

Otis Elevator Company
Otis Service Center
212 West Newberry Road
Bloomfield, Connecticut 06002

**Otis**

A United Technologies Company

October, 25, 2011

Mr. Lawrence Taylor
Chief Elevator Inspector
Texas Department of Licensing and Regulation
P. O. Box 12157
Austin, Texas 78711

Re: Texas Regulation Administrative Rules, Chapter 74, Section 74.75(a)(2)

Dear Mr. Taylor;

Periodic Tests described in A17.2 sections 8.12 and 10.12 can be performed with the removal of 4 to 7 steps or pallets on Escalators or Moving Walks manufactured by Otis Elevator Company. We respectfully request that this information is considered as it applies to the enforcement of Escalator and Moving Walk inspections in the State of Texas.

Please feel free to contact me at your convenience for any additional information supporting this request.

Yours truly,

Craig A. Buckley
Manager, National Field Engineering
PH 860-286-4556
eFX 860-353-0053
Craig.buckley@otis.com