Subject: Independence of Normal Terminal Stopping Devices (NTSD) and Normal Stopping Means (NSM)

Applicable to: A17.1-2010 / B44-10 requirement 2.25.2 and Inquiry 11-2229

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1. **Background**

1.1 With the adoption of the 2010 code effective for submissions received on or after May 1, 2012, TSSA began enforcement of requirement 2.25.2 through the design submission and engineering review process. Since that date, if controls where observed to have non-conformances or if compliance was not clearly conveyed in the design submission TSSA permitted conditional registrations if a commitment for conformance was received from the submitter.

In parallel with TSSA engineering enforcement of requirement 2.25.2, an interpretation was sought from A17.1 on the requirements related to independence of NTSD and NSM. The outcome of this inquiry resulted in the release of Interpretation Bulletin 258/12 that was first circulated amongst industry in Dec 2012 as further awareness to our 2010 Code enforcement activities.

The content of Bulletin 258/12 - posted to the TSSA web site on July 2, 2013- is consistent with TSSA engineering enforcement activities which began 14 months prior, and aligns with those requirements that where communicated to control manufacturers during the design review process.

2. **Enforcement**

2.1 The current state of conformance to requirement 2.25.2 for A17.1-2010 / B44-10 installations is varied, with a number of projects requesting conditional registrations to prevent project stoppages while upgrades were being developed or planned for retrofit.

2.2 To facilitate the transition to fully compliant controls designs (as interpreted in 258/12) TSSA is revising its enforcement dates as follows:

   a) All submissions received after **July 2, 2013** must be in full compliance to 2.25.2 at time of registration or must be retrofitted not later than **March 1, 2014**.

   b) Submissions received prior to July 2, 2013, that carried a requirement to comply with 2.25.2 will be permitted to remain as installed, effectively implying that no upgrade actions for 2.25.2 independence will be required and existing engineering orders retracted if issued prior to this date.

2.3 TSSA continues to work with control manufacturers to review equipment conformance to 2.25.2. Where control designs have been submitted that demonstrate compliance through proposed upgrades TSSA will continue to conditionally register and release submissions.

2.4 Where manufacturers are still developing solutions, or where documentation has not been provided to adequately demonstrate compliance, TSSA will continue to permit conditional registrations (upon request) – but only until **January 1, 2014**. If conformance is not demonstrated by **January 1, 2014**, TSSA will not register the design.

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Rob Kremer, P.Eng.
Manager of Engineering, Elevating and Amusement Devices safety Program