

Ballot Vote Sheet

TO: The Commission
Alberta E. Mills, Secretary

THROUGH: Austin C. Schlick, General Counsel
Jason K. Levine, Executive Director

FROM: Daniel R. Vice, Assistant General Counsel,
Regulatory Affairs
David M. DiMatteo, Attorney, Regulatory Affairs

SUBJECT: Residential Garage Door Operators: Revision of UL Standards & Engagement:
Standard for Safety for Door, Drapery, Gate, Louver, and Window Operators
and Systems, ANSI/CAN/UL 325:2023

DATE: June 7, 2023

BALLOT VOTE DUE: Tuesday, June 13, 2023

Staff is forwarding to the Commission a memorandum recommending that the Commission allow incorporation, into the Commission's automatic residential garage door operator standard, of revisions to the garage door entrapment protection provisions in UL Standards & Engagement (ULSE) Standard for Safety for Door, Drapery, Gate, Louver, and Window Operators and Systems, also known as ANSI/CAN/UL 325:2023 (UL 325).

In 1990, section 203 of Public Law 101-608 mandated that the garage door entrapment protection provisions of UL 325 be considered a consumer product safety rule.¹ The statute further provides that if ULSE revises UL 325, then ULSE must notify the CPSC and "the proposed 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]." ULSE notified the Commission of various revisions to UL 325 on May 19, 2023, and 30 days after that date is June 18, 2023.²

Staff recommends that the Commission allow specific entrapment protection revisions to UL 325 to be incorporated into the mandatory consumer product safety rule. Should the Commission

¹ 15 U.S.C. 2056 Note.

² Because the statutory notification deadline of June 18 is a Sunday, OGC recommends that the Commission determine before Friday, June 16, 2023, whether to allow the revisions to take effect.



Ballot Vote Sheet

concur with staff's recommendation, staff will prepare a draft direct final rule that will include the specific ULSE revisions in the mandatory standard, 16 C.F.R. part 1211.

Please indicate your vote on the following options:

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

Signature Date

- II. Do not approve staff's recommendation to allow certain 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, Revision of Residential Garage Door Operator Standard, 16 C.F.R. Part 1211.



Memorandum

TO: The Commission
Alberta E. Mills, Secretary

June 6, 2023

THROUGH: Austin C. Schlick, General Counsel

Jason K. Levine, Executive Director

DeWane Ray, Deputy Executive Director for Operations

FROM: Duane Boniface, Assistant Executive Director
Office of Hazard Identification and Reduction

Jay Kadiwala, Electrical Engineer
Directorate for Engineering Sciences

SUBJECT: Revision to Mandatory Standard for Residential Garage Door
Operators, 16 C.F.R. Part 1211

Introduction

The Consumer Product Safety Improvement Act of 1990 (Improvement Act) mandated that all automatic residential garage door operators (GDOs) conform to the entrapment protection requirements of ANSI/CAN/UL 325 (Third Edition) - *Standard for Safety for Door, Drapery, Gate, Louver, and Window Operators and Systems*, (UL 325). 15 U.S.C. § 2056 (Notes) (attached at Appendix D).

In response to this statutory mandate, the Commission issued the safety standard for automatic residential GDOs based on the UL 325 entrapment protection requirements (Safety Standard for Automatic Residential Garage Door Operators, 16 C.F.R. part 1211) on June 19, 1991. When UL Standards & Engagement (ULSE) publishes adopted changes to the entrapment protection provisions of UL 325 for residential garage door operators, the Improvement Act requires ULSE to notify the Commission of the relevant proposed revisions. Improvement Act, § 203(c). ULSE's changes must be incorporated into part 1211, unless the Commission notifies ULSE within 30 days that the Commission has determined that the revisions do not carry out the purposes of section

**U.S. Consumer Product
Safety Commission**
4330 East-West Highway
Bethesda, MD 20814
cpsc.gov

**National Product Testing
& Evaluation Center**
5 Research Place
Rockville, MD 20850

*This memorandum was prepared by the CPSC staff. It has not been reviewed
or approved by, and may not necessarily reflect the views of, the Commission.*

203(b) of the Improvement Act, which is to prevent entrapment by residential garage doors controlled by an automatic garage door operator. 15 U.S.C. § 2056(c), Note.

On May 19, 2023, UL Standards & Engagement, Inc. (ULSE) provided official notification to the Commission that ULSE published revisions to UL 325, Seventh Edition on February 21, 2023, (attached at Appendix E). This notice also stated that ULSE published prior revisions on July 19, 2019, and February 28, 2020, but that ULSE did not inform the Commission of these revisions. This memorandum provides staff's assessment of the changes to the sections of UL 325 that are relevant to the residential garage door operator entrapment protection requirements and how those changes impact the purpose of the Improvement Act. The Commission must notify ULSE before June 16, 2023, if the Commission determines the applicable changes to UL 325 are not being incorporated into 16 C.F.R. part 1211 because they do not carry out the purpose of the Improvement Act.

While UL 325 includes provisions relating to residential garage door entrapment, it also contains provisions that concern other products such as gates and window operators. Section 203(c) of the Improvement Act only requires the Commission to evaluate changes to UL 325 that relate to residential garage door entrapment. Staff has assessed that the February 21, 2023, revision contains two changes concerning residential garage door entrapment provisions and recommends that the Commission incorporate these changes into CPSC's mandatory standard.

The February 28, 2020, revision of which CPSC was not formally notified contained no substantive changes concerning residential garage door entrapment. The July 19, 2019, revision, of which CPSC also was not notified, does contain changes to UL 325 residential garage door entrapment requirements. Because ULSE has only now notified the Commission of these changes, pursuant to Improvement Act section 203(c), staff has now evaluated whether the Commission should incorporate these changes into part 1211.

For the reasons discussed below, staff recommends that the Commission allow the applicable revisions to UL 325 published July 19, 2019, and February 21, 2023, to become part of the mandatory GDO Standard because they improve safety.

Discussion

February 21, 2023, UL 325 revisions:

The February 21, 2023, revisions to UL 325 mostly are related to gates used in residential use applications, French-language translations, and references to related U.S. and Canadian standards and codes (see Appendix C), all of which are not within the scope of 16 C.F.R. part 1211. There is one change that will impact CPSC's regulation with respect to a sensitivity test for B1 type photoelectric sensors used in residential garage doors. A "B1" type sensor is a non-contact sensor (photoelectric sensor or the equivalent) as described in Table 32.1 of UL 325. Cl. 37.3.2 is within the scope of the regulation because for the sensitivity test, it has changed the phrase "floor" with "level surface below the door [or gate]." Since this phrase broadens the surface that could be below the door, such as a level testing surface, it captures other possible surfaces besides a floor which should be level for testing purposes. These broadening increases safety because it addresses more scenarios besides a floor (such as a level testing surface), where an entrapment hazard may be possible.

Finally, in Cl. 37.3.2 the sentence “The photoelectric sensor is to be mounted at the highest position as recommended by the manufacturer” has been removed. This removal is not a reduction in safety because Cl. 37.3.2 continues to reference Cl. 37.3.1, which in turn references Cl. 35.1.1-35.1.4 for test heights. Cl. 35.1.3 contains the requirements for test height, including mounting at the highest position recommended by the manufacturer, making the removed sentence redundant. As such, removing this sentence results in one requirement for test heights identified, which may reduce confusion and potentially increases the likelihood for compliance.

February 28, 2020, UL 325 revisions:

This published revision includes five changes to UL 325, but only one relates to requirements in part 1211 (see Appendix B). The change is an addition of a note at the beginning of Section 34 (codified in 16 C.F.R. § 1211.15) indicating that requirements in Section 34 only apply to rigid one-piece overhead doors and door operators when they are sold as a system. This is only a clarification of Section 34’s current scope and does not modify any of the requirements in Section 34. Therefore, the February 28, 2020, revisions do not require any change to CPSC’s mandatory standard. Therefore, staff does not recommend any Commission action on the immaterial changes first published in the February 28, 2020, UL 325 revision.

July 19, 2019, UL 325 revisions:

The July 19, 2019, revisions to UL 325 include four additions which are applicable to the entrapment requirements for automatic residential garage door operators in 16 C.F.R. part 1211. The remaining revisions to UL 325 currently were not applicable to GDOs; see Appendix A for a list of all the changes.

1. ANSI/CAN/UL 325:2019, Cl. 39 discusses edge sensors, which detect force that the door applies in a potential entrapment condition. The purpose of this normal operation test is to make sure the door edge sensor operates properly under normal use conditions. The test is conducted by applying a specified force as described in Cl. 39.1.1.1. In Cl. 39.1.1.1 the normal operation test condition force for door edge sensors used in residential garage doors was changed from the previous requirement of 66.7 N (15 lbf) or less, to the new requirement of 66.7 N (15 lbf) **or greater**. This is a substantive change to how the endurance test is performed. The prior requirement for the endurance test was to apply the same force [66.7 N (15 lbf) or less] as the normal operation test also for the 30,000 endurance test cycles. The new requirement is to apply 66.7 N (15 lbf) or less for the normal operation test and then for the endurance test, to apply 66.7 N *or greater* for the 30,000 endurance test cycles. The applied test force for the endurance test is intended to stress the sensor more than the previous requirement did, and thus is more stringent. Technical staff concludes that this revision to the standard is an improvement to safety when compared to previous requirements and should be adopted into the regulation for residential garage door operators, 16 C.F.R. Part 1211.12(b).

In ANSI/CAN/UL 325:2019, Cl. 39.1.1.1, the following sentence was modified as follows: “An edge sensor, when installed on a representative door or gate, shall actuate upon the application of a 15 lbf (66.7 N) or less force in the direction of the application when tested at room

temperature 25°C ±2°C (77°F ±3.6°F). Additionally, when intended for use when exposed to outdoor temperature, shall actuate at 40 lbf (177.9 N) or less force when tested at -35°C ±2°C (-31°F ±3.6°F)." This is a substantive improvement, adding an additional normal operation test if a garage door operator is exposed to outdoor temperatures. In the prior version, this requirement only applied to edge sensors on gate operators. Technical staff concludes that this revision to the standard improves safety over the previous requirements because it addresses residential garage door operator functionality and safety at outdoor temperatures. As such, staff recommends that this revision be adopted into the regulation for residential garage door operators, 16 C.F.R. Part 1211.12(a)(4)(i).

2. The third change, to ANSI/CAN/UL 325:2019, Cl. 39.2, adds the sentence "All intended uses are to be tested." Prior to this revision, this requirement may have been understood implicitly but now, the standard makes it explicit that all intended uses must be tested rather than the test being performed for one intended use with presumably the least stringent requirements. This revision improves safety because it clarifies that all intended uses must be tested. Since edge sensors are used on gates and a variety of garage door constructions (e.g., sectional, one-piece), this phrase clarifies that a sensor must be tested for each intended use. This is a substantive change. As such, technical staff concludes that this standard revision is a safety improvement because it clarifies how the edge sensors are to be evaluated.
3. The fourth change adds the sentence "After the 30,000-cycle endurance test, the normal operation test shall be repeated." to Cl. 39.2. This appears to be a clarification, specifying how the certifier shall verify that the edge sensor has not failed after the 30,000 endurance cycles, as required by Cl. 39.2. The purpose of this change is to confirm that after the simulated life of the product as characterized by 30,000 endurance test cycles, the normal operation test will be performed again to make sure that the operator functions as intended. Once the sensor has been stressed for 30,000 endurance cycles, the edge sensor must function upon application of 66.7 N (15 lbf) or less just like it did when the product was new (before 30,000 endurance cycles on the edge sensor). This revision improves safety because the new requirement assesses proper sensor operation even after the simulated life of the product. Reliance on proper sensor operation is essential for protecting persons from the hazard of entrapment. Staff concludes that this change is a safety improvement and should be adopted into 16 C.F.R. part 1211.

Therefore, staff recommends that the Commission should allow these four July 19, 2019, revisions to UL 325 to become part of the mandatory GDO Standard 16 C.F.R. part 1211 because the revisions improve safety in furtherance of the purpose of the Improvement Act.

Conclusion & Technical Staff Recommendation:

As noted above, staff recommends that the Commission allow the revisions to 39.2 of the July 19, 2019, version of the UL 325, Seventh Edition, to be incorporated into the mandatory product safety standard for automatic residential GDOs at 16 C.F.R. part 1211. Staff also recommends the revisions of 37.3.2 of the February 21, 2023, version of UL 325, Seventh Edition, be incorporated into the mandatory standard.

Staff determined that the July 19, 2019, revisions and the February 21, 2023, revisions improve the level of safety afforded by the mandatory standard. These changes will further reduce the risk of entrapment under garage doors, and thus, carry out the purpose of the Improvement Act. Staff does not recommend any action related to the revisions to UL 325 dated February 28, 2020, to become part of the mandatory GDO Standard because they are either not applicable to requirements in part 1211 or not substantive.

If the Commission concludes the incorporation of the July 19, 2019, revisions and the February 21, 2023, revisions to UL 325 into the mandatory standard is appropriate, technical staff will work with the Office of the General Counsel to prepare for Commission consideration a draft *Federal Register* Notice revising 16 C.F.R. part 1211 to include the July 19, 2019, and February 21, 2023, revisions.

Appendix A: Summary of Topics included in UL 325, Revision published July 19, 2019

The revisions of ANSI/CAN/UL 325 dated July 19, 2019, were issued to incorporate the following changes in requirements (*Revisions related to GDO entrapment protection provisions are in **bold***):

1. Subsection 13.9 - Direct Plug-In Devices added under Section 13 - Power Supply Connections, along with Supplement SB – Requirements for Direct Plug-in Devices.
This revision applies to direct plug-in type devices which generally would not include residential garage door operators, as these devices are permanently wired or provided with a power supply cord; two connection types not in the scope of Cl. 13.9. Supplement SB requires additional requirements for electrical wiring for direct plug-in devices. This does not include electrical connections used in residential garage door operators.
2. Under the Section 15 – Internal Wiring, Clause 15.4.1 which prohibited use of Type AF and CF wire was deleted, and editorial revisions were made to Clause 15.1.5. Cl. 15.4.1 prohibited the use of Type AF and CF wiring which was deleted. This deletion does not change the meaning of the standard since these were prohibited previously. Cl. 15 is not a clause that is incorporated by reference in the regulation and therefore does not affect the regulation.
3. Revision to the vehicular barrier arm manual release exception in Section 32
This revision is for a vehicular barrier arm which is not a door. Additionally, there is no pinch point that results in an entrapment condition. Therefore, this revision is outside of the scope of the GDO regulation.
4. Revision to the vehicular barrier arm pendulum support requirements
This revision is also for a vehicular barrier arm which is not a door. Therefore, this revision is not applicable to residential garage door operators.
5. **Outdoor Use Clarification of Edge Sensor Testing; 39.1.1.1**
This revision is applicable to residential garage door operators because these products can be exposed to outdoor temperatures. This exposure means residential garage door operators would need to be tested with the edge sensor subjected to 177.9 N (40 lbf) at a test temperature of - 35°C ± 2°C during the normal operation test.
6. **Edge Sensor Endurance Test Force Clarification; 39.2.1**
This revision is applicable to residential garage door operators because the force at which the edge sensor used in a residential garage door operated that is stressed, has changed to 66.7 N (15 lbf) or greater.
7. Added Sections 41A (for U.S.) and 41B (for Canada) to include requirements for laser safety in accordance with CFR Title 21, Part 1040 and Consolidated Regulations of Canada (C.R.C.) c.1370 Radiation Emitting Devices Regulations, respectively.
This revision is not applicable to residential garage door operators because protection against the laser radiation hazard is not one of the intended purposes of the regulation protecting against entrapment.
8. Revision to Cl. 60.8.4 (j)(6) regarding swing gate entrapment zone definition and instruction

This revision is not applicable to residential garage door operators because it covers installation instructions for gate operators which are not residential garage door operators.

Appendix B: Summary of Topics included in UL 325, Revision published February 28, 2020.

The revision of ANSI/CAN/UL 325 dated February 28, 2020, includes the following changes in requirements:

1. Clarification of Section 34
This revision added a note at the beginning of the Section that this section covers a door operator and door sold as a system. This requirement does not change any other entrapment provisions about residential garage door operators. Since this note is not a requirement, it does not impact the safety of residential garage door operators.
2. Alternate Leakage Current Measurement Method Using UL 101; 42.1.1, Section 43, Table A.1
This revision changes the method for measuring leakage or touch current of the residential garage door operator. This does not impact the hazard of entrapment and therefore is out of scope of the regulation for residential garage door operators. Note that the leakage current requirement is not changing, only the method of measuring the leakage current, either conducting the test in UL 325, or using UL 101 test method.
3. Additional Warning Placards for Horizontally Moving Commercial Door Operators; 62.2.1, Figure 62.1
This revision and figure reference is for commercial door operators, which are out of scope of the regulation for residential garage door operators.
4. Tubular Drive Markings – Requirement for Location of Markings; 63.1.4, 63.3.12
These revisions are for product markings for drapery, shutters, awnings, blinds, and window coverings, not residential garage door operators.
5. Proposed Change to 60.8.4¹ b) Regarding Pedestrian Access; 60.8.4
This revision is for gates used for vehicles, which are out of scope of the regulation for residential garage door operators.

¹ In the body of the Standard, this revision was worded as “proposed change” but this revision was affirmatively adopted into the Standard by the consensus Technical Committee for the Standard. Therefore, this proposed change has been adopted into ANSI/CAN/UL 325, 7th Edition with revisions February 28, 2020.

Appendix C: Summary of Topics for UL 325, Revisions February 21, 2023.

UL Standard for Safety for Door, Drapery, Gate, Louver, and Window Operators and Systems, UL 325, Seventh Edition, Dated May 19, 2017, Revised February 21, 2023.

Summary of Topics The revisions dated February 21, 2023, were issued to incorporate the following changes in requirements (*Revisions that effect GDO entrapment protection is in bold*):

1. Revision of the Glossary Definition of Entrapment to Change “Object” to “Person” is Caught; 4.8
This revision defines that entrapment is intended to protect persons, not objects. This revision does not impact residential GDOs because this clause is not incorporated by reference in 16 C.F.R. part 1211.
2. Bifold Gates; 4.34A, Figure 4.1, 4.34B, Figure 4.2, 26.11, Table 32.1, Table 32.2, 32.1.24A, 32.2.1.1, 32.2.1.3, Section 32.2.5, 37.2.3, 39.1.1.1, 39.1.1.2, Figure 39.7, 39.1.3.1, Figure 39.10, Figure 39.11, 60.8.4, Table *B.1*
This revision impacts gates. Gates are not doors and therefore are not within the scope of the residential garage door operators.
3. Reference Corrections to Include Vehicular Gate Operators; 17.1, 46.2.1
This revision impacts gates. Gates are not doors and therefore not within the scope of residential garage door operators.
4. **Type B1 Test Clarification**; 32.1.7, 32.2.1.2, **37.3.2**
This revision impacts entrapment protection mostly for gates. Cl. 32.1.7 discusses gate operators which are not within the scope of residential garage door operators. Cl. 32.2.1.2 was deleted. The clause right before it and after are about gate operators, which are out of scope for residential garage door operators. Cl. 37.3.2 is within the scope of the regulation because for the sensitivity test, it has changed the phrase “floor” with “level surface below the door or gate.” Cl. 37.3.2 also deleted the sentence “The photoelectric sensor is to be mounted at the highest position as recommended by the manufacturer.” Deleting this sentence does not result in a reduction in safety because the test heights are identified by reference to Cl. 37.3.1 which then references Cl. 35.1.1 (16 CFR 1211.10(a)(1)). Prior to this change, 1211.10(a)(1) already indicated the test heights and therefore the removed sentence made this confusing prior to the revision. With this sentence removed, the requirement is clear and the references are correctly identified to determine the proper test height.
5. Editorial Interconnection Cable Reference Correction; 54.1
This revision does not impact entrapment because this reference is about the electrical aspects of residential garage door operator product, therefore out of scope of the regulation.
6. Puncture Resistance Test Clarification to Include Gates; 55.1 – 55.3
This revision adds gates to the puncture resistance test. Gates are out of scope of the regulation for residential garage doors.
7. CGI Changes; 60.8.4, Table *B.1*
This revision is about gate operators which are out of scope of the regulation for residential garage door operators.

8. Revision of the Important Safety Instructions to add “Severe” Injury to WARNING; 60.8.5, Table *B.1*

This revision is about gate operators which are out of scope of the regulation for residential garage door operators.

This revision is about instructions for gate operators, which are out of scope for residential garage door operators.

9. Revision of the Important Safety Instructions to Change Reference from “Emergency” Release to “Manual” Release; 60.8.5, Table *B.1*

This revision is about instructions for gate operators, which are out of scope for residential garage door operators.

10. Editorial Revision of Table *B.1*

This revision is about instructions for gate operators, which are out of scope for residential garage door operators.

Appendix D – Consumer Product Safety Improvement Act of 1990, Section 203

(a) Consumer Product Safety Rule.—The provisions of subsection (b) shall be considered to be a consumer product safety rule issued by the Consumer Product Safety Commission under section 9 of the Consumer Product Safety Act [15 U.S.C. 2058].

(b) Requirements.—

(1) Effective on and after January 1, 1991, each automatic residential garage door opener manufactured on or after that date for sale in the United States shall conform to the entrapment protection requirements of the American National Standards Institute Underwriters Laboratories, Inc. Standards for Safety—UL 325, third edition, as revised May 4, 1988.

(2)(A) Effective on and after January 1, 1993, all residential automatic garage door openers manufactured on and after such date for sale in the United States shall conform to any additional entrapment protection requirements of the American National Standards Institute Underwriters Laboratories, Inc. Standards for Safety—UL 325, third edition, which were issued after the date of the enactment of this Act [Nov. 16, 1990] to become effective on or before January 1, 1993.

(B) If, by June 1, 1992, the Underwriters Laboratories, Inc., has not issued a revision to the May 4, 1988, Standards for Safety—UL 325, third edition, to require an entrapment protection feature or device in addition to that required by the May 4, 1988, Standard, the Consumer Product Safety Commission shall begin a rulemaking proceeding, to be completed no later than October 31, 1992, to require an additional such feature or device on all automatic residential garage door openers manufactured on or after January 1, 1993, for sale in the United States. If such a revision is issued by the Underwriters Laboratories, Inc. after the rulemaking has commenced, the rulemaking shall be terminated and the revision shall be incorporated in the consumer product safety rule under subsection (a) unless the Commission has determined under subsection (c) that such revision does not carry out the purposes of subsection (b).

(c) Revision of Rule.—If, after June 1, 1992, or the date of a revision described in subsection (b)(2)(B) if later, the Underwriters Laboratories, Inc. proposes to further revise the entrapment protection requirements of the American National Standards Institute Underwriters Laboratories, Inc. Standards for Safety—UL 325, third edition, the Laboratories shall notify the Consumer Product Safety Commission of the proposed revision and the proposed revision shall be incorporated in the consumer product safety rule under subsection (a) 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 subsection (b).

(d) Labeling.—On and after January 1, 1991, a manufacturer selling or offering for sale in the United States an automatic residential garage door opener manufactured on or after January 1, 1991, shall clearly identify on any container of the system and on the system the month or week and year the system was manufactured and its conformance with the requirements of subsection (b). The display of the UL logo or listing mark, and compliance with the date marking

requirements of UL 325, on both the container and the system, shall satisfy the requirements of this subsection.

(e) Notification.—Effective on and after July 1, 1991, all manufacturers of automatic residential garage door openers shall, in consultation with the Consumer Product Safety Commission, notify the public of the potential for entrapment by garage doors equipped with automatic garage door openers and advise the public to test their openers for the entrapment protection feature or device required by subsection (b).

(f) Preemption.—In applying section 26(a) of the Consumer Product Safety Act (15 U.S.C. 2075) [15 U.S.C. 2075(a)] with respect to the consumer product safety rule of the Consumer Product Safety Commission under subsection (a), only those provisions of laws of States or political subdivisions which relate to the labeling of automatic residential garage door openers and those provisions which do not provide at least the equivalent degree of protection from the risk of injury associated with automatic residential garage door openers as the consumer product safety rule provides shall be subject to such section.

(g) Regulations.—Section 553 of title 5, United States Code, shall apply with respect to the issuance of any regulations by the Consumer Product Safety Commission to implement the requirements of this section and sections 7 and 9 of the Consumer Product Safety Act [15 U.S.C. 2056, 2058] do not apply to such issuance. Any additional or revised requirement issued by the Commission shall provide an adequate degree of protection to the public.

(h) Construction.—Nothing in this section shall affect or modify in any way the obligations or liabilities of any person under the common law or any Federal or State law.

Appendix E – ULSE Notification Letter

May 19, 2023

U.S. Consumer Product Safety Commission
Ms. Alberta Mills
Office of the Secretary
4330 East-West Highway
Bethesda, MD 20814

Subject: UL 325 - Published Revisions

Dear Ms. Mills,

In accordance with Public Law 101-608, Underwriters Laboratories Inc. hereby notifies the CPSC regarding published revisions to the seventh edition of the Standard for Door, Drapery, Gate, Louver, and Window Operators and Systems, UL 325. UL 325 has had three revisions since the last notification was sent.

On July 6, 2018, UL proposed revisions to the residential garage door operator portion of UL 325. Ballots and comments to these proposed revisions were due September 19, 2018. During the course of UL’s consensus (STP) process, additional revisions to the proposal were necessary. UL proposed these revisions to the STP on April 19, 2019. Ballots and comments to these proposed revisions were due May 20, 2019. No additional changes were made to the proposal, and revisions were published July 12, 2019.

On October 18, 2019, UL proposed revisions to the residential garage door operator portion of UL 325. Ballots and comments to these proposed revisions were due December 18, 2019. No additional changes were made to the proposal, and revisions were published February 28, 2020.

On March 4, 2022, UL proposed revisions to the residential garage door operator portion of UL 325. Ballots and comments to these proposed revisions were due May 10, 2022. During the course of UL’s consensus (STP) process, additional revisions to the proposal were necessary. UL proposed these revisions to the STP on August 19, 2022. Ballots and comments to these proposed revisions were due October 19, 2022. No additional changes were made to the proposal, and revisions were published February 21, 2023.

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,

AMY K. WALKER

Project Manager for STP 325

UL Standards & Engagement

Reviewed by:

TIM CORDER

Chair for STP 325

UL Standards & Engagement

Phone: (847) 664-2023

Phone: (919) 757-9906

E-mail: Amy.K.Walker@ul.org

E-mail: Tim.Corder@ul.org

cc: Subject 325

Jay Kadiwala, CPSC

David Martin, Director of Government Engagement

George Borlase, UL Standards & Engagement

Tim Corder, UL Standards & Engagement

Milos Coric, UL Standards & Engagement

Amy Walker, UL Standards & Engagement