

Canadian Standards Association Etobicoke, Ontario **To the Part I Committee**

Subject No. 3061	Chair: D. McColl	Date: December 2, 2003
Title: Numbering of Rules, Section 38		

Submitted by: A.Z. Tsisserev of The City of Vancouver, British Columbia on March 28, 2002

Proposal: Revise numbering system of all rules in Section 38 so as to establish only even numbers similar to the numbering system adopted throughout the Code.

Reasons for Request: During our deliberations on Section 38, the Committee members expressed great concerns in respect to the numbering of Rules covered by this Section. They strongly felt that the deviation from the accepted numbering system may lead to a deterioration of one of the best Canadian National Standard, and the odd numbers should only be used for new rules required by interim revisions (see page xxix, General Arrangements of the CEC, Part I, 19th Edition).

Chair's Comments: I will repeat here some of the rationale from Subject No. 2566, the rewrite of Section 38, which was approved last June for inclusion in the CEC Part1, 2002 Edition:

Harmonization with NEC. In order to continue to facilitate international trade and common elevator electrical standards and practises between Canada and the United States, this proposal is intended to harmonize the content, the numbering and the language of the CSA Standard C22.1-98 Canadian Electrical Code Part 1 ("CEC") Section 38 with ANSI/NFPA 70-2002 National Electrical Code ("NEC") Article 620 to the maximum possible extent.

- *Rationale 1* - *Common Requirements.* Proposals are written to harmonize the technical requirements of the CEC with those of NEC to the maximum extent possible. Many technical requirements are already identical or similar in intent.

- *Rationale 2* - *Common Numbering. To permit ready comparison with NEC Article 620, proposals are written to renumber each clause keeping suffixes common, so that for example NEC Article 620-XXX becomes CEC 38-XXX. See also Table.*

Prior to balloting at the Part 1 Committee, approval was obtained by the previous Section 38 Chair to deviate from the standard numbering system.

To revise the numbering now to the standard numbering system would defeat one of the significant goals in our harmonization with Article 620 of the NEC.

Section 38 is a unique section of Part 1, used primarily by members of the elevator industry and Elevating Device Regulatory Authorities, not Electrical Regulatory Authorities. The benefits of a harmonized Section 38 and the NEC numbering outweigh the numbering inconsistency.

I recommend that the proposal not be accepted and that the subject be closed.

Subcommittee Deliberation: The Section 38 members who responded unanimously agreed with the Chair's recommendation to close this subject for the reasons shown in the Chair's Comments.

Subcommittee Recommendation: To close the subject.