



UNITED STATES
CONSUMER PRODUCT SAFETY COMMISSION
4330 EAST WEST HIGHWAY
BETHESDA, MD 20814

This document has been electronically
approved and signed.

BALLOT VOTE SHEET

Date: July 5, 2017

TO : The Commission
Todd A. Stevenson, Secretary

THROUGH: Patricia A. Adkins, Executive Director
Mary T. Boyle, General Counsel

FROM : Patricia M. Pollitzer, Assistant General Counsel
David M. DiMatteo, Attorney, OGC

SUBJECT : Automatic Residential Garage Door Operators; Revision of the Underwriters
Laboratories, Inc.'s "Standard for Safety for Door, Drapery, Gate, Louver, and
Window Operators and Systems," UL 325

BALLOT VOTE DUE: Tuesday, July 11, 2017

Staff is forwarding to the Commission a memorandum recommending that the Commission allow recent changes to entrapment protection provisions in Underwriters Laboratories, Inc.'s (UL) "Standard for Safety for Door, Drapery, Gate, Louver, and Window Operators and Systems," also known as UL 325, to be incorporated into the Commission's automatic residential garage door operator (GDO) standard. On June 16, 2017 the Commission received notification from UL of revisions to UL 325.

Public Law 101-608 mandated that the entrapment protection provisions of UL 325 be considered a consumer product safety rule. The statute further provides that if UL revises UL 325, then UL must notify the CPSC and "the revision shall be incorporated in the consumer product safety rule . . . unless, within 30 days of such notice, the Commission notifies the Laboratories that the Commission has determined that such revision does not carry out the purposes of [the original entrapment protection requirements]."

Staff recommends that the Commission allow the entrapment protection revisions to be incorporated into the consumer product safety rule. Should the Commission concur with staff's recommendation, the Office of Hazard Identification and Reduction will work with the Office of the General Counsel on a draft notice of proposed rulemaking (NPR) that will include the UL revisions under consideration here as well as the revisions to UL 325 that the Commission approved on January 18, 2017.

Please indicate your vote on the following options:

- I. Approve staff's recommendation to allow the revisions to UL 325 to be included in the Commission's GDO standard.

Signature

Date

- II. Do not approve staff's recommendation to allow the revisions to UL 325 to be included in the Commission's GDO standard.

Signature

Date

- III. Take other action (please specify):

Signature

Date

Attachment: CPSC Staff Memorandum titled, "Revision of Residential Garage Door Operator Standard, 16 C.F.R. part 1211"



UNITED STATES
CONSUMER PRODUCT SAFETY COMMISSION
4330 EAST WEST HIGHWAY
BETHESDA, MD 20814

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Memorandum

Date: July 5, 2017

TO : The Commission
Todd Stevenson, Secretary

THROUGH: Patricia H. Adkins, Executive Director
Mary T. Boyle, General Counsel

FROM : George A. Borlase, Ph.D., P.E., Assistant Executive Director,
Office of Hazard Identification and Reduction

Vincent Amodeo, Mechanical Engineer
Directorate for Engineering Sciences

SUBJECT : Revision of residential garage door operator standard, 16 C.F.R. part 1211

Introduction

This memorandum informs the Commission that Underwriters Laboratories Inc. (UL) recently revised UL's voluntary standard titled, "Standard for Safety for Door, Drapery, Gate, Louver, and Window Operators and Systems," also known as UL 325, seventh edition. As explained below, the Commission has a mandatory standard for automatic residential garage door operators (GDOs) to protect against entrapment. 16 C.F.R. part 1211. The relevant statute provides that when UL revises the entrapment protection provisions of UL 325, UL must notify the Commission, and unless the Commission makes a determination within 30 days that the revision does not carry out the purposes of the original entrapment protection requirements, UL's revision is included in the Commission's mandatory standard. For the reasons discussed below, staff recommends that the Commission allow the recent revisions to become part of the Commission's mandatory GDO standard.

Discussion

The Consumer Product Safety Improvement Act of 1990 (Improvement Act) mandated that all automatic residential GDOs conform to the entrapment protection requirements of UL 325. In response to this mandate, the Commission issued the safety standard for automatic residential GDOs (16 C.F.R. part 1211) on June 19, 1991. The Improvement Act provides that when UL makes changes to the entrapment protection provisions of UL 325, UL must notify the Commission of proposed revisions. UL's changes must be incorporated into 16 C.F.R. part 1211, unless the agency notifies UL within 30 days that the Commission has determined that the revisions do not carry out the purposes of the Improvement Act. The purpose of the Improvement Act is to protect children from becoming entrapped by garage doors.

In January 2017, the Commission approved staff's recommendations to incorporate two changes into the mandatory product safety standard for automatic residential GDOs at 16 C.F.R. part

1211, based on revisions to the sixth edition of UL 325 that were published in December 2016. The GDO mandatory rule codified text has not yet been updated to reflect the Commission approved changes.

On June 16, 2017, UL notified the Commission that UL published additional revisions to UL 325 sixth edition on May 19, 2017, as the seventh edition (Letter attached). Should the Commission find that the revisions do not achieve the purposes of the Improvement Act the Commission must notify UL before July 16, 2017 to prevent the changes from being incorporated into 16 C.F.R. part 1211.

The May 2017 revisions comprise seven changes to UL 325 sixth edition. The seven changes are listed in Appendix A.¹ Commission staff reviewed these changes.

Commission staff determined that one of the changes does not affect 16 C.F.R. part 1211 because it is a change to internal cabling requirements, which are not covered by the Commission's mandatory residential GDO safety standard. In addition, one of the changes added a number of non-technical provisions, including metric measurements, French translations, and references to appropriate related U.S. and Canadian standards and codes, which are not germane to the Commission's mandatory GDO safety standard.

The five remaining revised requirements (summarized below²) are relevant to the mandatory residential GDO standard.

1. *Clarifications to improve the uniform implementation and interpretation of the Standard.*
Clarifies that external edge sensors shall operate as required when tested per the expanded external edge sensor test requirements and they shall comply with the applicable normal operation test. The revision expands the edge sensor test requirements for GDOs to specify specific requirements based on the GDO type; for example: sectional door vs. one piece door and horizontally moving door vs. vertically moving door. The revision adds figures to illustrate the test procedures for each type of GDO. The revision clarifies that the edge sensor endurance test shall be conducted at room temperature.
3. *Unattended visual alarm flash rate.*
Clarifies the visual alarm flash rate during unattended operation of the GDO.
4. *Clarification of temperature for resistance to impact test for external entrapment protection device.*
Clarifies that an external protection device using polymeric or elastomeric material shall meet the specified impact test requirements and remain fully operational at room temperature.
5. *Revision to resistance to impact test for external entrapment protection device.*

¹ Standard for Door, Drapery, Gate, Louver, and Window Operators and Systems, UL 325, can be obtained from Underwriters Laboratories, Inc., 333 Pfingsten Road, Northbrook, IL 60062, tele 847.272.8800, www.UL.com.

² Line item numbers correspond to UL 325 revision changes outlined in Appendix A.

Adds an exception for polymeric or elastomeric materials that crack or break during the impact test to be acceptable if they pass the water exposure test in the damaged condition.

6. *Editorial changes.*

Clarifies that the means for connection of an external secondary entrapment protection device shall be applicable to the vertically moving or horizontally moving GDO. Clarifies that for horizontally sliding GDOs, the GDO is not required to open the door a minimum of 2 in when the GDO senses a second obstruction during the *reversing* travel.

Staff Recommendation

Staff recommends that the Commission allow the most recent entrapment protection changes to UL 325 sixth edition to be incorporated into the mandatory product safety standard for automatic residential GDOs at 16 C.F.R. part 1211. Staff believes that the various revisions improve the level of safety afforded by the mandatory standard by clarifying how to conduct tests and by expanding test requirements to cover types of GDOs currently on the market. These changes will further reduce the risk of child entrapment under garage doors, and thus, advance the purposes of the Improvement Act. Should the Commission conclude that incorporation of the May 2017 UL 325 revisions into the mandatory standard is appropriate, technical staff will work with the Office of the General Counsel to prepare a draft Federal Register (FR) notice revising part 1211 to include the December 2016 UL 325 revisions already approved by the Commission for incorporation, in addition to the new May 2017 UL 325 requirements Staff will then forward the FR notice to the Commission for a vote.

Appendix A

UL Standard for Safety for Door, Drapery, Gate, Louver, and Window Operators and Systems, UL 325, Seventh Edition, Dated May 19, 2017

Summary of Topics

The revisions dated May 19, 2017 were issued to incorporate the following changes in requirements (*Revisions that effect GDO entrapment protection are in bold*):

- 1. Clarifications to improve the uniform implementation and interpretation of the Standard.**
2. Instructions for cord/cable type for connection of accessories.
- 3. Unattended visual alarm flash rate.**
- 4. Clarification of temperature for resistance to impact test for external entrapment protection device.**
- 5. Revision to resistance to impact test for external entrapment protection device.**
- 6. Editorial changes.**
7. The adoption of ANSI/CAN/UL 325 as a binational US/Canadian Standard.



June 16, 2017

U.S. Consumer Product Safety Commission
Mr. Todd Stevenson
Office of the Secretary
4330 East-West Highway
Bethesda, MD 20814

Subject: UL 325 - Published Revisions

Dear Mr. Stevenson,

In accordance with Public Law 101-608, Underwriters Laboratories Inc. hereby notifies the CPSC regarding published revisions to the sixth edition of the Standard for Door, Drapery, Gate, Louver, and Window Operators and Systems, UL 325.

On March 10, 2017 UL proposed revisions to the residential garage door operator portion of UL 325. Ballots and comments to these proposed revisions were due April 25, 2017. No additional changes were made to the proposal, and revisions were published May 19, 2017, as the seventh edition.

Attached is a copy of the published seventh edition of UL 325. If you have any questions, please feel free to contact me.

Yours truly,

Reviewed by:

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