, 5, 6, 7 and 13	ed	The numbering of some of the tables is wrong.	Renumber the tables with the wrong numbering. Where it reads → It should read <i>Table 1</i> → <i>Table 2</i> <i>Table 2</i> → <i>Table 3</i> <i>Table 3</i> → <i>Table 5</i> <i>Table 4</i> → <i>Table 6</i> <i>Table 5</i> → <i>Table 7</i> <i>Table 6</i> → <i>Table 8</i> <i>Table 8</i> → <i>Table 11</i> <i>Table 7</i> → <i>Table 10</i> <i>Table 13</i> → <i>Table 16</i>	
27 ES	1.2		te	For clarity, include this point in 1.3 g)	1.3 a) ... b)... .... g) Additional requirements necessary for the use of lifts in case of fire and special cases (potentially explosive atmosphere, extreme climate conditions, seismic conditions, transporting dangerous goods, etc.	

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28 ES	1.3		ed	Subclause e) from previous version must be kept ("inclined" lifts are not addressed)	This standard does not cover: a) Lifts with: 1) Drives <u>principles</u> other than those stated in <b>1.1</b> ;	
29 ES	1.3 d)		te		Include also "wind turbines"	
30 ES	2			To add	EN 81-77 EN ISO 12100	
31 ES	3.2		ed	Definition of authorized person; use the same definition as in EN 81-80, 3.1	<b>3.2 authorized person</b> ( <i>personne autorisée</i> ) ( <i>befugte Person</i> ) <del>competent person with the permission of the owner of the lift to access restricted areas</del> ( <del>machinery and pulley spaces, lift well, pit and car roof</del> )  <u>Person with a permission from the owner of the installation to perform defined activities</u>	
32	3.3	3.39	ge	The word "retardation" is used.	We propose to use the word "deceleration"	

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ES					because it is more adequate for motion.	
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33 ES	3.5		ed	<p>What is the difference between brake and brake set? Does it add benefit to define a term when it is used only once?</p> <p>In 5.9.2.2 either the term braking system or brake is being used.</p> <p>The French and German translations of the term seem to have a different meaning.</p>	<p>Define consistent and coherent terms.</p> <p>Use «braking element» (as the French term) for that part of the braking system that need to be redundant.</p> <p>This results in a structure:</p> <p>Braking system (machine brake) comprises</p> <ul style="list-style-type: none"> <li>- at least two braking elements</li> <li>- at least on brake opening mechanism (e.g. solenoid or hydraulic pump)</li> <li>- at least one braking drum or sheave</li> </ul>	
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34 ES	3.8	Competent person	te	<p>The definition of a competent person includes “a designated person ... provided with necessary instructions to ... rescuing users from a stalled car”</p> <p>This person is permitted within the body of the standard to:</p> <ol style="list-style-type: none"> <li>return the lift to service after application of the safety gear</li> <li>return the lift to service after application of the pawl device</li> <li>return the lift to service after application of the ascending car overspeed device</li> <li>return the lift to service after application of the unintended movement device</li> <li>etc.</li> </ol> <p>It does not seem wise to allow this to be done by someone only competent to rescue passengers.</p> <p>Also 0.1.2.1 b) infers that competent and authorized persons only include maintenance and inspection personnel</p>	<p>Revise the definitions for competent person as follows:</p> <p>competent person (personne compétente) (sachkundige Person)</p> <p>a designated person, suitably trained, qualified by knowledge and practical experience, provided with necessary instructions to safely carry out the required operations for inspecting or maintaining the lift or <del>rescuing users from a stalled car</del></p> <p>Include a new definition for emergency personnel as follows:</p> <p>Emergency personnel</p> <p>a designated person, suitably trained, qualified by knowledge and practical experience, provided with necessary instructions to safely rescue users from a stalled car</p> <p>Revise body of the standard as necessary to reflect the use of the new definition.</p>	
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35 ES	3.28		ed	<b>machinery</b> ( <i>machinerie</i> ) ( <i>Triebwerk und Steuerung</i> )  equipment traditionally placed in the machine room: control cabinet(s) and drive system, lift machine, main switch(es), and means for emergency operations	<b>machinery</b> ( <i>machinerie</i> ) ( <i>Triebwerk und Steuerung</i> )  equipment <del>traditionally placed in the machine room</del> : control cabinet(s) and drive system, lift machine, main switch(es), and means for emergency operations	
36 ES	3.45		ed	Introduces a new term, ‘person’ additional to passenger (3.34) and user (3.62).	Replace the word persons by “ users “ according to 3.62	
37 ES	3.45			Not all the events causing entrapments are necessarily a "malfunction"	<b>rescue operations</b> ( <i>opérations de secours</i> ) ( <i>Notbefreiung</i> )  specific actions required to safely release persons entrapped in the lift car and well <del>due to a malfunction</del>	
38 ES	3.45		te	A failure of the main power supply shall not be considered a malfunction of the lift.	Rescue operations. Specific actions required to safely release persons entrapped in the lift car <del>and well due to a malfunction.</del>	

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39 ES	3.50		te	EN 61508 series already defined SIL. It would be appropriate to pick this definition to prevent confusion. And since SIL defines a safety integrity level of a safety function, it can not be allocated to a device. Only the function or a part of the function can be allocated to a device. This results in reliability requirements for the respective device to enable it to satisfy the related requirement of the safety function.	Use SIL definition of EN 61508 series.	
40 ES	3.61		ed	The definition of unlocking zone uses the undefined term “stopping level”. In practice the unlocking zone is relative to the landing. This is the same language used in the definition of levelling accuracy and unintended movement. Also “car floor” should be “car door”.	Revise as follows: unlocking zone (zone de déverrouillage) (Entriegelungszone) a zone, extending above and below the <del>stopping level</del> <u>landing level</u> , in which the car floor has to be to enable the corresponding landing door to be unlocked	
41 ES	3.xx	new	ed	Definition of the owner of the lift is missing; use the same definition as in EN 81-80, 3.5	3.5 Owner of the installation  Natural or legal person who has the power of disposal of the installation and takes the responsibility for its operation and use	

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42 ES	4	Table 1	te	<p>The formulation in the last sentence , is in contradiction with the use of the word “ not relevant” in table 1 “ and furthermore in particular the example sharp edges which you can find in table 1 as “not addressed see 5.1.1”</p> <p>Some cells are empty.</p>	<p>To improve wording</p> <p>Solve the problem of understanding between “not relevant” and “not addressed”</p> <p>E.g; table 1 point 5 (vibrations) versus 1.3 last sentence which says « not relevant and the table says not addressed?</p> <p>Fill all cells; Either by adding relevant clauses of this standards or if no clause in the Standard it has to be treaded case by case by Risk assessment.</p>	
43 ES	5.2.1.1.1		te	<p>As written, equipment is not permitted in a machine room, only in a machinery space or a pulley room.</p>	<p>Revise as follows:</p> <p>3.26 machine room (local de machines) (Triebwerksraum) <del>a room</del> <u>an enclosed machinery space outside the hoistway</u> in which machine or machines and/or the associated equipment are placed</p> <p>Revise the rest of EN 81-20 to properly reflect the revised definition as necessary.</p>	
44	5.2.1.2		te	<p>Equipment permitted in machinery spaces needs to be addressed.</p>	<p>Revise 5.2.1.2 in part as follows:</p> <p>Exclusive use of the lift well, <u>machinery spaces,</u></p>	

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Date: 2nd of April 2012	Document:  Draft prEN 81-20:2011
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ES					machine and pulley room	
45 ES	5.2.1.2				Exclusive use of the lift well, <u>machinery spaces</u> , machine and pulley room	
46 ES	5.2.1.2.1		te	Clarify the situation regarding: mobile phone antennas, smoke flaps/shatters, etc.	Equipment related to an elevator shall be allowed, e.g. mobile phone antennas, smoke flaps/shatters, etc.	
47 ES	5.2.1.2.1				The lift well, <u>machinery spaces</u> , machine and pulley rooms shall not be	
48 ES	5.2.1.2		ed	The order of the contents in the sub-clause seems unclear. Indications related to the well are included under sub-clause 5.2.1.2.2, which is dedicated to contents of machine rooms. The sub sections in could be avoided and all requirements be included under a single sub-clause.	The following rephrasing is proposed for the sub-clause: <b>"5.2.1.2 Exclusive use of the lift well, machine and pulley room</b> <i>The lift well, machine and pulley rooms shall not be used for purposes other than lifts. They shall not contain ducts, cables or devices other than for the lift.</i> <i>These spaces may, however, contain:</i> a) <i>Equipment for air-conditioning or heating of these rooms or well, excluding steam heating and high pressure water heating; however, any control and</i>	

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					<p><i>adjustment devices of the heating apparatus shall be located outside the well.</i></p> <p><i>b) Machine and pulley rooms may contain fire detector or extinguishers, with a high operating temperature, appropriate for the electrical equipment, stable over a period of time and suitable protected against accidental impact.</i></p> <p><i>c) Machine rooms may contain machines for other kinds of lifts.</i></p> <p><i>In the case of lift wells according to 5.2.5.2.2 it is regarded as "well" in the case where enclosures are:</i></p> <p><i>a) Present: in the area inside the enclosure;</i></p> <p><i>b) Missing: the area being inside a horizontal distance of 1,50 m from movable components of the lift (see 5.2.5.2.2)."</i></p>	
49 ES	5.2.1.3				<p><b><u>Ventilation of the well, pulley, machinery spaces and machine rooms</u></b></p> <p>The well, <u>pulley, machinery spaces</u> and machine rooms shall not be used to provide ventilation of</p>	

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					rooms other than those belonging to the lift.	
50 ES	5.2.1.3			If the machine room are introduced – pulley rooms should be	<b>Ventilation of the well, <u>pulley</u> and-machine rooms</b> The well, <u>pulley</u> and machine rooms shall not be used to provide ventilation of rooms other than those belonging to the lift.	
51 ES	5.2.1.3		te	Ventilation of machinery spaces needs to be addressed.	Revise 5.2.1.3 in part as follows: Ventilation of the well, <del>and</del> machine rooms <u>and machinery spaces</u>	
52 ES	5.2.1.4		te	Lighting of machine rooms needs to be addressed.	Revise 5.2.1.4.3 as follows: 5.2.1.4.3 <del>The Machine and</del> pulley room shall be provided with permanently installed electric lighting with an intensity of at least 100 lux at floor level everywhere a person needs to work or needs to move between working areas. The supply for this lighting shall be in conformity with 5.10.7.1.	
53 ES	5.2.1.4.1		te	Additional lamps on the car roof for well lighting require definitions how to separate this supply on the car roof from the car light supply and the lift supply in order to guarantee safe working on the equipment. There must be sufficient lighting even in case the car roof needs to be made free	Add a requirement in 5.10.7.1 and 5.10.8.2	

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				of voltage completely.		
54 ES	5.2.1.4.1			More precise definition	To achieve this, sufficient number of lamps shall be fixed throughout the well and where necessary additional lamp(s), may be fixed on the car roof as a part of the well lighting system. All lamps and their circuits must be protected against mechanical damage . Power supply shall be fused and grounded, and independent to other electrical lines. Lighting provided by additional lamps on the car shall not provide more than XX% of the required well lighting. The well lighting cannot be used for machinery spaces lighting	
55 ES	5.2.1.4.1		te	There is no indication in the sub-clause to the requirement of the supply to this lighting to be independent of the supply to the machine, as for example is included in sub-clause 5.2.1.4.2 and in 5.2.1.4.3.	Add the following sentence at the end of sub-clause 5.2.1.4.1: <i>"The supply for this lighting shall be in conformity with 5.10.7.1"</i> Alternatively a new sub-clause could be included with this requirement for all applicable lightings: <b>"5.2.1.4.4 Supply for the lightings required by 5.2.1.4.1, 5.2.1.4.2 and 5.2.1.4.3 shall be in</b>	

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					<i>conformity with 5.10.7.1".</i>	
56 ES	5.2.1.4.2				The working areas at machinery spaces <u>and in the machine room</u> shall be provided with permanently installed electric lighting with an intensity of at least 200 lux at floor level everywhere a person needs to work <u>and at least 50 lux where a person needs</u> to move between working areas. The supply for this lighting shall be in conformity with <b>5.10.7.1</b> .	
57 ES	5.2.1.4.2 5.2.1.4.3		te	Conflict in lux amount between two paragraphs as they both refer to working places	Require 200 lux in both clauses	
58 ES	5.2.1.5				<b>Electric equipment in the pit and in machinery spaces and <u>machine or pulley rooms</u></b>	
59 ES	5.2.1.5.1			There should be also an alarm device as indicated in 5.2.1.6, located close to the lower stopping device.	To add: e) an alarm device shall be located close to the lower stopping device (see 5.2.1.6)	

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60 ES	5.2.1.5.1	a)	te	<p>Location of stopping devices should be defined more precisely to ensure they are easy reachable from both the landing and the pit well.</p> <p>It has to be also taken into consideration the pit depth, as it may be necessary more than one stopping device in the same access.</p>	<p>The location of the stopping device(s) shall be as follows :</p> <p>Upper stopping device:</p> <ul style="list-style-type: none"> <li>- Maximum vertical distance: no lower than 0.40 m above lowest landing floor (up to 1.60 m pit depth) or no lower than 1.00 m above the lowest landing floor (more than 1.60 m, applicable for the upper).</li> <li>- reaching distance must be within 0.75 m (radius) from the further edge of the door frame (relevant opening side)</li> </ul> <p>Lower one (and additional to the upper one, applicable for pits deeper than 1.6 m):</p> <ul style="list-style-type: none"> <li>- maximal vertical distance above pit floor of 1.20 m</li> <li>- fixed below the upper one</li> </ul> <p>To ensure that any stopping device is easily reachable from both the landing and the pit well,</p>	
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					more than one could be needed. If that is the case, they all shall be wired in series.	
61 ES	5.2.1.5.1	b)		In some cases, an inspection control box may not be needed as design of the lift is such that it is not required to operate the car from the pit. In any case, it seems sufficient if one inspection panel per elevator would be available. Therefore, only the possibility to connect the inspection panel needs to be requested.	To add: An inspection control box may not be needed as design of the lift is such that it is not required to operate the car from the pit. In any other cases, <u>a connection point for an inspection control station according to 5.12.1.5</u> accessible from the standing area shall be made available.	
62 ES	5.2.1.5.2	a)	Ed	One working area could have more than one possible access point	"Switch(es) accessible only to authorised persons and placed close to each access point to working area(s), at an appropriate height, shall control the lighting of the areas and spaces."	
63 ES	5.2.1.5.2			For consistency	There shall be in machinery spaces and <u>machine or pulley</u> rooms:	
64 ES	5.2.1.5.2.c)				A stopping device, in conformity with <b>5.12.1.11</b> , shall be installed in the <u>machinery spaces, machine or pulley</u> room, close to the point(s) of access. On or near the stopping device there shall be the marking <b>“STOP”</b>	

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65 ES	5.2.1.6				Emergency release If no means to escape are provided for person trapped in the well, additional alarm initiation devices to the alarm system according to EN 81-28 shall be installed at places where the risk of trapping exists (see 5.2.1.5.1 / 5.4.8)	
66 ES	5.2.1.7			This aspect is valid also for machine and pulley room	One or more metal supports or hooks with the indication of the safe working load, as appropriate, are provided in the machinery spaces, <u>machine and pulley room</u> conveniently positioned to permit the hoisting of heavy equipment (see <b>0.3.1</b> and <b>0.3.15</b> ).	
67 ES	5.2.1.7		ed		Replace “metal support or hooks” by “suspension points”	
68 ES	5.2.1.8	title	ed	Ceiling as indicated in the tile is not referred in this chapter	Adjust title accordingly or add missing requirement for the ceiling	

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69 ES	5.2.1.8.1		te	The structure of machine rooms needs to be addressed.	Revise 5.2.1.8.1 as follows: 5.2.1.8.1 The structure of the lift well, machinery spaces and <u>machine and pulley</u> rooms shall conform to National Building Regulations and be able to support at least the loads which may be applied by the machine, by the guide rails at the moment of safety gear operation, in the case of eccentric load in the car, by the action of the buffers, by those which may be applied by the anti-rebound device, by loading and unloading the car, etc..	
70 ES	5.2.1.8.1			Mentioning eccentric may be unnecessary	The structure of the lift well, machinery spaces and pulley rooms shall conform to National Building Regulations and be able to support at least the loads which may be applied by the machine, by the guide rails at the moment of safety gear operation, <del>in the case of eccentric load in the car,</del> by the action of the buffers, by those which may be applied by the anti-rebound device, by loading and unloading the car, etc	
71 ES	5.2.1.8.3		te	They shall withstand 1000 N horizontal static force on an area of 0,30 m x 0,30 m at any point without permanent deformation.	Proposal: They shall withstand 1000 N horizontal static force on an area of 0,30 m x 0,30 m at any point	

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					<del>without permanent deformation.</del>	
72 ES	5.2.1.8.4			Extend requirements to cope with cases with machine installed on top of the rails (machine room less)	The floor of the pit shall be able to support beneath each guide rail except hanging guide rails the force in newtons, due to the mass in kilograms of the guide rails <u>plus any load due to components fixed or linked to the guide(s) and / or any additional reaction (N) occurring during emergency stopping (eg load on traction sheave due to rebound when machine on rails..)</u> the reaction in newtons at the moment of operation of the safety gear and any push through force exerted by the guide rails clips (see <b>5.7.2.3.5</b> ).	
73 ES	5.2.1.8.5			Interpretation 517	The floor of the pit shall be able to support beneath the car buffer supports 4 times the static load being imposed by the mass of the fully loaded car <u>and distributed among all car buffers</u>	
74 ES	5.2.1.8.6			Interpretation 517	The floor of the pit shall be able to support beneath the counterweight buffer supports, 4 times the static load being imposed by the mass of the counterweight <u>and distributed among all car buffers</u>	
75 ES	5.2.1.8.6		te	Balancing weight is missed.	The floor of the pit shall be able to support beneath the counterweight buffer supports, 4 times the static load being imposed by the mass of the counterweight <b>or balancing weight.</b>	

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76 ES	5.2.1.9	3 <sup>rd</sup> sentence	ed	Pit floor shall be smooth	Delete the word “smooth”: making a concrete floor smooth is applying special technics	
77 ES	5.2.1.9	Note	ed	NOTE For guidance see EN ISO 14122-2, clause 4.2.4.6, missing date	a reference to a clause in a standard needs a dated standard reference	
78 ES	5.2.1.9	Second last sentence and last sentence	ed	Second last sentence and last sentence are overlapping for what concerns “pit shall be impervious, infiltration (outside in ) and leakage inside out”  Seems this clause regards well, pit and machinery and pulley rooms last § refers to machinery space only if hydro unit ?	Improve sentence  The building in of guide ... shall not render impervious the pit;  All fluids contained into the well and or machinery spaces (e.g. also in the hydro cylinder and piping” shall be retained if it leaks out or escapes;	
79 ES	5.2.2		ed	No reference to Annex D is made in this chapter	Add reference to Annex D	
80 ES	5.2.2.1		te	Access should be to authorized persons and emergency personnel (see previous commentary on definitions of competent person).	5.2.2.1 The lift well, machinery spaces and pulley rooms and the associated working areas shall be accessible. Provisions shall be made to allow access to spaces other than the lift car only to authorised persons (maintenance,	

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				See comment 45.	<del>inspection and rescue</del> <u>and emergency personnel.</u>	
81 ES	5.2.2.1				The lift well, machinery spaces and <u>machine or</u> pulley rooms and the associated working areas shall be accessible. Provisions shall be made to allow access to <u>these</u> spaces other than the lift car only to authorised persons ( <del>maintenance, inspection and rescue</del> ).	
82 ES	5.2.2.2				The access way adjacent to any door/trap giving access to the lift well or to machinery spaces and <u>machine</u> / pulley rooms shall be:	
83 ES	5.2.2.2	b)	Te	Parties should be advised about liabilities derived from the needed to access to the machinery spaces and/or the well through private premises	Add a note : "Note : The manufacturer should make all parties aware of the need to service the lift and carry out rescue operations without the need of entering private premises, and also problems of security associated with lifts serving directly into private premises (see <b>0.3.1</b> Negotiations)"	
84 ES	5.2.2.3	Last paragraph	Te		"If the ladder is stored on the pit floor, all pit safety spaces shall be maintained when the <del>devices</del> <u>ladder</u> is in use or in its stored position."	

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85 ES	5.2.2.4		ed	Why not here refer to annex for at least use the same wording-requirements? -Ladder rungs versus ladder width - Space between rungs ?	To improve and add reference to Annex F	
86 ES	5.2.2.4		te		This standard shall deal with requirements for arrangement of ladders, for requirements of the ladder itself Standards for ladder shall be referenced	
87 ES	5.2.3		ed		Access and emergency doors, access trap doors and inspection traps to machinery spaces and pulley rooms.	
88 ES	5.2.3.1			Requirements are missing		
89 ES	5.2.3.4			Should be aligned with requirements for access to work places	Access and emergency doors, access trap doors and inspection traps shall have the following dimensions: a) Access doors to pulley rooms and access doors to the well shall have a <u>minimum height of 1,40 m</u> and a minimum width of 0,60 m;	
90 ES	5.2.3.4	b)	Te	Previously the access door to working areas inside the well was 1,8 m high.	Change to ; "Access doors shall have a minimum height of ;	

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					- 1.4m for pulley rooms - 1.8m for the well"	
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**Comments and secretariat observations on “Safety rules for the construction and installation of lifts — Lifts for the transport of persons and goods — Part 20: Passenger and goods passenger lifts ”**

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91 ES	5.2.3.5 c)		ed	Be capable of being opened from inside the well without a key, even when locked	Delete the words: “the well “ as those requirement are also valid for access to the machine and pulley rooms ( see d )	
92 ES	5.2.3.5.d)				Access and emergency doors, <u>access trap doors</u> and inspection traps shall: d) Be provided with an electrical safety device in conformity with <b>5.11.2</b> , checking the closed position; An electric safety device is not required in case of access door(s) to machine <u>room</u> (§ xxx) <del>and</del> -pulley rooms ( <u>§xx</u> ) <u>Machinery spaces</u> and <del>to</del> the pit ( <b>5.2.2.3</b> )	

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93 ES	5.2.5.4.b)		te	Adequate calculations and impact points design would allow to design the impact support under the pier other than the foundation of the building.	<p>There shall be installed below the counterweight buffer or under the travelling area of the balancing weight:</p> <ol style="list-style-type: none"> <li>1) a pier extending down to the foundation of the building, <b>or</b></li> <li>2) <b>adequate impact point(s)</b>, designed to support the impact from the free falling of the counterweight or balancing weight.</li> </ol> <p>The maximum kinetic energy from the free falling counterweight or balancing weight to the <b>pier or impact points</b> shall be communicated to the building designers.</p>	
94 ES	5.2.5.2.1	e)	te		Change in e) machine room by <b>machinery spaces</b>	

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95 ES	5.2.5.2.2 a) 2)	Figure 2	te	<p>Partially enclosed well:</p> <p>Where the well .....</p> <p>The height is assumed to be sufficient if it is in conformity with figure 1 and 2, that means:</p> <p>1) minimum 3,50 m at a landing door side;</p> <p>2) minimum 2,50 m at other sides and with a minimum horizontal distance of 0,50 m to moving parts of the lift.</p> <p>If the distance to moving parts exceeds 0,50 m, the value of 2,50 m can be reduced progressively to a minimum height of 1,10 m in a distance of 2,0 m;</p> <p>b) ...</p>	<p><u>2) minimum 3,50 m at other sides and with a minimum horizontal distance <math>\geq</math> 0,05 m to moving parts of the lift.</u></p> <p><u>If the distance to moving parts exceeds 0,05 m, the value of 3,50 m can be reduced progressively to a minimum height of 2,5 m in a distance of 0,5 m; or the value of 2,50 m can be reduced progressively to a minimum height of 1,1 m in a distance of 2,0 m. (see Figure 1 and Figure 2)</u></p> <p>b) ...</p>	
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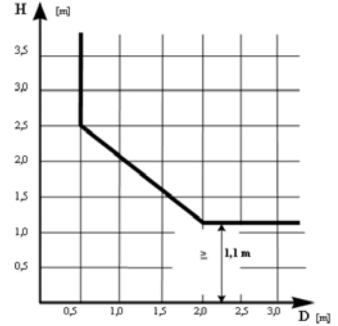
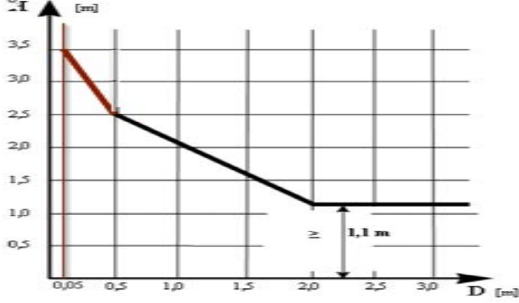
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				 <p>Figure 2 - Partially enclosed well - Distances</p> <p>Our concern:</p> <p>The minimum height H for the enclosure is 3,5 m at a landing door side (see 5.2.5.2.2 a) 1)); which is considered as safe.</p> <p>We are of the opinion that the height of the enclosure at other sides (see 5.2.5.2.2 a) 2)) by a <math>D \leq 0.5</math> is unnecessarily stronger.</p> <p>Examples based on existing clause:            For <math>D = 0.51</math> m; <math>H_{\min} = 2.49</math> m            For <math>D = 0.50</math> m; <math>H_{\min} = 2.5</math> m            For <math>D = 0.49</math> m; <math>H_{\min} \rightarrow</math> full height !!!</p>	 <p>Figure 2 - Partially enclosed well - Distances</p> <p><a href="#">Figure 2 modified</a></p>	
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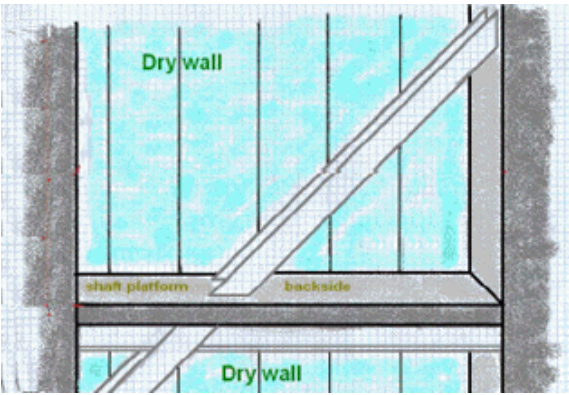
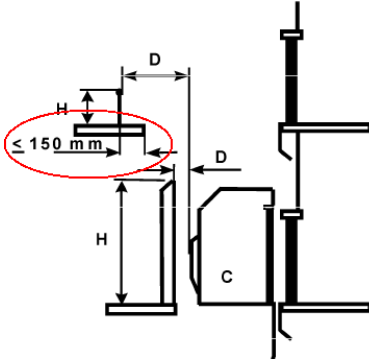
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96 SP	5.2.5.2.x (New)		te	<p>Many high rise building are designed as steel construction with the result that some steel beams may be placed within the lift well. Also often the floor slab is projecting into the well. Such beams/projection could be misused as a standing area for persons in the well which could lead to dangerous situation. See illustration.</p> <p>This draft is not covering this risk. We are of the opinion that this is not acceptable.</p> 	<p>Proposal:</p> <p>Any horizontal projection from a wall into the well m or horizontal beam <math>\leq 0.15</math> m which could be used as a standig area shall be chamfered at least 45° to the horizontal or prevent access to this area by applying a screen with a height of 2.0 m above the horizontal area to be protected.</p> <p>(Explanation: The value of <math>\leq 0.15</math> m is taken from Figure 1 — Partially enclosed well)</p> 	
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97 ES	5.2.5.3.1	Figure 3	ed	Distance between toe guards should be 35mm and not 0,35mm.	Replace 0,35mm by 35mm	
98 ES	5.2.5.3.2		ed	"The following requirements are illustrated in Figure 3." Shall be moved to the right place.	To include this sentence under 5.2.5.3.2 and not under 5.2.5.3.1	
99 ES	5.2.5.3.2 c)		ed	Wrong reference to operation with doors open	replace reference 5.3.11.2 by 5.3.8.2.2	
100 ES	5.2.5.3.3	Figure 3	ed	Figure 3 belongs to chapter 5.2.5.3.2	Move figure 3 before chapter 5.2.5.3.3	
101 ES	5.2.5.3.3		ed	This clause is not related to walls and doors and does not really belong to 5.2.5.3	Move this clause behind current clause 5.2.5.3.4 (5.2.5.3.4 becomes 5.2.5.3.3 and 5.2.5.3.3 becomes 5.2.5.3.3). Alternative move this clause to a more suitable chapter	
102 ES	5.2.5.3.3	Figure 3	ed	According 5.3.4.1, the max horizontal clearance is 35mm, Figure 3 shows 0.35mm	correct $\leq 0.35\text{mm}$ to $\leq 35\text{mm}$	

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103 ES	5.2.5.3.3	Figure 3	te	In some cases there is in front of the lift landing door a further door (provided from building side for entering e.g. an atrium) installed. If the space between the two doors has a certain dimension, there is a risk that a child may be trapped between. (other but similar risk is covered by Figure 7)	Define the maximum space to prevent a trapping between this doors.	
104 ES	5.2.5.4		ed	The “Note text” is not correctly formatted	Move the Note to a separate new line	
105 ES	5.2.5.5.1	3 <sup>rd</sup> sentence	te	Sentence not very comprehensible while referring to 5.8.1.1. Lowest part of the screen versus buffers on the counterweight → screen not more than 100 mm Requirement for perforation is missing	Improve understanding of the text, and Add specification regarding perforation based on EN ISO 13857	
106 ES	5.2.5.5.1	3rd paragraph	te	The toe trapping hazard for buffers fixed directly to the pit floor, would be less than for buffers travelling on the counterweight, as in the last ones the impact area is the floor, where the foot can stay (considering the same height and position requirements for the counterweight).	In no case shall it be less than 0.30m from the pit floor to the lowest part of the screen with the exception of buffers travelling on the counterweight (see 5.8.1.1) <b>or fixed directly to the pit floor without pedestal.</b>	

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107 ES	5.2.5.5.1		te	The considered area of application of the force shall be the same as for walls, floors or ceilings of the well or the car (clauses 5.2.1.8.2 and 5.4.3.2.2).	The screen shall have sufficient rigidity to ensure that when a force of 300N, <b>being evenly distributed over an area of 5cm<sup>2</sup> in round or square section</b> , is applied at right angles at any point of the screen, it shall not deflect to cause the counterweight to collide with it.	
108 ES	5.2.5.5.2		te	Specification regarding the rigidity is missing	Add text as defined in <b>5.2.5.5.1</b> The screen shall have sufficient rigidity to ensure that when a force of 300 N is applied at right angles at any point of the screen, it shall not deflect more to guarantee a free distance of 50 mm to moving parts of the other lift.	
109 ES	5.2.5.5.2.1	1 <sup>st</sup> paragraph		Not only the impact or trapping hazards shall be covered. The access from the pit of a lift to the pit area of other lift shall be prevented. Similar criteria to the ones established for the free vertical distance between the counterweight screen and the floor of the pit would be valid for the partition of the well, with the access restriction.	This partition shall extend at least from the lowest point of travel of the car, counterweight or balancing weight to a height of 2.5m above the floor or the lowest landing. <b>In no case shall it be more than 0.30m from the pit floor to the lowest part of the screen, considering additionally clause 4.3 and Annex B from EN ISO 13857.</b>	
110	5.2.5.6.1.1		te	Missing initial condition for further guided travel	Add "When the counterweight rests on its fully compressed buffer, the..." (same condition as	

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ES					for 5.2.5.6.1.2)	
111 ES	5.2.5.6.1.1		ed	The condition “when the counterweight rests on its fully compressed buffer(s)” has been moved from this article to the following one (5.2.5.7.1), so the situation is not clearly defined.	When for traction lifts the counterweight rests on its fully compressed buffer(s) the car guide rail lengths shall be such as would accommodate a further guided travel, expressed in metres, of at least $0,10 + 0,035 \cdot v^2$	
112 ES	5.2.5.6.1.3		ed	Reference to 5.2.5.7.3 is wrong	To replace by 5.2.5.7.2 and add reference at the end of the last sentence to 5.8.2.2.2.	
113 ES	5.2.5.7.1	Table	ed	Wrong number of table	Correct from Table 1 to Table 2	
114 ES	5.2.5.7.1	5 <sup>th</sup> paragraph	te	The sign should indicate which kind of posture is considered, for example: “Standing safety volume/s”.	A sign on the car roof readable from the landings giving access to the car roof shall clearly indicate the allowed number of persons and the kind of posture (Table 2) considered for the safety volume(s) accommodation.	
115 ES	5.2.5.7.1	Table 1	ed		Table 4 2 - Dimensions of safety volume in headroom.	
116 ES	5.2.5.7.1	Last Para	Te	It was agreed in the WG1 meeting in Paris, March 2011, to delete this requirement for marking. See N1058	Delete last paragraph.	

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117 ES	5.2.5.7.2	b)	Te	Reference to Table 2 is incorrect. This was meant to replicate the existing minimum requirement of EN81-1 / 2 to give 1.0 + 0.035v2 clearance above areas where persons could stand. Therefore the correct reference should be Table 1, Type 2.	Change "Table 2" to "Table 1, Type 2".	
118 ES	5.2.5.7.4	Figure 4	ed		Make all letters "A", ... in the Figure properly visible.	
119 ES	5.2.5.8.1	Table	ed	Wrong number of table	Correct from Table 2 to Table 3	
120 ES	5.2.5.8.1	4 <sup>th</sup> paragraph	te	The sign should indicate which kind of posture is considered, for example: "Standing safety volume/s".	A sign in the pit readable from the entrance(s) shall clearly indicate the allowed number of persons and the kind of posture (Table 3) considered for the safety volume(s) accomodation.	

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121 ES	5.2.5.8.1	Table 2	ed /te	Include the posture “crouching”, as in Table in clause 5.2.5.7.1, without reduced standing area.	Table 2 3. Dimensions of safety volume in the pit.			
					Type	Posture	Horizontal dimensions of the safety volume (m x m)	Height of the safety volume (m)
					1	Standing	0.40 x 0.50	2.00
					2	Crouching	0.50 x 0.70	1.00
122 ES	5.2.5.8.1	Last Para	Te	It makes more sense to mark the positions of the safety space.	Change requirement to the marking of at least one refuge space for each person that may be present in the pit.			
123 ES	5.2.5.8.2	a), 2)		Generally the safety gear is not at the lowest part..	for other <u>car frame parts</u> , safety gears, guide shoes, pawl devices, within a maximum horizontal distance from the guide rails according to <b>Figures 5 and 6</b> ;			
124	5.2.6				<b>Machinery spaces, <u>machine</u> and pulley</b>			

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ES					<b>rooms</b>	
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125 ES	5.2.6.1				<b>General provisions</b> The <del>spaces</del> <u>machinery spaces, machine and pulley rooms</u> and the associated working areas shall be suitably protected against environmental influences to be taken into consideration and provisions made for suitable areas for maintenance/inspection work and emergency operation. See <b>0.2.2</b> , <b>0.3.1</b> and <b>0.3.4</b> . See also <b>annex D</b>	
126 ES	5.2.6.2.3.2			To be consistent with previous one	On or near the emergency electrical operation buttons, there shall be markings to show the corresponding direction of movement <u>of the car</u>	
127 ES	5.2.6.3.2		ed	Last sentence and his impact remains unclear?	To delete this sentence or to combine with 5.2.6.3.2.4?	
128 ES	5.2.6.3.2.1. b)			Inconsistent with the requirements for safety volume (see 5.2.5.7.1): a crouching posture requires at least an area of 0.50x0.70m	A clear horizontal area of at least <del>0,50 m x 0,60</del> <u>0.50 m x 0.70 m</u> for maintenance and inspection of moving parts, <u>centred</u> at points where this is necessary and, if need be, manual emergency operation ( <b>5.9.2.3.1</b> ).	

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129 ES	5.2.6.3.2.4		ed	Ladders why only refer to 5.2.2.4 b) why not also refer to Annex F for relevant dimensions of such ladder or to the other relevant clauses of 5.2.2.4 ? ( see overlapping with annex F)		
130 ES	5.2.6.4.2.1 a) & b)		te	See also 5.2.6.3.2.1 and table 1 standing 0.4x0.5 and crouching 0,5 x 0,7	a) change 0,5 x 0,6 to 0,4 x 0,5 or go for 0,5 x 0,7 (see below)  b) Change to 0,5 x 0,7 m instead of 0,5 x 0,6	
131 ES	5.2.6.4.3.3 b)		ed	Width for emergency doors and inspection traps should be similar allowing passage of a person.	For both fixed dimensions 0.5 x 0.5 m	
132 ES	5.2.6.4.3.4 b)		ed	Inappropriate requirement phrasing. To permit to bypass a safety device is different to request to bypass. There is hardly a need to request bypassing but it is needed to permit bypassing in this context.	rephrase to:  The inspection control station in the car <b>is permitted to</b> <del>shall</del> render inoperative the electric safety device according to  <b>5.2.6.4.3.3 e);</b>	
133 ES	5.2.6.4.4.1	a)	ge	The word "retardation" is used.	We propose to use the word "deceleration" because it is more adequate for motion.	

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Date: 2nd of April 2012	Document:  Draft prEN 81-20:2011
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134 ES	5.2.6.4.4.2		ed	For clarity move this chapter to 5.2.2.3		
135 ES	5.2.6.7.1.1		te	The term “maintenance personnel” is used in these clauses and the term is undefined. However are these not “authorized persons” in the context of the clause?	Revise as follows: 5.2.6.7.1.1 Pulley room dimensions shall be sufficient to provide easy and safe access for <del>maintenance personnel</del> <u>authorized persons</u> to all the equipment.	
136 ES	5.3.1.4		Te	Clause <b>5.3.5.2.8 c)</b> requires gaps to be limited to 4mm.	Change text to give an exception for doors made from glass in the case of <b>5.3.5.2.8 c)</b>	
137 ES	5.3.5.2.1	1 <sup>st</sup> sentence	te	Many doors have a chicane which builds a labyrinth with the door frame, when the doors are closed. If you do the test according above rule, the door panel deflects, the chicane gets in touch with the frame and the deformation is limited. As soon as you open the door and the chicane is out of the range of the door panel and the deflection can be more.  If panels are to flimsy there is a risk to squeezing fingers in the gap between panel and	<b>Proposal:</b> <del>Complete landing doors, with their locks, and car doors shall have a mechanical strength such that in the locked position of landing doors and closed position of car doors:</del>  <u>Complete landing doors and car doors shall have a mechanical strength such that the doors fulfils following conditions in the closed and intermediate door position:</u>	

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				frame during door opening. Therefore the panel strength needs to be fulfilled also in the intermediate door position.		
138 ES	5.3.5.2.1 a)		te	a) When a force of 300 N, being evenly distributed over an area of 5 cm <sup>2</sup> in round or square section, is applied at right angles to the panel/frame at any point on either face they shall resist without: 1) Permanent deformation (e.g. less than 1 mm); 2) Elastic deformation greater than 15 mm; After such a test the safety function of the door shall not be affected.	Proposal: 1) Permanent deformation <del>more (e.g. less</del> than 1 mm; 2) Elastic ....	
139 ES	5.3.5.2.1	a)	Te	Elastic deformation of 15mm is not consistent with the requirements for <b>5.3.5.2.8. c)</b>	Change text to give an exception for doors made from glass in the case of <b>5.3.5.2.8 c)</b>	
140 ES	5.3.5.2.1	a) 1		Permanent deformation should be less than 1 mm; Term "e.g." is misleading, should be omitted	... shall resist without 1) Permanent deformation exceeding 1 mm	
141 ES	5.3.5.2.2	Figure 8	ed	Some given dimensions in various figures are not proper readable	Improve readability (character size and its arrangement)	
142 ES	5.3.5.2.2	Figure 8, Note 2	Te	Not possible to determine the worst case.	For safety reasons, both panels should be tested	

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143 ES	5.3.5.2.8		te		Add following text at the end <u>d) other equivalent methods.</u>	
144 ES	5.3.5.2.8	c)		4mm gap, although ensured at installation time, may not be maintained in time (i.e . There should be an additional prevention mean such a brush	c)- <del>Limiting</del> <u>Close</u> the gap between door panels and frame <u>with a mean preventing finger entrapment in all the height of the door to maximum 4 mm at least up to 1,6 m above sill.</u>	
145 ES	5.3.5.2.8	c)		This should be explained better	<u>Recesses (framed glass, etc.) shall not exceed 1 mm and shall be included in the 4 mm tolerance.</u> The maximum radius on the outer edge of the frame adjacent to the door panel shall not be more than 4 mm.	
146 ES	5.3.6.2			This standard can not admit that a person can be hurt by an automatic closing door	<del>Power operated doors shall be designed to reduce to a minimum the harmful consequences of a person being struck by a door panel.</del>	

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147 ES	5.3.6.2.1.1 c), d)		ed	<p><b>5.3.6.2.1.1 Automatic power operated doors</b></p> <p>(due to the revision of EN81-70; light curtain becomes mandatory)</p>	<p>The following applies:</p> <p>a) The effort needed to ...</p> <p>b) The kinetic energy of ...</p> <p>c) <del>A protective device against impact ...</del> <b>Move to d) 4)!</b></p> <p>d) <del>If the kinetic energy of the landing door and/or car door and the mechanical elements which are rigidly connected to it exceeds 4J at any point of its movement, a</del> A protective device shall automatically initiate reopening of the door in the event of a person crossing the entrance during the closing movement: NOTE Protective device of the car door and the landing doors could be common.</p> <p>1) The protection device shall ...</p> <p>2) The protection device shall ...</p> <p>3) The protective device may ...</p> <p><b>4)</b> In case of failure, <del>or deactivation</del> of the protective device, the kinetic energy <u>defined in 5.3.6.2.1.1 b)</u> of the door(s) shall <u>may</u> be lowered to a maximum of 4 J to keep lift in operation;</p> <p><b>5)</b> To counteract persistent obstructions</p>	
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				g) We propose to add a new requirement to avoid sharp edges.	<p>when closing the door, the protective device may be rendered inoperative after a predetermined time. In this case, the kinetic energy defined in <b>5.3.6.2.1.1 b)</b> shall not exceed 4 J during movement of the door with the protective device inoperative;</p> <p>6) An acoustic signal shall operate any time the door(s) is (are)closing and the protective device is inoperative;</p> <p>7) <u>In case of deactivation of the protective device a protective device against impact from the doors shall automatically initiate re-opening of the door(s) in the event of a person being struck by the door in crossing the entrance during the closing movement; NOTE Re-opening does not imply that the door shall open fully, but some re-opening shall occur</u></p> <p>e) The effort needed to prevent a folding ...  f) If a folding car door is going ...  g) If labyrinths or chicanes are ...  In the case of glass doors, the thickness ...  <u>The corners of any protrusion or leading edge should have a radius of minimum 4 mm or chamfer to reduce the risk of</u></p>	
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					<u>shearing.</u>	
148 ES	5.3.7.1			This is responsibility of local building regulations	<b>Local landing lighting</b>	
149 ES	5.3.7.2.1			Either we define test requirements or we define a type of glass with no further testing	1) Mechanical strength as specified in 5.3.5.2: breaking or damaging the glass during the door pendulum shock test per 5.3.5.2.2 a) is not considered as test failure. The glass panel shall not detach from the door 2) Laminated glass of minimum thickness of 3/0,76/3 mm;	
150 ES	5.3.7.2.1 b)		te	Car here ...be switched of car parked and doors closed	To add ... <u>and light up again when lift call button of the landing where the car is parked is activated.</u>	

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151 ES	5.3.8.2		te	<p>1<sup>st</sup> The risk of falling assessed in this clause is also applicable to passengers inside the car when the distance between the inner surface of the lift well and the sill is greater than 0.15 m and the car door is equipped with a mechanical lock according to clause 5.2.5.3.2.c).</p> <p>It shall also only be possible to open this lock in the car door if the car is in the unlocking zone of a landing door.</p> <p>2<sup>nd</sup> There is a wrong reference in clause 5.3.8.2.1</p> <p>3<sup>rd</sup> The shearing risk assessed in sub-clause 5.3.8.2.1 is also due to the opening of the car doors. Therefore the opening of the car door shall also prevent the start of the lift and prevent it from keeping in motion.</p> <p>4<sup>th</sup> It is proposed that the second sentence in sub-clause 5.11.2.4 be moved to this sub-clause as a new point, because it is of exclusive application to sliding doors, whilst the sub-clause 5.11.2.4 is applicable to electric safety devices in general. See comments to 5.11.2.4</p>	<p>The following rephrasing of the sub-clause is proposed:</p> <p><b>“5.3.8.2 Protection against shearing</b></p> <p><b>5.3.8.2.1</b> <i>With the exception of <del>5.3.11.2</del> 5.3.8.2.2 it shall not be possible in normal operation to start the lift nor keep it in motion if a landing door or car door or any of the panels in the case of a multi-panel door is open.</i></p> <p><b>5.3.8.2.2</b> <i>Operation with doors open is permitted in the unlocking zone to permit levelling or releveling at the corresponding floor level, provided the requirements of 5.12.1.4 are met.</i></p> <p><b>5.3.8.2.3</b> <i>However, in the case of horizontally sliding doors, as preparation to a normal operation (5.12.1.1) it is permitted when the car is in the door zone, to energize the machine and the electro-mechanical brake if the landing and car doors are about to terminate their closing movement, and the gap at the leading edges of the panels does not exceed 10 mm”.</i></p>	
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152 ES	5.3.9		ed	Landing and car doors	Put this text under 5.3.9.1 and not under the title	
153 ES	5.3.9.1		ed	Definition of “preliminary operations allowed” is not clearly defined nor is a reference to another clause given.  Assumption is that same conditions apply as under 5.3.8.2.1	add reference to 5.11.2.4	
154 ES	5.3.9.1.4		te	The locking elements and their fixings shall be resistant to shock, and be made or reinforced with metal.  Does it refer to the lock ?  Why only metal ?		
155 ES	5.3.9.3.2		ed	The last sentence of the 2 <sup>nd</sup> § would mean to take into account all height of persons whereas the requirements of 2 m vertical plan and max 2.7 m horizontal consider already average to expect length of normal persons.	Delete last sentence  <del>Emergency unlocking shall be possible without making use of climbing means such as stool, chair or ladder.</del>	
156 ES	5.3.9.3.5		ed	How to measure this 1.0 m horizontal from the permanent access means, what with the vertical distance? Can the permanent device also be used while standing on the ladder? Not only	<b>5.3.9.3.5</b> If there is no access door to the pit, other than the landing door, and if the door lock is not reachable <b>safely</b> within a maximum horizontal distance of 1,0 m from the permanent	

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				from pit floor Reachable safely means < 1m , so delete word safely.	access means according to <b>5.2.2.3</b> , a permanent installed device shall allow a person in the pit to unlock the door.	
157 ES	5.3.9.4.1		ed	The reference to one of the sub-clauses in the text is wrong.	Proposed rephrasing of the sub-clause: <i>“5.3.9.4.1 Each landing door shall be provided with an electric safety device in conformity with 5.11.2 for proving the closed position, so that the conditions imposed by <del>5.3.11.2</del> 5.3.8.2 are satisfied.”</i>	
158 ES	5.3.9.4.3		te	An additional safety device has been added to hinged landing doors, but the aim of this seems unclear. It is our opinion that this second device is not necessary; it should be taken into consideration that the present state of the art in relation with this type of doors does not include this element.  Moreover, from the phrasing of the sub-clause it is unclear whether this additional element is to be included always, or only when the main electric safety device in conformity with 5.3.9.4.1 is placed on the mechanical device proving the closed condition of the door.  In any case, the description of the new device is wrong, as it should say “... and a second <b>electric safety device in conformity with</b>	Removal of the additional element. The following rephrasing is proposed: <i>“5.3.9.4.3 In the case of hinged landing doors, this device shall be placed adjacent to the closing edge of the door or on the mechanical device proving the closed condition of the door <del>and a second switch according to 5.11.2 shall prevent normal operation of the car if any door is open. This switch shall not be accessible without using a tool”.</del></i>	

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				<b>5.11.2 ...</b> ” instead of “... a second switch... “		
159 ES	5.3.12		te	See also comment under 5.3.9.3.4	Normal operation versus for whatever reason: to be clarified	
160 ES	5.3.12		te	<p>The requirements for the closing of the doors when they participate to the fire protection of the building seem incomplete. The requirement as indicated in the sub-clause applies only to automatically operated landing doors, but it seem that the closure of the doors should also be required of manual doors when they participate to the fire protection.</p> <p>Moreover, it seems that closure of the doors that participate to fire protection should also be required in case of loss of electric supply.</p>	<p>1<sup>st</sup> Rephrasing of the title and text of the sub-clause:  <b>“5.3.12 Closing of landing doors”</b>  <i>In the case of lift landing doors participating to the fire protection of the building they shall be closed and locked in normal operation, after the necessary period of time, which may be defined according to the traffic using the lift, in the absence of a command for the movement of the car.</i>  <i>Automatically operated landing doors shall make use of the motorization and close automatically on activation of a fire management device.</i>  <i>Devices shall be included for manually operated doors to close them automatically in the event of fire.</i>  <i>Such doors participating to the fire protection of the building shall also be closed and locked in</i></p>	

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					<i>case of loss of power supply”.</i>	
161 ES	5.3.13.1		ed	See comment on 5.3.9.1		
162 ES	5.3.14.1		ed	The last paragraph calls for 5.3.16.2, which does not exist.	Replace 5.3.16.2 by 5.3.13.2.	
163 ES	5.3.15.1		te	It’s not clear if the car can be partly or completely opened in any zone with the lift in motion (how much and where is allowed to open?).  It’s understood that clause must be linked to clauses 5.3.15.2, 5.3.15.3, 5.3.15.5 and specially to 5.3.15.4. In this last case, it’s not clear if is always necessary or not to put a car door locking device so it shall not be possible to open the car door by more than 100mm from inside the car with the lift in motion outside of the zone defined in 5.6.7.5. The same conclusion can be done for the unlocking zone or the zone defined in 5.6.7.5.	The opening of the car door with the lift in motion, <u>where allowed in the cases described in 5.3.15.2, 5.3.15.3, <del>5.3.15.4</del> and 5.3.15.5</u> , shall require a force greater than 50 N.  Eliminate requirement 5.3.15.4)	

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164 ES	5.3.16	new	te	Take over the "Prohibition sign" from EN81-73 5.1.3 in this Standard, which is valid for all lifts.	<p><b>5.1.3 Prohibition sign</b> A prohibition sign according to ISO 3864-1:2002 shall be displayed near the lift so that it is easily seen on all landings. The size of this sign shall be at least 50 mm and the graphical symbol shall be as shown in Figure 1.</p>  <p>NOTE The following text may be added to the pictogram. "Do not use lift in the event of fire"</p> <p>Figure x - Pictogram "Do not use lift in the event of fire!"</p>	
165 ES	5.4.2.1		ED	The tables are wrongly referenced. All table numbers are wrongly referenced in the clause 5.4	<p>5.4.2.1 General case To prevent overloading of the car by persons, the available area of the car shall be limited. The car area shall be measured from wall to wall car body inner dimensions excluding finishes.</p>	

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					To this effect the relationship between rated load and maximum available area is given in <b>Table 5</b> .	
166 ES	5.4.2.1.1	Table	ed	Table No is wrong Table 3 - Rated load and ...	Correct table No Table <b>5</b> - Rated load and ...	
167 ES	5.4.2.2		TE	The title does not define the scope of the clause. It seems to include the electrically driven lifts, although the subclauses discard it. Add the word ‘Hidraulically’ for clarity and accuracy.	5.4.2.2 Hydraulically driven goods passenger lifts	
168 ES	5.4.2.2		ed	The example of calculations for the rated load and car area given after Table 6 should be transferred to the end of sub-clause 5.4.2.2 for clarity. The calculation should be included after all the appropriate terms and requirements have been introduced.	It is proposed to move the calculations to the end of the 5.4.2.2 sub-clause, after sub-clause 5.4.2.2.4.	
169 ES	5.4.2.2.1		te	The aim of this sub-clause is to call attention to the fact that in case the lift is for combined use of passengers and loads, the weight of the possible handling devices used for the loading and unloading of the car should be taken into consideration when calculating the rated load. Thus it is our opinion that no reference to sub-clause 5.4.2.1 is required and that the exception for the 3 <sup>rd</sup> sentence may be removed as it may	Proposed rephrasing of the sub-clause: “ <b>5.4.2.2.1</b> <i>In order to determine the rated load of the lift, both the load carried and the weight of the handling devices that may enter the car shall be taken into consideration.</i> “	

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**Comments and secretariat observations on "Safety rules for the construction and installation of lifts — Lifts for the transport of persons and goods — Part 20: Passenger and goods passenger lifts "**

Date: 2nd of April 2012	Document:  Draft prEN 81-20:2011
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				lead to confusion.		
170 ES	5.4.2.2.2	Table	ed	Table No is wrong  Table 4 - Rated load and maximum available car area (for hydraulic goods passenger lifts)	Correct table No  Table 6 - Rated load and ...	
171 ES	5.4.2.2.2	Note	ed	The note with the example calculations should follow 5.4.2.2.4 as the calculations are to determine compliances with 5.4.2.2.4 as well as 5.4.2.2.2. Also the wording of the example is confusing.	Move the example to after 5.4.2.2.4 and revise the wording in part as follows:  b) <u>Calculation of load for lift components in accordance with 5.4.2.2.4 is:</u> - according to 5.4.2.1, Table 5, equivalent load to area full with passengers is: - 5 m <sup>2</sup> = 2500 kg - According to note 3 at bottom of Table 5, 19,04 m <sup>2</sup> - 5 m <sup>2</sup> = 14,0 m <sup>2</sup> / 0,16 m <sup>2</sup> = 88, then 88 x 100 kg = 8800 kg. - Total maximum load for area = 2500 kg + 8800 kg = 11300 kg; c) <del>According to 5.4.2.2.4, the</del> <u>The calculation of lift components as listed, e.g. car sling and safety gear, etc., shall be carried out for a load of 11300 kg;</u>	

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172 ES	5.4.2.2.2		te	<p>In our opinion there is no reason for the different requirements in relation to the relation between car area and rated load between hydraulic and electric lifts. Goods and passenger lifts require larger surfaces due to the nature of the load; however taking into consideration energy efficiency aspects among others, it does not make much sense to penalize de size of the machines. Therefore all the safety requirements and coefficients in case the car should be filled with people can be maintained without penalizing the size and power consumption of the machines. In a similar way to what has been common practice in hydraulic lifts, it is our opinion that the machines of electric lifts should not be penalized. The reason for this difference probably has historic roots, considering the fact that there used to be no suitable technical solutions for electric lifts for large loads; the present state of the art has allowed for these difficulties to be overcome. It is thus our opinion that the requirements of sub-clause 5.4.2.2.2 should be applicable not only to hydraulic but also to electric goods passenger lifts and that the sub-clause should be rephrased as proposed.</p>	<p>1<sup>st</sup> Proposed rephrasing of the sub-clause:  <b>“5.4.2.2.2 For goods passenger lifts, hydraulically driven The available area of the car may be greater than the value determined from Table 5, but shall not exceed the value determined from Table 6 for the corresponding rated load.”</b></p> <p>2<sup>nd</sup> Proposed rephrasing of the title for Table 6:  <b>“Table 6 Rated load and maximum available car area (for hydraulic goods passenger lifts).”</b></p>	
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173 ES	5.4.2.2.3		te	<p>The pressure limit stated in the sub-clause of 1.4 times the pressure jack and piping are designed for can also be reached in lifts without balancing weights in which the weight of the car is smaller than the rated load. Being true that the condition is easier to fulfill in those lifts with balancing weights it is not exclusive of such lifts. Thus, the sub-clause should also apply to lifts with no balancing weights.</p> <p>Additionally the sub-clause is of application only to hydraulic lifts and this should be highlighted in the text.</p> <p>A rephrasing of the sub-clause is proposed.</p>	<p>Rephrasing of the sub-clause text:</p> <p><b>“5.4.2.2.3 For hydraulic lifts, the available car area shall be such that a load in the car resulting from Table 5 (5.4.2.1) shall not cause a pressure exceeding from 1,4 times the pressure the jack and the piping are designed for. Special attention should be paid to hydraulic lifts with balancing weights.”</b></p>	
174 ES	5.4.2.2.4		te	<p>In coherence with the comments to sub-clauses 5.4.2.2.1 and 5.4.2.2.2, the requirements of this sub-clause should not be only for hydraulic lifts, but also be of application to electric lifts.</p> <p>It is our proposal to rephrase the sub-clause to take also into consideration the appropriate elements of electric lifts.</p>	<p>Proposed rephrasing of the sub-clause:</p> <p><b>“5.4.2.2.4 The design of the car, the car sling, the drive motor, the motor axis, the traction sheaves or rope drums, the braking means, the connection between the ram and the car, the suspension means, the car safety gear, the rupture valve, the restrictor/one-way restrictor, the pawl device, the guide rails and the buffers shall be based on a load resulting from Table 5 (5.4.2.1).”</b></p>	

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175 ES	5.4.2.3.1	Table	ed	Table No is wrong  Table 5 - Number of passengers and minimum car available area	Correct table No  Table 7 - Number of passengers ...	
176 ES	5.4.3.2.2	a)		Permanent deformation should be less than 1 mm? Then term "e.g." should be omitted	1) Any permanent deformation exceeding 1 mm	
177 ES	5.4.3.2.2	b)		Same as a)	1) <del>Visual</del> Any permanent deformation exceeding 1 mm	
178 ES	5.4.3.2.2 a)		te	a) When a force of 300 N, being evenly distributed over an area of 5 cm <sup>2</sup> in round or square section, is applied at right angles to the wall at any point from the inside of the car towards the outside, it shall resist without: – Any permanent deformation (e.g. less than 1 mm); – Elastic deformation greater than 15 mm.	Proposal:  - Permanent deformation <del>more (e.g. less</del> than 1 mm; - Elastic ....	
179 ES	5.4.3.2.2	a)	ed	The requirement in this clause is written as an example and is inappropriate for a standard. It should be written in positive language.	Revise 5.4.3.2.2 a) in part as follows: - Any permanent deformation <del>(e.g. less greater</del> than 1 mm); <u>is not permitted</u>	

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180 ES	5.4.3.2.2	b)	ed	The maximum deformation requirement in this clause is written as an example and is inappropriate for a standard. It should be written in positive language. Also the use of "visual" deformation is inappropriate when giving a required dimension.	Revise 5.4.3.2.2 b) as follows: When a force of 1000 N, being evenly distributed over an area of 100 cm <sup>2</sup> in round or square section, is applied at right angles to the wall at any point from the inside of the car towards the outside it shall resist without <del>visual</del> permanent deformation ( <del>e.g. less than</del> <u>greater than</u> 1 mm).	
181 ES	5.4.3.2.3	Table	ed	Table No is wrong Table 6 - Flat glass panels ...	Correct table No Table <b>8</b> - Flat glass panels ...	
182 ES	5.4.3.2.3			Handrail requirements should be the same as for balustrade on car roof	Car walls with glass placed lower than 1,10 m from the floor shall have a handrail at a height <del>between 0,90 m and of</del> 1,10 m. This handrail shall be fastened independently from the glass.	
183 ES	5.4.3.2.3		ed	In the second sentence a wrong reference is made to prEN 81-50, as the reference should be given to <b>figure 19</b> . The text "figure" is missing.	The following rephrasing is proposed for the last sentence: <i>"The soft pendulum shock shall be carried out for glass car wall and its structural elements, with the device according to prEN 81-50, 5.14.2.2 and a falling height of 700 mm (see <b>prEN 81-50, figure 19</b>).</i>	

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184 ES	5.4.3.2.3		te	As written car walls partly of glass can be construed to be excluded from the testing.	Revise 5.4.3.2.3 in part as follows: The hard pendulum shock shall be carried out for <del>glass</del> car wall and its structural elements with the device according to prEN 81-50, 5.14.2.1, and a falling height of 500 mm (see prEN81-50, Figure 19). The soft pendulum shock shall be carried out for <del>glass</del> car wall and its structural elements with the device according to prEN 81-50, 5.14.2.2 and a falling height of 700 mm (see prEN 81-50, 19).	
185 ES	5.4.3.2.3	a)	ed	The maximum deformation requirement in this clause is written as an example and is inappropriate for a standard. It should be written in positive language.	Revise 5.4.3.2.3 a) in part as follows: a) They shall resist without permanent deformation ( <del>e.g. less than</del> <u>greater than</u> 1 mm);	
186 ES	5.4.4			Consider national regulations	Unless higher requirements indicated by local building regulations, the car floor....	
187 ES	5.4.5		te	No requirements for maximum projections are given.	Take over same requirement as given in 5.2.5.3.4 c) also for the car apron.  <u>Any projections shall not exceed 5 mm.</u> <u>Projections exceeding 2 mm shall be chamfered at least 75° to the horizontal;</u>	

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188 ES	5.4.5.1			To be consistent with 5.2.5.3.4	Each car sill shall be fitted with an apron, which extends <u>at least</u> to the full width of the clear landing entrance <u>plus 25 mm on both sides</u> , which it faces	
189 ES	5.4.5.2		te	The user of the standard should be advised that a longer apron might be necessary when protection against unintended movement is required.	Add a note as follows: <u>Note See also 5.6.7.5 b)</u>	
190 ES	5.4.6.3			Inconsistent with 5.2.3.4.d): d) Emergency doors shall have a minimum height of 1,80 m and a minimum width of 0,35 m;	If emergency doors exist, they shall measure at least 1,80 m high and 0,50 m wide.	
191 ES	5.4.7.1		te	<b>5.4.7.1</b> In addition to <b>5.4.3</b> , the car roof shall fulfil the following requirements: a) The car roof shall have sufficient strength to support the maximum number of persons as indicated in <b>5.2.5.7.1</b> . However, the car roof shall resist to a minimum force of 2.000 N at any position on an area of 0,30 m x 0,30 m without permanent deformation.	Proposal: However, the car roof shall resist to a minimum force of <del>2.000</del> <u>1.000</u> N per person at the minimum standing area of 0,12 m <sup>2</sup> without permanent deformation.  Anteriormente eran 1000 N. Se propone dejar como estaba.	

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192 ES	5.4.7.2.1		ED	There are contradictions with the indications on clauses 5.4.7.2.1 and 5.4.7.2.2. The clause 5.4.7.2.1 should be revised.	<b>5.4.7.2.1</b> The car roof shall be provided with a balustrade where: a) The free distance in a horizontal plane, beyond and perpendicular to its outer edge of the car roof to the wall of the well exceeds 0,30 m. The free distances shall be measured to the wall of the well allowing a larger distance in recesses, the width or height of which is less than 0,30 m. b) There are not lift component(s) that fulfill point 5.4.7.2.2. Where a balustrade is not provided a toe board of 100 mm high on the perimeter of the car roof shall be provided.	
193 ES	5.4.7.2.2 b)		TE	The deflection of a component under a force is defined subjectively.	b) The deflection of this component under a horizontal force of 300 N applied at right angles from the inside to outside of the car roof it shall resist without: <ul style="list-style-type: none"> <li>Any permanent deformation (e.g. less than 1 mm);</li> <li>Elastic deformation greater than 30 mm.</li> </ul>	
194 ES	5.4.7.3	Figure 11	ed	Some dimensions given in the Figures are not or not properly readable	Make the 3 values clear visible and easy readable	

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195 ES	5.4.10.1		ed	There seems to be no need for a separate paragraph for the second sentence of the clause. A rephrase of the clause with both sentences 1 and 2 in the same paragraph is suggested for easier reading.	Proposed rephrasing of the text in the sub-clause: <i>“The car shall be provided with electrical lighting that is permanently installed ensuring a light intensity of at least 50 lux on the control devices and at floor level at any point not less than 100 mm from any wall.”</i>	
196 ES	5.4.10.2		te	Lighting systems exist that detect when one lamp burns out / is not functional, and illuminate other lamp. These should be permitted where there is notification.	5.4.10.2 There shall be at least two lamps connected in parallel. <u>Lighting systems using only one of the two required lamps shall be permitted where each lamp individually provides the required lighting intensity and the system is arranged to automatically illuminate the second lamp immediately following a failure of the first lamp and an audible or visual signal notifies authorized personnel when one lamp is not functional.</u>	
197 ES	5.4.10.2			The wording may lead to think that LED lighting is not accepted	There shall be at least two <u>lighting means</u> connected in parallel	

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198 ES	5.5.1.3.1 (new)		te	When jacks with hydraulic synchronizing means are not properly working, the lift should switched off on safety reason.	EN81-2 12.2.5.5 When jacks with hydraulic synchronizing means are used an electric device shall be provided to prevent a start for a normal journey when the pressure exceeds the full load pressure by more than 20 %.	
199 ES	5.5.6.1		ed	For speeds not exceeding 3,0 m/s, means (e.g. chains, ropes) to compensate the weight of the suspension ropes can be used, as requested to ensure adequate traction, or hoisting motor power.  Whenever compensating ...	Improved wording:  For speeds not exceeding 3,0 m/s, means (e.g. chains, ropes) to compensate the weight of the suspension ropes can be used <del>as requested</del> to ensure adequate traction, or hoisting motor power	
200 ES	5.5.6.4		ed	Harmonize wording of compensation means with 5.5.6.1 and correction of text:  Compensation means, such as compensating ropes or chains or belts, and their terminations, shall be capable of withstanding, with a factor of safety of 5, any static forces to which the means is subjected.	Proposal  Compensation means ( <del>as e.g. chains, ropes</del> ) <del>such as compensating ropes or chains or belts</del> , and their terminations, shall be capable of withstanding, with a <del>safety</del> factor of <del>safety of</del> 5, any static forces to which the means is subjected.	
201	5.5.7.1 and		te	There is a contradiction between the 5.5.7.1 and 5.5.7.2 regarding the rope retainer.	The need and the definition of nip guards have	

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ES	5.5.7.2				to be better defined.	
202 ES	5.6.1		te	Clause 5.2.5.4 foresees the use of safety gears as means of protection of the spaces located below the balancing weights. However there are no specific requirements for this safety gears, such as may be found in clause 9.6 in EN 81-2 for hydraulic lifts.	Add requirements for safety gears for balancing weights as a new sub-clause: <b>“5.6.1.4 Precautions against free fall of the balancing weight.”</b> <b>5.6.1.4.1</b> <i>In the case envisaged in 5.2.5.4 the balancing weight, if any, shall also be equipped with safety gear.</i> <b>5.6.1.4.2</b> <i>The safety gear of a balancing weight shall be tripped either:</i> a) <i>by an overspeed governor (5.6.2.2.1), or</i> b) <i>by breakage of the suspension means (5.6.2.2.2), or</i> c) <i>by a safety rope (5.6.2.2.3).</i>	
203 ES	5.6.1.2	Table 10- Table 7	Ed		5.6.1.2. Calls table 11 Actual table number is Table 8	
204 ES	5.6.1.2	Table	ed	Table No is wrong Table 7 - Protection means for traction ...	Correct table No Table <b>10</b> - Protection means for traction ...	
205 ES	5.6.1.2	Table 7	ed		Change title “table 7” by “table 10”	

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206 ES	5.6.1.3	Table	ed	Table No is wrong Table 8 - Combinations of precautions ...	Correct table No Table 11 - Combinations of precautions ...	
207 ES	5.6.1.3	Table 8	ed		Change title “table 8”by “table 11”	
208 ES	5.6.1.3	Table 11	te	For direct acting lifts, the combination of an electrical anti-creep system against creeping plus a restrictor against free fall or descent with excessive speed should not be allowed. This combination seems to have been included in the table as a misprint.	Removal of this combination as possible from table 11.	
209 ES	5.6.1.3		te	In the second sentence of the clause it indicates that protection against unintended movement according to 5.6.7 shall be provided always. However such additional protection is only required when an electrical anti-creep system is used as a precaution against creeping, but not when either the safety gear or a pawl device are used.	Proposed rephrasing of the sub-clause: “ <b>5.6.1.3</b> For hydraulic lifts, devices or combination of devices and their actuation, shall be provided in accordance with table 11. In addition, when an electrical anti-creep system is provided according to 5.12.1.10, protection against unintended movement according to 5.6.7 shall be provided.”	

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**Comments and secretariat observations on “Safety rules for the construction and installation of lifts — Lifts for the transport of persons and goods — Part 20: Passenger and goods passenger lifts ”**

Date: 2nd of April 2012	Document:  Draft prEN 81-20:2011
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1	2	(3)	4	5	(6)	(7)
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210 ES	5.6.2.1.1.3 c)  5.6.2.2.1.6 e)  5.6.3.9  5.6.6.12		ed	the type of safety gear must be shown	Specify which type of safety gear has to be shown, give an example (product type given by the manufacturer)  (This is valid for all safety component)  <b>Change “Type” by “model”</b>	
211 ES	5.6.2.1.1.3	d)	ed		Change With by Within “If adjustable the safety gear shall be marked with the information to be able to clearly identify it within its certificated limits of use”.	
212 ES	5.6.2.1.2.2		te	The concept of “several safety gears” leads to confusion and should be clarified. It is our opinion that progressive safety gears need to be used when there are more than one actuation means for the safety gears, as it is impossible to guarantee that all actuation means shall trip at the same time.	The following rephrasing of the sub-clause is proposed: <b>“5.6.2.1.2.2 If the car or counterweight or balancing weight carries several safety gears they shall all be of the progressive type. Safety gears sharing the same actuation means (e.g. overspeed governor) are considered to be a single safety gear even though it more than one stopping block or means may be used. The use of several means of actuation implies the</b>	

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					<i>consideration of several safety gears. “</i>	
213 ES	5.6.2.1.3	Title and text	ge	The word “retardation” is used.	We propose to use the word “deceleration” because it is more adequate for motion.	
214 ES	5.6.2.1.4.3				After the release of the safety gear it shall require the intervention of a <del>competent</del> <u>authorised</u> person to return the lift to service.	
215 ES	5.6.2.1.6.4		ed	This is no longer state-of-the-art. There are ample of samples displaying safe function relying on pneumatic, electric, hydraulic actuation means. E.g. see ISO 13849 series of standards.	Remove clause (It prevents new technology and has no added value in the context of this standard).  Permitir otras tecnologías con niveles de seguridad equivalente  <del>Safety gears shall not be tripped by devices, which operate electrically, hydraulically or pneumatically.</del>	
216 ES	5.6.2.2.1		te	For more safety, It must be kept this point of the actual rule The requirement of EN81-1:1998+A3:2009 - 9.9.3 shall be kept. <i>Could have an influence on current car and cwt governor tripping speed settings as well as car safety gear acceptance tests. When it is likely to trip the cwt governor during final acceptance</i>	Add text from EN81-1:1998+A3:2009 - 9.9.3 <u>The tripping speed of an overspeed governor for a counterweight or balancing weight safety gear shall be higher than that for the car safety gear according to 9.9.1, not, however exceeding it by more than 10 %.</u>	

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				<i>test, special procedures are needed.</i>		
217 ES	5.6.2.2.1.1 b)		te	The clause after the NOTE does not only apply to lifts with very heavy load.	Separate this requirement under a new d) "Overspeed governors using only traction....."	
218 ES	5.6.2.2.1.1. a)			3) is not correct Rated speed 0.63 => maxi 1.5 : delta : 0.87 between rated speed and tripping speed Rated speed 1.1 => maxi 1.6 : delta 0.5 !	Tripping of the over speed governor .. at least equal to 115 of the rated speed and less than: 3) 1,5 m/s for progressive safety gear used for rated speeds not exceeding 1,0 m/s; or 4) 1,25 · √ 0,25 in metres per second for progressive safety gear for rated speeds exceeding 1,0 m/s.	
219 ES	5.6.2.2.1.1	d)	te	For more security, It must be kept this point of the actual standard.	d) The safety gear of the car, counterweight or balancing weight shall each be tripped by its own overspeed governor. When the rated speed does not exceed 1 m/s, the safety gear of a counterweight or balancing weight may be tripped by the failure of the suspension gear or by a safety rope.	
220 ES	5.6.2.2.1.2		Te	Removed requirements for the minimum force applied by the rope, as indicated in 9.9.4 of EN81-1	Include requirement again: twice the necessary force to engage the safety gear or 300N.	
221 ES	5.6.2.2.1.2 c)			Overspeed governor rope conditions. Why limitaitaion to 6 mm. Market and technology	Eliminate 6 mm condition. Do not impose a limit if the same safety level can be achieved.	

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				offers other reduced solutions?		
222 ES	5.6.2.2.1.6	d)	Ge	To be included under General Provisions, not here		
223 ES	5.6.2.2.1.6.	d)	ed	Indications moved to the general provisions in clause 5.6.2.2.1.1.	<del>e) On the speed governor a data plate shall be fixed indicating:</del> <del>1) The name of the manufacturer of the speed governor;</del> <del>2) The type examination certificate number;</del> <del>3) The type of the overspeed governor;</del> <del>4) The actual tripping speed for which it has been adjusted.</del>	
224 ES	5.6.2.2.1.6	e) 3)	ed		Change “Type” for “model”	
225 ES	5.6.2.2.2 c)		Te	In the case of counterweight safeties the means added to perform the test involve additional risks and complexity to the elevator Today, the counterweight safeties activated by rope tension loss are verified safely	In the case of counterweight safeties, eliminate the references to do the test under normal operation and “outside the well”. Add “it shall be possible a test of the safety gear and its operating mechanism without endangering persons”	
226 ES	5.6.3.1	Second paragraph	ge	The word “retardation” is used.	We propose to use the word “deceleration” because it is more adequate for motion.	

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227 ES	5.6.3.1		te	It is our opinion that the concept of $t_d$ should be clarified as being the time it takes for the flow to reach zero when starting from the maximum flow.	The following rephrasing is suggested: “ $t_d$ is the braking time ( <b>time for the flow to reach from <math>Q_{max}</math> to zero</b> ) in seconds”	
228 ES	5.6.3.9		te	The indication of the information that should appear on the data plate of the rupture valve in relation with the type examination is outdated. The same requirement as is included in the rest of similar sub-clauses in the standard should be used.	Proposed rephrasing of point b): “b) <i>The type examination sign and reference certificate number</i> ”.	
229 ES	5.6.3.9 & 5.6.4.7		te	Why is the data plate requirement different than for other safety components (e.g. overspeed governor)?	Apply same data plate requirements as e.g. 5.6.2.2.1.6 e)  e.g. Typ examination sign does not exist	
230 ES	5.6.5.1		te	The difference between “rated load” and “a load according to Table 5” has not been made in the rest of sub-clauses in the standard, but only in this sub-clause. This may lead to the confusion that the load according to Table 5 is only to be considered in this sub-clause.  In coherence with the rest of the Standard, the “rated load” should be used in this clause as the	Rephrase the sentence: “ <i>The pawl device shall operate only in the downward direction, and be capable of stopping the car with a load according to Table 5 (5.4.2.1) for lifts according to 5.4.2.1 and 5.4.2.2 the rated load and maintaining it stationary on fixed stops.</i> ”	

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				load the pawl device shall be capable of stopping.		
231 ES	5.6.6.2		te	A prescribes redundancy does only add benefit if a monitoring (prove interval) ensures to detect a loss of redundancy. see also 5.6.7.3	Add a requirement to monitor <b>for loss</b> of redundancy if relying on built-in redundancy	
232 ES	5.6.6.2			If the machine brake, as called under 5.9.2.2 is used, there is no need to implement 2 brakes as the redundancy is already stated in 5.9.2.2.1	The means shall be capable of performing as required in <b>5.6.6.1</b> without assistance from any lift component that, during normal operation, controls the speed or retardation, or stops the car, unless there is built-in redundancy. A mechanical linkage to the car, whether or not such linkage is used for any other purpose, may be used to assist in this performance	
233 ES	5.6.6.2	First paragraph	ge	The word “retardation” is used.	We propose to use the word “deceleration” because it is more adequate for motion.	
234 ES	5.6.6.3	First paragraph	ge	The word “retardation” is used.	We propose to use the word “deceleration” because it is more adequate for motion.	

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235 ES	5.6.6.6		ed	Understanding of this clause has to be clarified, is travel on the car roof to the shaft head considered as access to the car.	Proposal: <del>The release of the means shall not require the access to the car or the counterweight.</del> <u>The release of the means shall not require the access to the well.</u>	
236 ES	5.6.6.7			Replace "competent" by "authorised" (see definition)	After the release of the means the return of the lift to normal operation shall require the intervention of a <del>competent</del> <u>authorised</u> person	
237 ES	5.6.6.10 b)		ed	Clause 5.6.2.7.2.5 does not exist, in EN81-1 clause 9.9.9 is referenced which is 5.6.2.2.1.5 now in EN81-20	correct reference form <del>5.6.2.7.2.5</del> to <u>5.6.2.2.1.5</u>	
238 ES	5.6.6.10 b)		ed	Referenced clause 5.6.2.2.1.4 addresses accessibility but in EN81-1 the corresponding reference is to clause 9.9.4 addressing tensile forces and groove requirements	correct reference from <del>5.6.2.2.1.4</del> to <u>5.6.2.2.1.1 b) and 5.6.2.2.3 a) [or 5.6.2.2.1.1 d) see under findings to this clause above]</u>	
239 ES	5.6.6.11		ed	Wrong reference to EN81-50, 5.9	correct reference to EN81-50, <del>5-9</del> <u>5.7</u>	

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240 ES	5.6.7		te	Take all the comments written in document CEN/TC10/WG1 N883 Questions/Answers into account.	Add the requirements for "prevention of unintended ".	
241 ES	5.6.7.1	first sentence	te	Safety can be provided via inherently safe design. Therefore each risk can either be prevented or mitigated (see ISO 12100). UCMP can be achieved through detection device and brake (mitigation) or through inherent safe design.	Rephrase to:  Lifts shall be provided with a means <u>to prevent</u> <u>or</u> to stop unintended car movement away from ....	

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242 ES	5.6.7.3	3 <sup>rd</sup> paragraph	te	In case were a failure is detected on the brake or on the valves, the doors shall kept closed.	<p>...</p> <p>In the case of using the machine brake, self-monitoring could include verification of correct lifting or dropping of the mechanism or verification of braking force. <del>If a failure is detected, next normal start of the lift shall be prevented.</del></p> <p>In the case of using two electrically commanded hydraulic valves operating in series, self-monitoring implies separate verification of correct opening or closing of each valve under the empty car static pressure.</p> <p>If a failure is detected, <del>car and landings doors shall be closed and next</del> normal start of the lift shall be prevented.</p> <p>Self-monitoring is subject to type examination.</p>	
243 ES	5.6.7.3	First paragraph	ge	The word "retardation" is used.	We propose to use the word "deceleration" because it is more adequate for motion.	

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244  ES	5.6.7.3		te	The requirements for the type examination referred to in this sub-clause and related to the self monitoring of the protection system against unintended car movement are nowhere to be found either in the Standard nor in the prEN 81-50 standard. It is our opinion that the requirements for the self-monitoring should be similar to those referred to in sub-clause 5.9.2.6.	Eliminate the last phrase: <del>Self monitoring is subject to type examination</del>  NOTE: It should be explicitly mentioned that "Self monitoring" is NOT a safety device (function) according to 5.11.2.	
245  ES	5.6.7.5	Figure 11	ed	Some dimensions given in the Figures are not or not properly readable	Make the values clear visible and easy readable	
246  ES	5.6.7.6	First paragraph	ge	The word "retardation" is used.	We propose to use the word "deceleration" because it is more adequate for motion.	
247  ES	5.6.7.9			Replace "competent" by "authorised" (see definition)	When the means has been activated or the self-monitoring monitoring has indicated a failure of the stopping element of the means, its release or the reset of the lift shall require the intervention of a <del>competent</del> <u>authorised</u> person	

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248 ES	5.7.2.1.2		te	<p>1. Two clause with same number 5.7.2.1.1 correct numbering to 5.7.2.1.2 for 2<sup>nd</sup> clause (on page 88)</p> <p>2. The combination of permissible deflections with the deflection of brackets, play in the guide shoes and straightness of the guide rails shall be taken into account. It would be difficult to consider/evaluate the play of the guide shoe, e.g. damping element</p>	<p>1. Add correct numbering to 5.7.2.1.2 for 2<sup>nd</sup> clause.</p> <p>2. The combination of permissible deflections with the deflection of brackets, <del>play in the guide shoes and</del> straightness of the guide rails shall be taken into account.</p>	
249 ES	5.7.2.2			Loads due to handover tests are not considered	To add: - <u>All loads induced due to handover tests</u>	
250 ES	5.7.2.3.4		te	In the case of goods passenger lifts, it should be indicated which load needs to be considered for each of the load cases considered in t, whether it should be the rated load or the load according to Table 5.	<p>Proposed rephrasing of the sub-clause:  <b>“5.7.2.3.4 In the load cases “normal use” and “safety device operation”, the rated load Q of the car shall be evenly distributed over those three quarters of the car area being in the most unfavourable position.</b></p> <p><b><i>In the case of goods passenger lifts, the rated load shall be considered for load cases corresponding to normal operation, and the load resulting from Table 5 for load cases</i></b></p>	

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					<b><i>corresponding to safety device operation".</i></b>	
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251 ES	5.7.2.3.5			Usage of sliding clips regardless travel height allows you to ignore Fp? Why is limited to 40 m in case of non-sliding clips?. Should be possible to change limit to 45 m travel height	Rewrite note: Eliminate height limit (40 m ) in NOTE <del>... this however shall be limited by 40 m travel</del>	
252 ES	5.7.2.3.6		te	It is our consideration that the selection of the vertical force to be applied on the sill while loading or unloading a car should not be related to the rated load of the lift but rather to the intended use of the lift. We propose to differentiate between passenger lifts, goods passenger lifts, and goods passenger lifts where forklift truck loading is expected.	Proposed rephrasing of the sub-clause: "5.7.2.3.6 Whilst loading or unloading a car, a vertical force on the sill $F_s$ has to be assumed to act centrally on the sill of the car entrance. The amount of the force applied on the sill shall be: - <b><math>F_s=0.4 \cdot g_n \cdot Q</math> for passenger lifts;</b> - <b><math>F_s=0.6 \cdot g_n \cdot Q</math> for goods passenger lifts;</b> - <b><math>F_s=0.85 \cdot g_n \cdot Q</math> for goods passenger lifts in case of forklift truck loading. "</b>	
253 ES	5.7.3	Table	ed	Table No is wrong Table 9 - Loads and forces to be taken into ...	Correct table No Table 12 - Loads and forces to be taken ...	

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254 ES	5.7.4.4	Table	ed	Table No is wrong Table 10 - Impact factors	Correct table No Table <b>13</b> - Impact factors	
255 ES	5.7.4.5	Table	ed	Table No is wrong Table 11 - Safety factors for guide rails	Correct table No Table <b>14</b> - Safety factors for guide rails	
256 ES	5.8.1.1		te	Requirements in clause 4.3 (Table 7) and Annex B from EN ISO 13857:2008 shall be met, regarding the free vertical distance from the floor to the screen, for counterweight buffers travelling on the counterweight or fixed to the pit floor without pedestal .	An obstacle is not required for buffer(s) fixed to the counterweight <b>or fixed directly to the pit floor without pedestal</b> , where a screen according to 5.2.5.5.1 is extended to not more than <b>400mm the height according to clause 4.3 and Annex B from EN ISO 13857</b> above the pit floor.	
257 ES	5.8.1.2		te	How is it ensured that it is impossible to squeeze a hand between the buffers and the buffer impact area? The buffers and the buffer impact area shall be outside the projection of the car roof.	In addition to the requirements of <b>5.8.1.1</b> positive drive lifts shall be provided with buffers on the car <b>top or in the headroom</b> to function at the upper limit of travel. The impact area of these buffers shall be outside the projection of the car roof.	

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**Comments and secretariat observations on “Safety rules for the construction and installation of lifts — Lifts for the transport of persons and goods — Part 20: Passenger and goods passenger lifts ”**

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258 ES	5.8.1.5		te	The sub-clause is of application only to hydraulic lifts. Moreover, it should be made clearer that requirements for re-synchronization are applicable only to telescopic cylinders. For more clarity, a rephrasing of the sub-clause is proposed.	Proposed rephrasing of the sub-clause: <b>“5.8.1.5 For hydraulic lifts, the buffers shall maintain the car stationary at a distance not exceeding 0,120 m below the level of the lowest landing, when carrying the rated load. This does not apply to devices ensuring re-synchronization for telescopic cylinders, for which at least one stage shall not hit its down travel mechanical limit”</b>	
259 ES	5.8.1.9 c)		ed	The type of buffer must be shown	Specify which type of buffer has to be shown, give an example	
260 ES	5.8.2.1.2.1 e)		te		Add new e) Define a maximum peak retardation	
261 ES	5.8.2.1.2.1	a) b)	ge	The word “retardation” is used (two times).	We propose to use the word “deceleration” because it is more adequate for motion.	
262 ES	5.8.2.1.2.2		ed	Wrong references to clause 5.2.5.8.3 that does not exist	Correct references to <a href="#">5.2.6.1.2</a> , <a href="#">5.2.5.6.3.2</a> , <a href="#">5.2.5.7.1</a> , <a href="#">5.2.5.8.1</a> and <a href="#">5.2.5.8.2</a>	

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263 ES	5.8.2.1.2.2		ed	missing references to clause 5.2.5.6.2.2 above	add clause 5.2.5.6.2.2	
264 ES	5.8.2.1.2.2		ed	missing references to clauses base on finding to clause 5.2.5.6.1.1 above	add reference to clause 5.2.5.6.1.1	
265 ES	5.8.2.2.3	a) b)	ge	The word “retardation” is used (two times).	We propose to use the word “deceleration” because it is more adequate for motion.	
266 ES	5.9.2.2.2.1	second paragraph, last sentence	te	With today’s drive systems, the machine brake acts only as holding brake to keep the car stationary. Therefore, in case of a failure of one braking element, the machine brake should still be capable to keep the car stationary. This additional requirement seems to be needed as a failure of the machine brake may be detected while the door is open.  Since traveling is permitted up to 110 % of rated load, a defective machine brake shall be capable to keep the car stationary or be able to decelerate the car loaded up to the upper bound of overload protection.	rephrase to:  If one of the components is not working a sufficient braking effort to <b>keep the car stationary</b> <b>or</b> decelerate the car, travelling downwards at rated speed and with <b>110 %</b> rated load shall continue to be exercised.	
267	5.9.2.2.2.1		ed	Harmonize the wording according to the definition	Replace “set” by “brake set”	

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268 ES	5.9.2.2.2.1	First paragraph	ge	The word “retardation” is used (two times).	We propose to use the word “deceleration” because it is more adequate for motion.	
269 ES	5.9.2.2.2.8		ed	This paragraph is related to emergency operation and shall be shifted to 5.9.2.3.	Move paragraph to 5.9.2.3.	
270 ES	5.9.2.2.2.8		Te	It should be possible to move the car at any possible load condition, up to the nominal load	It shall be possible to move a car to an adjacent floor, under any load condition up to its nominal load, by releasing the break manually	
271 ES	5.9.2.3		te	The location of the means of emergency electrical operation called for in sub-clause 5.9.2.3.2 should be included as a separate sub-clause as the requirements also affect manual means for emergency operation.	Add requirements in a the following new sub-clause: “ <b>5.9.2.3.3</b> <i>The means for emergency operation according to 5.9.2.3.1 or to 5.9.2.3.2 shall be located in the relevant machinery space:</i> <ul style="list-style-type: none"> <li>- <i>machine room (5.2.6.3),</i></li> <li>- <i>machinery cabinet (5.2.6.5.1),or</i></li> <li>- <i>on the emergency test panel(s) (5.2.6.6).”.</i></li> </ul>	

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**Comments and secretariat observations on "Safety rules for the construction and installation of lifts — Lifts for the transport of persons and goods — Part 20: Passenger and goods passenger lifts "**

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272 ES	5.9.2.3.1		te	There is no need to mandate for a manual means of emergency operation. Could be manual or electric (under 400 N)	Rewrite <b>5.9.2.3.1</b> If the manual effort required to move the car in the upward direction with its rated load does not exceed 400 N the machine <del>shall be</del> <b>could be</b> provided with a manual means of emergency operation allowing the car to be moved to a landing. If the means for moving the car can be driven by the lift moving, then it shall be a smooth, spokeless wheel.	
273 ES	5.9.2.3.1.1		ed	double sentence	If the wheel is removable, it shall be located in an easily accessible place in the machine room. It shall be suitably marked if there is any risk of confusion as to the machine for which it is intended. <del>If the means is removable, it shall be located in an easily accessible place in the machinery space. It shall be suitably marked if there is any risk of confusion as to the machine for which it is intended.</del> If the means is removable or can be ....	
274 ES	5.9.2.3.2		ed	Wrong reference to clause 5.11.2.4 (Operation of electrical safety device) instead to Control of electrical emergency operation	change reference form <del>5.11.2.4</del> to <u>5.12.1.6</u>	

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275 ES	5.9.2.3.2		ed	Wrong clause reference.	Proposed rephrasing of the sub-clause: “ <b>5.9.2.3.2</b> If the effort defined in <b>5.9.2.3.1</b> is greater than 400 N, a means of emergency electrical operation shall be provided in accordance with <del>5.11.2.4</del> <b>5.12.1.6</b> ”	
276 ES	5.9.2.4	1 <sup>st</sup> sentence	te	Why should a speed limit only be applicable to downward movements?	rephrase to:  The speed of the lift car, half loaded, in <b>upwards and</b> downward motion, in mid-travel, excluding all acceleration and retardation periods, shall not exceed the rated speed by more than 5 %, when the supply is at its rated frequency, and the motor voltage is equal to the rated voltage of the equipment <sup>8)</sup> .	
277 ES	5.9.2.4	First paragraph	ge	The word “retardation” is used (two times).	We propose to use the word “deceleration” because it is more adequate for motion.	

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278 ES	5.9.2.5.3 a)		ed	Clause 5.9.2.5.3 a) - It is a similar request, but regarding the elements that interrupt the power to the motor (at the present condition they are a contactor and the ACVF IGBTs).	See Int. No 552) Proposal: Text should be improved because it is possible to interpret this clause in different ways.  Add 5.9.2.5.3 e)  A system consisting of: 1) A contactor interrupting the current at all poles. The coil of the contactor shall be released at least before each change in direction. If the contactor does not release, any further movement of the lift shall be prevented; and  2) An adjustable speed electrical power drive system with a safe torque off function according to EN 61800-5-2, 4.2.2.2 fulfilling at least SIL2 requirements.	
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279 ES	5.9.2.5		ed	<p>The clause lends itself to confusion; the contents of sub-clauses 5.9.2.5.1 and 5.9.2.5.3 a) are the same and could be reunified for easier reading.</p> <p>Rephrasing is also proposed for the "Ward-Leonard" systems, also in search of clarification and simpler reading.</p>	<p>Proposed rephrasing of the complete clause.</p> <p><b>"5.9.2.5 Removing the power which can cause rotation of the motor</b></p> <p><i>The removal of power which can cause rotation of the motor by means of an electric safety device, in conformity with 5.11.2, shall be controlled as detailed below.</i></p> <p><b>5.9.2.5.1 Motors supplied directly from A.C. or D.C. mains</b></p> <p><i>One of the following methods shall be used:</i></p> <p>a) <i>Two independent contactors the contacts of which shall be in series in the supply circuit. If whilst the lift is stationary one of the contactors has not opened the main contacts, further movement of the car shall be prevented at the latest at the next change in the direction of motion. A failure of this monitoring function shall have the same result.</i></p> <p>b) <i>A system consisting of:</i></p> <ol style="list-style-type: none"> <li>1) <i>A contactor interrupting the current at all poles. The coil of the contactor shall be released at least before each change in direction. If the contactor does not release, any further movement of the lift shall be prevented; and</i></li> <li>2) <i>A control device blocking the flow of</i></li> </ol>	
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					<p><i>energy in the static elements; and</i></p> <p>3) <i>A monitoring device to verify the blocking of the flow of energy each time the lift is stationary. If during a normal stopping period, the blocking of the flow of energy by the static elements is not effective, the monitoring device shall cause the contactor to release and any further movement of the lift shall be prevented.</i></p> <p>c) <i>PESSRAL consisting of a controlling stage and a stage removing the power which can cause rotation of the motor together fulfilling SIL3 requirements as given in 5.11.2.6.</i></p> <p>d) <i>An adjustable speed electrical power drive system with a safe torque off function according to EN 61800-5-2, 4.2.2.2 fulfilling SIL3 requirements.</i></p> <p><b>5.9.2.5.2 Drive using a "Ward-Leonard" system</b>  <i>One of the following methods shall be used:</i></p> <p>a) <i>Two independent contactors shall interrupt, either:</i></p> <ol style="list-style-type: none"> <li>1) <i>The motor generator loop; or</i></li> <li>2) <i>The excitation of the generator; or</i></li> <li>3) <i>One the loop and the other the</i></li> </ol>	
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					<p><i>excitation of the generator.</i></p> <p><i>If whilst the lift is stationary, one of the contactors has not opened the main contacts, further movement of the car shall be prevented, at the latest at the next change in direction of motion. A failure of this monitoring function shall have the same result.</i></p> <p><i>In cases 2) and 3) effective precautions shall be taken to prevent the rotation of the motor in case of a residual field, if any, in the generator (e.g. suicide circuit).</i></p> <p>b) A system consisting of:</p> <ol style="list-style-type: none"> <li>1) A contactor interrupting the excitation of the generator of the motor generator loop. The coil of the contactor shall be released at least before each change in direction of motion. If the contactor does not release, any further movement of the lift shall be prevented. A failure of this monitoring function shall have the same result, and</li> <li>2) A control device blocking the flow of energy in the static elements; and</li> <li>3) A monitoring device to verify the blocking of the flow of energy each</li> </ol>	
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					<p><i>time the lift is stationary. If during a normal stopping period, the blocking by the static elements is not effective, the monitoring device shall cause the contactor to release and any further movement of the lift shall be prevented.</i></p> <p><i>Effective precautions shall be taken to prevent the rotation of the motor in case of a residual field, if any, in the generator (e.g. a suicide circuit).</i></p>	
280 ES	5.9.2.6		ed	As a consequence of the proposed rephrasing of sub-clause 5.9.2.5, the references in sub-clause 5.9.2.6 need to be corrected accordingly.	<p>Proposed rephrasing of the text:  <b>“5.9.2.6 Control devices and monitoring devices</b>  <i>Control devices according to <del>5.9.2.5.2.2 b) or 5.9.2.5.3 b) 2) and monitoring devices according to 5.9.2.5.2.2 b) 3) or 5.9.2.5.3 b) 3) to 5.9.2.5.1 b) 2) or 25.9.2.5.2 b) 2) and monitoring devices according to 5.9.2.5.1 b) 3) or 5.9.2.5.2 b) 3) need not to be safety circuits according to 5.11.2.3.</del></i></p> <p><i>These devices shall only be used provided the requirements of 5.11.1 are met to achieve comparability to <del>5.9.2.5.3 a) 5.9.2.5.1 a)</del>”</i></p>	
281	5.9.3.2.3.2	b)	ge	The word “retardation” is used (two times).	We propose to use the word “deceleration” because it is more adequate for motion.	

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282 ES	5.9.3.2.4.2	b)	ge	The word "retardation" is used (two times).	We propose to use the word "deceleration" because it is more adequate for motion.	
283 ES	5.9.3.4		te	It would seem that some of the possible means of stopping the machine in the case of hydraulic lifts have not been considered. Additionally, a rephrasing to make the sub-clause more similar to that applicable to electric lifts (5.9.2.5) is suggested. A full rephrasing of the sub-clause is proposed.	Proposed rephrasing of the sub-clause: <b>"5.9.3.4 Stopping the machine and checking its stopped condition</b> <i>A stop of the machine due to the operation of an electric safety device, in conformity with 5.11.2, shall be controlled as detailed below.</i> <b>5.9.3.4.1 Upwards motion</b> <i>For upwards motion, either:</i> a) <i>The supply to the electric motor shall be interrupted by at least two independent contactors, the main contacts of which shall be in series in the motor supply circuit.</i> <i>If whilst the lift is stationary, one of the contactors has not opened the main contacts, further movement of the car shall be prevented, at the latest at the next change in direction of motion. A failure of this monitoring function shall have the</i>	

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					<p><i>same result; or</i></p> <p>b) <i>A system consisting of:</i></p> <ol style="list-style-type: none"> <li>1) <i>A contactor interrupting the current at all poles. The coil of the contactor shall be released at least before each change in direction. If the contactor does not release, any further movement of the lift shall be prevented; and</i></li> <li>2) <i>A control device blocking the flow of energy in the static elements; and</i></li> <li>3) <i>A monitoring device to verify the blocking of the flow of energy each time the lift is stationary. If during a normal stopping period, the blocking of the flow of energy by the static elements is not effective, the monitoring device shall cause the contactor to release and any further movement of the lift shall be prevented.</i></li> </ol> <p>c) <i>The supply to the electric motor shall be interrupted by one contactor and the supply to the by-pass valves (in</i></p>	
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					<p><i>accordance with 5.9.3.5.4.2) shall be interrupted by at least two independent electrical devices connected in series in the supply circuit of these valves. In this case the temperature monitoring device of the motor and/or the oil (5.10.4.3, 5.9.3.11) need to act on a switching device other than this contactor in order to stop the machine; or</i></p> <p>d) <i>The electric motor shall be stopped by a PESSRAL consisting of a controlling stage and a stage stopping the motor together fulfilling SIL3 requirements as given in 5.11.2.6, or</i></p> <p>e) <i>The electric motor shall be stopped by an adjustable speed electrical power drive system with a safe torque off function (STO) according to EN 61800-5-2, 4.2.2.2. fulfilling SIL3 requirements.</i></p> <p><b>5.9.3.4.2 Downwards motion</b></p> <p><i>For downwards motion, the supply to the down direction valve(s) shall be interrupted either:</i></p> <p>a) <i>By at least two independent electrical devices connected in series. If whilst the lift is stationary, one of the contactors has not</i></p>	
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					<p><i>opened the main contacts, further movement of the car shall be prevented, at the latest at the next change in direction of motion. A failure of this monitoring function shall have the same result, or</i></p> <p>b) <i>Directly by the electrical safety device, provided it is suitable rated electrically, or</i></p> <p>c) <i>By a Pessral consisting of a controlling stage and a stage interrupting the supply together fulfilling SIL3 requirements as given in 5.11.2.6.</i></p> <p><b>5.9.3.4.3 Control devices and monitoring devices</b></p> <p><i>Control devices according to 5.9.3.4.1 b)2) and monitoring devices according to 5.9.3.4.1 b) 3 need not to be safety circuits according to 5.11.2.3"</i></p>	
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284 ES	5.9.3.5.5		te	The clause text may lead to confusion; the location of the required filters should be stated more clearly.	Proposed text of the sub-clause: “A filter or similar device shall be installed in the circuit between the tank and the pump(s), and another in the circuit between the shut-off valve and the non return and down direction valve. The filter or similar device between the shut-off valve, the non return valve(s) and the down direction valve shall be accessible for inspection and maintenance.”	
285 ES	5.9.3.8.1		ed	The reference should be made to the specific section in clause 1 and not to the general text of the clause.	Proposed text of the sub-clause: “ The rated speed upwards $v_m$ and downwards $v_d$ shall not be greater than 1,0 m/s ( <del>see 1</del> ) ( <b>see 1.3 b</b> ).”	

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286 ES	5.9.3.9		te	In this clause relative to emergency operation for hydraulic lifts, no mention is made to the necessary checking of the car position in lifts with more than 2 stops, as per EN 81-2+A3 section 12.9.3, whereas it is included in the appropriate sub-clause relative to electric lifts. This should be included as a new sub-clause.	<p>Add the following sub-clause:</p> <p><b>“5.9.3.9.3 Checking of the car position</b></p> <p><i>If the lift serves more than two levels, it shall be possible to check whether the car is in an unlocking zone by a means, which is independent of the power supply, from the relevant machinery space:</i></p> <ul style="list-style-type: none"> <li>- machine room (5.2.6.3)</li> <li>- machinery cabinet (5.2.6.5.1), or</li> <li>- the emergency and test panel(s) (5.2.6.6) where the devices for emergency operations are fitted (5.9.3.9.1 and 5.9.3.9.2).</li> </ul> <p><i>This requirement is not applicable to lifts, which are fitted with a mechanical anti-creep device.”</i></p>	
287 ES	5.10.1.1.5		te	The clause uses the term “service level” which is undefined. It could be interpreted that it is the “standing area”. If it is then use “standing area” which is used extensively in the standard or define what it is.	<p>Change “Service area” by Standing area.</p> <p>Change “control gear” by <b>Control Panel</b></p>	

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288 ES	5.10.1.1.6		te	A better descriptive word for this is “emit” not “generate”.	Revise as follows: 5.10.1.1.6 <del>Heat generating components</del> <u>Components that emit heat</u> (for example heat sinks, power resistors) shall be so located that the temperature of each component in the vicinity remains within the permitted limit.	
289 ES	5.10.1.3.1	Table	ed	Table No is wrong Table 12 - Insulation resistance	Correct table No Table <b>15</b> - Insulation resistance	
290 ES	5.10.3.1.1		te	The first sentence of the sub-clause makes no reference to contactors necessary to stop the machine in <u>hydraulic lifts</u> as per 5.9.3.4. Reference to this clause should also be included. Moreover in the last sentence of the sub-clause, the additional reference sub-clauses for hydraulic lifts should be included according to 5.9.3.4	Proposed rephrasing of the first sentence of the sub-clause: <b>“5.10.3.1.1 The main contactors, i.e. those necessary to stop the machine as per 5.9.2.5 and per 5.9.3.4, shall comply with EN-60947-4-1 and shall ...”.</b>	

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291 ES	5.10.3.1.1		te	The last sentence of the sub-clause makes no reference to the requirement of mirror contacts for the contactors necessary to stop the machine in hydraulic lifts as per 5.9.3.4. Reference to this clause should also be included.	Proposed text for the last sentence of the sub-clause: <i>“ These contactors shall have mirror contact(s) according to EN 60947-4-1 Annex F in order to ensure the functionality according to 5.9.2.5.1, 5.9.2.5.2.1, 5.9.2.5.2.2.b) 1), 5.9.2.5.3 a), 5.9.2.5.3 b) 1), <b>5.9.3.4, 5.9.3.4.1 and 5.9.3.4.3, i.e. detect the non-opening of a main contact.</b>”</i>	
292 ES	5.10.3.2.2		ed	It is not clear as to what requirements the statement “Devices meeting the requirements of 5.11.2.2.3 for creepage distances and clearances or which themselves fulfil the requirements of EN 60947-4-1 and EN 60947-5-1 fulfil the above mentioned requirements.” applies.	Revise editorially to make it clear what is permitted to be superseded.	
293 ES	5.10.4.2	2 <sup>nd</sup> sentence	ed	The proposed protection can't be achieved by standardized products. The main risk for passenger is a burning car door motor and not for other motors (e.g. fans).	Proposal for improvement:  <del>5.10.4.2 Protection of motors against overheating shall be provided for each motor. The exception for motors below 0,5 kW of EN 60204-1 does not apply.</del>  <u>The exceptions for motors below 0.5 kW of EN 60204-1:2006 does not apply for door drive</u>	

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					<u><a href="#">motors, but for other motors.</a></u>	
294 ES	5.10.4.3 5.10.4.4		te	This requirement applies not only to electric devices or hydraulic fluid. So it could be generalizes and hence the two sections can be merged.	merge 5.10.4.3 and 5.10.4.4 and rephrase to:  If the design temperature of <del>electrical</del> equipment provided with a temperature monitoring device is exceeded and the lift should not continue to operate, then the car shall stop at a landing such as the passengers can leave the car. An automatic return to normal operation of the lift shall only occur after sufficient cooling down.	
295 ES	5.10.4.4		te	The reason for this requirement to be different to the requirement in sub-clause 5.10.4.3 seems unclear. Risks related to the increase in temperature in oil are not of an immediate nature, similarly to those related to increase in temperature in electric lift motors. In this view it is our opinion that the requirement should be the same for hydraulic and electric lifts and that the lift should be allowed to continue its movement until a landing is reached as no immediate risk arises from gradual temperature increase.	1 <sup>st</sup> Removal of sub-clause 5.10.4.4 and inclusion of the requirement in sub-clause 5.10.4.3 with the following proposed rephrasing:  "5.10.4.3 If the design temperature of electrical equipment, <b>hydraulic machine motor and/or oil</b> provided with a temperature monitoring device is exceeded and the lift should not continue to operate, then the car shall stop at a landing such as the passengers can leave the car. An automatic return to normal operation of the lift shall only occur after sufficient cooling down."  2 <sup>nd</sup> Modify the clause reference in sub-clause 5.9.3.12 (previously 5.9.3.11) as follows:	

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					<p><b>“5.9.3.12 Protection against overheating of the hydraulic fluid</b></p> <p><i>A temperature detecting device shall be provided. This device shall stop the machine and keep it stopped in accordance with <del>5.10.4.4</del> 5.10.4.3”.</i></p>	
296 ES	5.10.5.1.2		ed	<p>The requirement included in section d) related to main switches that are not easily accessible from the control cabinet applies to all three previous sections: a), b) and c), and should thus not be listed as section d but as a common requirement.</p> <p>Additionally the sentence is hard to understand due to missing coma and redundant information. This sentence does not need to repeat the purpose of the main switch or devices as described in EN 60204-1:2006, 5.5.</p>	<p>Proposed rephrasing of the sub-clause: “5.10.5.1.2 The switch shall be located:</p> <ul style="list-style-type: none"> <li>a) In the machine room ...</li> <li>b) Where no machine room exists ...</li> <li>c) At the emergency and test panels ...</li> </ul> <p>If the main switch is not <b>easily</b> accessible from the control <del>cabinet</del> cabinet(s), the drive system or the lift machine, <b>then</b> device(s) according to EN 60204-1:2006, 5.5 shall be provided <b>at these locations. for disconnecting (isolating) electrical equipment to enable work to</b></p>	

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297 ES	5.10.6.3.2 a) 2)		te	The IEC defines different things for SELE, SELV circuit and SELC system. The first and the last refer to each other (see IEC 851-15-08 and IEC 826-12-31). SELV circuit had been defined in IEC 60950-1 with another definition, focused on telecommunication equipment. Therefore, to avoid confusion injected by IEC, refer to SELV system or SELV circuit as intended. Here seems SELV system to be meant.	rephrase to: they are part of SELV or PELV <del>circuits</del> <u>systems</u> ;	
298 ES	5.10.8.1			It should be possible to Lock Tagging out this switch	A switch shall control the supply to the circuit for lighting and socket outlets of the lift car. This switch can be lock tagged out.	
299 ES	5.10.8.2		te	It should be possible to combine the lighting of different working spaces together.	In the machinery <u>and pulley</u> spaces, other than those in the well, a switch shall be located near to its access(es) controlling the supply for lighting. See also <b>5.2.1.4.2</b> , Well lighting switches... <u>The lighting circuits of the well, of the machinery and pulley spaces and of the emergency and test panels may be combined in one circuit.</u>	

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300 ES	5.10.8.2		te	Additional lamps for well lighting (5.2.1.4.1) require definitions how to separate this supply on the car roof from the car light supply and the lift supply in order to guarantee safe working on the equipment. There must be sufficient lighting even in case the car roof needs to be made free of voltage completely.	Add: <u>Where a part of the well lighting is located on the car roof, it must be possible to disconnect this part of the well light.</u>	
301 ES	5.11.1	First paragraph	ed	The word "in" in the following sentence: "...,5.15 in shall not, on its own, be the cause of a dangerous malfunction of the lift"	"...,5.15 shall not on its own, be the cause of a dangerous malfunction of the lift"	
302 ES	5.11.1.3		ed	Wrong reference to clause 5.9.2.2.3. This clause does not exist	correct to 5.9.2.2.2.3	
303 ES	5.11.1.3			Correct reference 5.9.2.2.3	5.9.2.2.2.3	

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304 ES	5.11.1.3		ed	The condition “An earth fault in the circuit controlling the brake according to...” leads to confusion as it may mean both earthing or lost of earthing, while we are trying to protect against accidentally earthing as for the safety chain. The reference to 5.9.2.2.3 should be 5.9.2.2.2.3	The earthing to the metalwork or the earth of a circuit in which there is an electric safety device shall: a) Either cause the immediate stopping of the machine; or b) Prevent restarting of the machine after the first normal stop. Return to service shall only be possible by manual resetting. <del>(An earth fault)</del> <u>The earthing to the metalwork or the earth</u> in the circuit controlling the brake according to <b>5.9.2.2.2.3</b> shall immediately initiate stopping of the machine and de-energizing of the brake.	
305 ES	5.11.2.1.1 a) & b)		ed	Wrong reference to clause 5.9.2.6, should be 5.9.2.5	correct to 5.9.2.5	
306	5.11.2.1.1	b) 4)	ed	There is a missing point in “5.11 2.6”	“5.11.2.6”	

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ES						
307 ES	5.11.2.1.1		te	The text of section a) includes a reference to a wrong sub-clause in the standard; it should make reference to sub-clause 5.9.2.5 instead of 5.9.2.6.  Additionally, reference to the applicable sub-clause related to contactors for hydraulic lifts should be included.	The following rephrasing is suggested: <i>“a) Either one or more safety contacts satisfying 5.11.2.2. directly cutting the supply to the contactors referred to in <del>5.9.2.6</del> 5.9.2.5 and 5.9.3.4 or their relay contactors; or ...”</i>	
308 ES	5.11.2.4	2. paragraph	te	What is the justification for this complicate requirement? The validation of it if hardly feasible without additional sensors.  Considering the requirements related to unintended car movement protection and the permit to relevel at any time, This requirement appears to be almost obsolete. If the door is open, the car ought to be in an unlocking zone (see 5.12.1.1.4)	We propose simpler wording  <del>In the case of horizontally sliding doors, as preparation to a normal operation (5.12.1.1), it is however permitted, when the car is in the door zone, to energize the machine and the electro-mechanical brake if the landing and car doors are about to terminate their closing movement, and the gap at the leading edges of the panels does not exceed 10 mm.</del>  <u>In the case of horizontally sliding doors that are coupled with the landing doors, as preparation to a normal operation (5.12.1.1), it is however permitted to energize the machine and the electro-mechanical brake while the door is closing.</u>	

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309 ES	5.11.2.4	3 <sup>rd</sup> & 4 <sup>th</sup> paragraph	ed	Wrong reference to clause 5.9.2.6 in 3 <sup>rd</sup> & 4 <sup>th</sup> paragraph, should be 5.9.2.5	correct to 5.9.2.5	
310 ES	5.11.2.4		te	The second sentence of the sub-clause applies exclusively to horizontal sliding doors, whilst the sub-clause is applicable to electric safety devices in general. This requirement could easily be moved to sub-clause 5.3.8 as a new point 5.3.8.2.3	Removal of the second sentence in clause 5.11.2.4: <i>“5.11.2.4 ... likewise be broken. <del>In the case of horizontally sliding doors, as preparation to a normal .... Of the panels does not exceed 10 mm”.</del></i> See comments to sub-clause 5.3.8.2.	
311 ES	5.11.2.4		te	Similar to comment to sub-clause 5.11.2.1.1: the third sentence includes a reference to a wrong sub-clause in the standard: it should make reference to sub-clause 5.9.2.5 instead of 5.9.2.6. Additionally, the references to the applicable sub-clauses related to hydraulic lifts are not included.	The correct text would be as follows: <i>“The electric safety devices shall act directly on the equipment controlling the supply to the machine in accordance with the requirements of <del>5.9.2.6</del> 5.9.2.5 and 5.9.3.4”.</i>	

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**Comments and secretariat observations on "Safety rules for the construction and installation of lifts — Lifts for the transport of persons and goods — Part 20: Passenger and goods passenger lifts "**

Date: 2nd of April 2012	Document:  Draft prEN 81-20:2011
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312 ES	5.12.1.2.3		te	In subsection d) of the sub-clause, there is a wrong reference due to the proposal to include the preparation operations in the door section (see comments to 5.11.2.4). Moreover, there is a mistake in the wording.	Proposed rephrasing of the sub-clause: <b>"5.12.1.2.3 In the event of overload:</b> a) <i>users shall be informed by an audible and a visible signal in the car;</i> b) <i>Automatic power operated doors shall be brought into the fully open position;</i> c) <i>Manually operated doors shall remain unlocked;</i> d) <i>Any preliminary operation in accordance with <del>5.11.2.4</del> 5.3.8.2.3 and shall be nullified"</i>	
313 ES	5.12.1.2.3		te	- Visible information: define a symbol and make it as part of the standard. - Audible information: a buzzer or a voice message for those with difficulties in watching the control panel.	To create § 5.12.1.2.4 <u>Visible information according to 5.12.1.2.3 shall be placed on or close to the car operating panel.</u> <u>The following pictogram shall be used:</u>	
314 ES	5.12.1.3.2		te	It is important that the car or counterweight not strike the buffers above their rated speed.	Revise as follows: 5.12.1.3.2 If the slowdown is not effective these devices shall interrupt the power supply of the machine and the brake <u>in such a way that, if the car or the counterweight comes into contact with the buffers, the striking speed shall not exceed</u>	

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					<u>that for which the buffers were designed.</u>	
315 ES	5.12.1.4 a)		ed	Wrong reference to clause 5.3.11.1, should be 5.3.8.1	correct to 5.3.8.1	
316 ES	5.12.1.5.1.2 c)			Push button 'RUN' Some maintenance tasks require the use of one hand while operating the control station with the other hand. All buttons are supposed to be protected against involuntary action.	A push button "RUN" protected against accidental operation no needed. Stop push button provides safety enough. An alternative could be the duplication of contacts.	
317 ES	5.12.1.5.2.1	f) and g)	ed	If the inspection speed is already 0,3m/s or less, then there is no need to slowdown or stop before the free vertical distance above the standing areas on the car roof is 2,0 m. The word “before” is also ambiguous: how long before it happens? In this situation, closer than 2m, after stopping and then resuming the inspection movement, the usual inspection speed (higher than 0,3m/s) should be allowed. The same applies on the pit.	f) <u>when</u> the free vertical distance above the standing areas on the car roof is 2,0 m in inspection operation from the car roof <u>and the inspection speed is over 0,3m/s</u> : 1) the speed shall be reduced to 0,30 m/s; or 2) the lift shall be stopped in upwards movement. After stopping of the lift, further upwards movements <u>at the normal set inspection speed</u> shall be possible after the up button of the inspection control box is pushed again; g) <u>when</u> the free vertical distance above the standing areas in the pit is 2,0 m in	

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					<p>inspection operation from the pit <u>and the inspection speed is over 0,3m/s:</u></p> <p>1) The speed shall be reduced to 0,30 m/s; or</p> <p>2) The lift shall be stopped in downwards movement. After stopping of the lift, further downwards movements <u>at the normal set inspection speed</u> shall be possible after the down</p> <p>button of the inspection control box is pushed again;</p>	
318 ES	5.12.1.5.2.1 j)		te	<p>This requirement does not comply with ESR 1.2.2 of the machinery directive: "Where there is more than one control position, the control system must be designed in such a way that the use of one of them precludes the use of the others, except for stop controls and emergency stops." MD-Guide: " <b>§197 Multiple control positions</b> The requirements set out in the eighth paragraph of section 1.2.2 concerns machinery provided with two or more control positions</p>	<p>Ensure that the lift is blocked if more than one inspection control station or emergency electrical operation station is switched on.</p>	

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				intended to be used in turn, either by a single operator or by two or more operators, to carry out different tasks or control the machinery during different phases of its operation. In order to avoid confusion or contradictory commands, the control devices at each control position must be linked to the control system in such a way that the use of one control position precludes the use of the others, except for stop controls and emergency stops."		
319 ES	5.12.1.5.2.1		te	The position of the inspection switch should be made clear.	Revise as follows: 5.12.1.5.2.1 Inspection operation switch Engagement of the inspection operation switch <u>in the inspection position</u> shall satisfy the following conditions for functioning simultaneously:	
320 ES	5.12.1.5.2.1	f) 2) and g) 2)	te	Once in this position the car should only be permitted to continue in the reduced headroom direction at the lower speed.	Revise as follows: f) 2) the lift shall be stopped in upwards movement. After stopping of the lift, further upwards movements <u>at no more than 0,30 m/s</u> shall be possible after the up button of the inspection control box is pushed again; g) 2) The lift shall be stopped in downwards movement. After stopping of the lift, further downwards movements shall be possible <u>at no more than 0,30 m/s</u> after the down button of the	

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					inspection control box is pushed again;	
321 ES	5.12.1.5.2.2			It shall be possible to operate the "RUN" button and a direction button with one hand simultaneously. The movement of the car in inspection operation shall solely depend on constant pressure on a direction and the "RUN" push-button.	No easy to operate with only one hand two buttons at the same time.	
322 ES	5.12.1.5.2.3		te	<p><u>Inspection control station(s)</u> On the inspection control station(s) the following information shall be given (see Figure 15):</p> <p>a) <u>For normal operation, the following pictogram:</u></p>  <p>b) <u>for inspection operation, the following pictogram:</u></p>  <p><u>on or near the inspection operation switch:</u></p>	The proposed symbols do not comply with IEC 80416-1:2008 Basic principles for graphical symbols for use on equipment - Part 1: Creation of graphical symbols for registration. Symbols shall be registered in ISO 7000 in order to have common symbols for any kind of lift.	

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323 ES	5.12.1.6		te	<p>Because of the inclusion of the emergency electrical operation in sub-clause 5.2.3.3, this system is applicable also to hydraulic lifts as well as to electric lifts. However requirements and clause references corresponding to hydraulic lifts have not been considered.</p> <p>Thus the appropriate references to the applicable clauses should be included, as well as the electric devices which the emergency electrical operation shall bypass.</p> <p>Finally, it is considered that the stand-by supply considered for emergency electrical operation should not be optional, but mandatory as it would seem that for an emergency rescue operation in case of loss of supply this standby supply would be required.</p> <p>For all the above, a rephrasing of sub-clause 5.12.1.6.1 is proposed.</p>	<p>The following rephrasing is proposed:  <b>"5.12.1.6 Control of emergency electrical operation</b>  <b>5.12.1.6.1</b> <i>If a means of emergency electrical operation is required in accordance with 5.9.2.3.2 or 5.2.3.3 an emergency electrical operation switch in conformity with 5.11.2 shall be installed. The machine shall be supplied from the normal main supply or from the standby supply # <del>there is one.</del></i>  <i>The following conditions shall ....</i>            ....  <i>d) The emergency electrical operation switch shall render inoperative by itself or through another electric switch in conformity with 5.11.2 the following electric devices:</i></p> <ol style="list-style-type: none"> <li>1) <i>Those for the detection of the abnormal relative extension of ropes and/or chains, according to 5.5.5.3;</i></li> <li>2) <i>Those mounted on the safety tear, according to 5.6.2.1.5;</i></li> <li>3) <i>Those of the overspeed governor,</i></li> </ol>	
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					<p><i>according to 5.6.2.2.1.6 a) and b) and 5.6.2.2.3 e)</i></p> <p>4) <i>Those mounted on the ascending car overspeed governor protection means, according to 5.6.6.5;</i></p> <p>5) <i>Those mounted on the buffers according to 5.12.2;</i></p> <p>6) <i>Those used for controlling the abnormal relative extension of rope or chain in the case of positive drive lifts according to 5.9.2.7;</i></p> <p>7) <i>Those for the detection of the slackening of ropes and / or chains according to 5.9.3.10;</i></p> <p>8) <i>Those mounted on pawl devices, according to 5.6.5;</i></p> <p>9) <i>Final limit switches, according to 5.12.2.</i></p>	
324 ES	5.12.1.6.1 c) & g)		ed	these two points can be combined as c) states the same as g) in the first sentence	delete point c) and leave only g)	
325 ES	5.12.1.6.1 d)	first sentence	te	Emergency electrical operation is frequently used as maintenance tool, sort of machine room inspection. Therefore, the required bypassing of electrical safety devices is not appropriate.	rephrase to:  The emergency electrical operation switch <b>shall</b> <b>is permitted to</b> render inoperative by itself or through another electric switch in conformity with	

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					5.11.2 the following electric devices:	
326 ES	5.12.1.6.1 d) 3)		te	We suspect there is no justification to bypass this safety device. It appears as unbalanced if the electric safety device of the UCMP is not mentioned in this list.	remove requirement	
327 ES	5.12.1.6.1 g)		te	<p><a href="#">See comment on 5.12.1.5.2.1 j)</a>                      This requirement does not comply with ESR 1.2.2 of the machinery directive:                      "Where there is more than one control position, the control system must be designed in such a way that the use of one of them precludes the use of the others, except for stop controls and emergency stops."                      MD-Guide:  <b>" §197 Multiple control positions</b>                      The requirements set out in the eighth paragraph of section 1.2.2 concerns machinery provided with two or more control positions intended to be used in turn, either by a single operator or by two or more operators, to carry out different tasks or control the machinery during different phases of its operation. In order to avoid confusion or contradictory commands, the control devices at each control position must be linked to the control system in such a way that the use of one control position precludes</p>	Ensure that the lift is blocked if more than one inspection control station or emergency electrical operation station is switched on.	

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				the use of the others, except for stop controls and emergency stops."		
328 ES	5.12.1.9		te	<p>Only independent information regarding the car door position is available and as such these requirements should only apply to car and landing doors that are coupled while in the unlocking zone.</p> <p>Additionally the contact and lock circuits should be checked periodically in a reliable manner and the car prevented from running so as to not cause an entrapment of users. The determination of correct information from car doors contacts, locks or interlocks and landing door contacts or interlocks can only reliably be done with it is known that the car door is fully open and there are coupled car and landing doors.</p>	<p>Revise as follows:</p> <p>5.12.1.9 Prevention of normal operation of the lift with faulty door contact circuits</p> <p>Means shall be provided to monitor the position of car doors <u>that are mechanically coupled with the landing doors</u> while the car is in the unlocking zone, in order to prevent normal operation of the car if:</p> <p>a) The car door is not closed, even if a car door contact is bypassed;</p> <p>b) The lock contact of the landing door is bypassed except during operations permitted in 5.12.1.4;</p> <p><u>and to prevent the power closing of the doors during normal operation if the car door is fully open and any of the following conditions exist:</u></p> <p><u>(1) the car door contact is closed or the portion of the circuit, incorporating this contact is bypassed</u> (2) <u>the landing door lock contact of the landing door that is coupled to the opened car door is closed or the portion of the circuit, incorporating this contact is bypassed</u></p> <p><u>(3) the car door contact and the landing door lock contact of the door that is coupled to the opened car door are closed, or the portions of</u></p>	

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					<u>the circuits incorporating these contacts are bypassed</u>	
329 ES	5.12.1.9		ed	<p>Two different terms are used: “faulty” and “bypassed”. It leads to confusion whether it is talking about the bypassed door contacts as per 5.12.1.8 or a different failure mode (faulty door contacts).</p> <p>By faulty, it is understood “shorted” door contacts.</p> <p>In the case of bypassed contacts (as per 5.12.1.8), 5.12.1.9 is redundant, already covered in 5.12.1.8.3 d) and f), so this part of 5.12.1.9 should be deleted.</p>	<p>Prevention of normal operation of the lift with faulty (<u>shorted</u>) door contact circuits</p> <p>Means shall be provided to monitor the position of car doors while the car is in the unlocking zone, in order to prevent normal operation of the car if:</p> <p>a) The car door is not closed, even if a car door contact is <u>shorted by means other than the ones described in 5.12.1.8</u>;</p> <p>b) The lock contact of the landing door is <u>shorted by means other than the ones described in 5.12.1.8</u> except during operations permitted in 5.12.1.4. <u>The signal described in 5.12.1.8.3 d) can be used.</u></p>	
330 ES	5.12.1.10		te	<p>Electrical anti-creep system</p> <p>When required by 5.6, an electrical anti-creep system shall be provided, which satisfies the following conditions:</p> <p>a) The car shall be dispatched automatically to the lowest landing within 15 min after the last</p>	<p>Add:</p> <p><u>A failure in the control system shall not prevent the return of the car to the lowest landing.</u></p>	

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				normal journey; ...		
331 ES	5.12.1.10		ed	The second sentence included under section b) should be separated under an additional section c) as it represents an additional condition.  Moreover, the content of the NOTE included at the end of the sub-clause is unclear. This seems to be a mistake, and in the proposed rephrasing the Note is eliminated.	The proposed rephrasing of the sub-clause is as follows: <b>"5.12.1.10 Electrical anti-creep device</b> <i>When required by 5.6, an electrical anti-creep system shall be provided which satisfies the following conditions:</i>  a) <i>The car shall be dispatched automatically to the lowest landing within 15 min after the last normal journey;</i>  b) <i>In the case of a lift provided with manually operated doors or with power operated doors where closing is carried out under the continuous control of the users, there shall be a notice in the car as follows "CLOSE DOORS". The minimum height of the characters shall be 50 mm.</i>  c) <i>There shall be an inscription on or near the main switch; "Switch off only when the car is at the lowest landing".</i>  <del>NOTE If the device takes power from the emergency lighting system, the system should</del>	

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					<i>still provide the required duration of power as defined by 5.4.10.4.</i>	
332 ES	5.12.1.11.1	c)	te	The term “inspection personnel” is used in 5.12.1.11.1 c). However are these not “authorized persons”?	Revise as follows: 5.12.1.11.1 c) On the car roof (5.4.8 b)), in an easily accessible position and no more than 1 m from the entry point for <del>inspection or maintenance personnel</del> authorized persons. This device may be the one located next to the inspection operation control if this is not placed more than 1 m from the access point;	
333 ES	5.12.1.11.2	last sentence	te	What is the justification for this constraint? Since this device is not intended to be an emergency stop switch, to be easy and fast actuated. This constraint seems to be arbitrary.  see also CEN interpretation no 121 and ISO 13850.	Remove last sentence  <b>5.12.1.11.2</b> The stopping devices shall consist of electric safety devices in conformity with <b>5.11.2</b> . They shall be bi-stable and such that a return to service cannot result from an involuntary action. <del>Button type devices according to EN 60947-5-5 shall be used as stopping device.</del>	
334 ES	5.12.1.7			Marking to be defined so it can be understood by every authorised user		

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335 ES	5.12.2.2		te	In this sub-clause related to the means of actuation of the final limit switches, there is no mention to the means of actuation for hydraulic <u>direct acting lifts</u> , and only provisions for indirect acting lifts are given. The requirements are those included in sub-clause 10.5.2.2 in EN 81-2. It is proposed to include the requirements for the hydraulic direct lifts as sub-clause 5.12.2.2.4 and to renumber the sub-clause for hydraulic indirect acting lifts as 5.12.2.2.5.	1 <sup>st</sup> Add the following sub-clause: <p>“ <b>5.12.2.2.4</b> <i>In the case of hydraulic direct acting lifts, actuation of the final limit switch shall be effected:</i></p> <p>a) <i>Either by the car or the ram, or</i></p> <p>b) <i>Indirectly by a device linked to the car, e.g. by a rope, belt or chain.</i></p> <p><i>In the case b), breakage of or slack in this linkage shall cause the machinery to stop by means of an electric safety device in conformity with 5.11.2”.</i></p> <p>2<sup>nd</sup> Renumber clause <b>5.12.2.2.4</b> as <b>5.12.2.2.5</b> and include in the first sentence “<b>hydraulic indirect acting lifts</b>”.</p>	
336 ES	5.12.2.3.2		te	Explicit reference must be made to hydraulic lifts.	Rephrase: <b>For hydraulic lifts</b> , after the operation of the final limit switches, car movement in response to car and landing calls only shall no longer be possible, even in the case of the car leaving the actuation zone by creeping.	
337	5.12.2.3.2			Replace "competent" by "authorised" (see definition)	The return to service of the lift shall require the intervention of a <del>competent</del> <u>authorised</u> person	

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**Comments and secretariat observations on "Safety rules for the construction and installation of lifts — Lifts for the transport of persons and goods — Part 20: Passenger and goods passenger lifts "**

Date: 2nd of April 2012	Document: Draft prEN 81-20:2011
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1	2	(3)	4	5	(6)	(7)
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338 ES	6.2	Table	ed	Table No is wrong (only page 130, other pages are correct) Table 13 - Means of verification of the ...	Correct table No Table <b>16</b> - Means of verification of the ...	
339 ES	6.2	Table 16	te	Following clauses of EN81-2 Annex D.2 should be kept o) limitation of the ram stroke ( <b>12.2.3</b> ) : verification that the ram is stopped with buffered effect ; p) full load pressure : measurement of the full load pressure ; q) pressure relief valve ( <b>12.5.3</b> ) : check of the correct adjustment	Integrate checks for verification of design given in former EN81-2 in Table 16	
340 ES	6.3.1	a)	ge	The word “retardation” is used.	We propose to use the word “deceleration” because it is more adequate for motion.	

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1	2	(3)	4	5	(6)	(7)
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341 ES	6.3.1 b)		te	Based on our comment on 5.9.2.2.2.1 the requirement has to be aligned accordingly,  and Clarify what is meant by the word “sufficient”	Proposed modification: a) Additionally it shall be verified by practical tests <del>or calculation</del> that where one brake set is not working a sufficient braking effort is exerted to <u>keep the car stationary or</u> decelerate the car, travelling downwards at rated speed and with <u>110 %</u> rated load (see <b>5.9.2.2.2.1</b> ).  <u>Sufficient is: In any case the max. buffer impact speed is not reached (including Slow down monitoring device).</u>	
342 ES	6.3.1 c)		ed		Merge this clause with 6.3.1 b)	
343 ES	6.3.3 b)			descending, with the car loaded with 110 % of the rated load, in the lower part of the travel;	<del>We insist to keep the old text</del> b) descending, with the car loaded with 125 % of the rated load, in the lower part of the travel;	

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344 ES	6.3.4		te	<p>The aim of the test before putting into service is to check the correct mounting, correct setting and the soundness of the complete assembly, comprising car, safety gear, guide rails and their fixing to the building.</p> <p>The requirement of the safety gear test has to be clear defined. Therefore the original text j) car safety gear (9.8) from EN81-1 shall be kept: <i>the energy which the safety gear is capable of absorbing at the moment of engagement will have been verified</i></p>	<p>j) car safety gear (9.8): <u>the energy which the safety gear is capable of absorbing at the moment of engagement will have been verified</u> in accordance with F.3. The aim of the test before putting into service is to check the correct mounting, correct setting and the soundness of the complete assembly, comprising car, safety gear, guide rails and their fixing to the building.</p>	
345 ES	6.3.4		te	<p>Type test for safety gears ensures a proper design as well as correct measures being initially implemented i.e. in the production or the logistic chain.</p> <p>But it does not cover mistakes during the order processing or the installation. A visual check only does not guarantee the aim of the first sentence of 6.3.4.</p>	<p>Clear acceptance criteria's shall be defined for the braking capability of the installed device (e.g. brake markings).</p>	
346 ES	6.3.6		ed	<p>Wrong reference to clause 5.6.3.6, should be 5.6.3.8</p>	<p>correct to 5.6.3.8</p>	

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347 ES	6.3.7	b)	ge	The word “retardation” is used.	We propose to use the word “deceleration” because it is more adequate for motion.	
348 ES	6.3.14		te	Examination test for “locking device” is missing!	Take of text from EN81-1/2 Annex D.2 a) and adjust the reference: <u>locking devices (7.7);</u>	
349 ES	6.3.15		te	Examination test for “electric safety device” is missing!	Take of text from EN81-1/2 Annex D.2 b): <u>electric safety devices (annex A);</u>	
350 ES	6.3.16		te	Examination test for “suspension elements and their attachments” is missing!	Take of text from EN81-1/2 Annex D.2 c) and adjust the reference: <u>suspension elements and their attachments: it shall be verified that their characteristics are those indicated in the register or file (16.2.a);</u>	
351 ES	6.3.17		te	The check of the final limit switch is missing!	Take of text from EN81-1/2 Annex D.2 g) and adjust the reference: <u>final limit switches (10.5);</u>	

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352 ES	6.3.18		te	Examination test for the “Overspeed Governor” is missing!	Take of text from EN81-1/2 Annex D.2 i) and adjust all references: <u>overspeed governor:</u> <u>1) the tripping speed of the overspeed governor shall be checked in the direction corresponding to the descent of the car (9.9.1 and 9.9.2) or the counterweight or the balancing weight™ (9.9.3);</u> <u>2) the operation of the stopping control laid down in 9.9.11.1 and 9.9.11.2 shall be checked in both directions of movement;</u>	
353 ES	7.1.1			Replace "competent" by "authorised" (see definition)	d) Events needing the intervention of a <del>competent</del> <u>authorised</u> person;	
354 ES	A	Table A.1	ge	The word “retardation” is used.	We propose to use the word “deceleration” because it is more adequate for motion.	
355 ES	D		ed	Wrong reference to clause 5.2.3 instead to 5.2.2 in title as well as figure description	correct to 5.2.2	

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356 ES	E	E.2 Last sentence	ed	We think in the following text the issue should be address to building designer and not to the building fabrication.  It is therefore important that the persons responsible for the fabrication of these supporting structures communicate with the lift provider in order to ensure that they are suitable under all load conditions.	for the <del>fabrication-</del> <u>design</u> of these	
357 ES	E	E.3.2 First sentence	ed	The comfort and safety of persons riding in the lift, working ...	Safety of person is priority 1, therefore the wording should be changed as following:  The <u>safety and comfort</u> of persons riding in the lift, working ...	
358 ES	Annex E, Building interfaces	E.3	te	This annex is informative, so the use of shall is not consistent.	To replace everywhere "shall" by " <b><u>should</u></b> "	
359 ES	E.3.2	5 <sup>th</sup> Para	Te	Grammatical error "...ventilation shall be granted."	Change to "...ventilation should be <u>ensured</u> ."	
360	E.3.2	6th	Ed	Grammatical error "In particular also attention shall be"	Change to " <u>Particular attention should also be</u> "	

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361 ES	G	Table G.2	ed	Mistake in title Correlation between prEN 81-20:2011 and EN 81-1:1998+A3 and EN 81-1:1998+A3 in the order of prEN 81-20:2011 sequence	Correct title Correlation between prEN 81-20:2011 and EN 81-1:1998+A3 and EN <b>81-2</b> :1998+A3 in the order of prEN 81-20:2011 sequence	
362 ES	G	Table G.3	ed	Correlation between prEN 81-50:2011 and EN 81-1:1998+A3 and EN 81-1:1998+A3 in the order of prEN 81-50:2011 sequence	Correct title Correlation between prEN 81-50:2011 and EN 81-1:1998+A3 and EN <b>81-2</b> :1998+A3 in the order of prEN 81-50:2011 sequence	
363 ES	G	Table G.3 clause 4	ed	Marking wrong „List of significant hazards“ is marked as „deleted“ , the making should be placed in the column for “New”	Set marking in column “New”	
364 ES	H (new)		ed	<b>Annex L (from EN81-1 is missing)</b> (normative) Necessary buffer stroke	Add former Annex L in new Annex H	

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365 ES	Bibliography		ed	Reference to “Guide 14 Child Safety Guidance for its Inclusion in Standards” is missing	Add new reference to: CEN/CENELEC Guide 14 Child Safety Guidance for its Inclusion in Standards	
366 ES	Bibliography		ed	Reference to “CEN/CENELEC Guide 6 Guidelines for standards developers to address the needs of elderly persons and persons with disabilities” is missing	Add new reference to: CEN/CENELEC Guide 6 Guidelines for standards developers to address the needs of elderly persons and persons with disabilities	

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