



Transmitted by email

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Milos Coric

Technical Committee Chair for UL 0325 - Door, Drapery, Gate, Louver, and Window Operators and Systems  
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Dear Milos:

The U.S. Consumer Product Safety Commission staff (staff) reviewed the July 12, 2024, bulletin outlining proposed changes in requirements in UL 325 - *Standard for Door, Drapery, Gate, Louver, and Window Operators and Systems* that have are being circulated to the Technical Committee (TC) 0325 for review and balloting.<sup>1</sup> Staff has the following comments on the proposals related to the entrapment prevention requirements for automatic residential garage door operators. I am also submitting these comments in the UL Standards & Engagement (ULSE) Collaborative Standards Development System (CSDS).

Proposal #7. 33.4.1 Exception for Battery Backup

**Comment:** CPSC staff opposes the addition of Exception No.2. Staff consider that removing the requirement to manually detach the door operator from the door would decrease the safety of the system. Manual operation of the residential garage door in the event of power loss or failure of the garage door operator is a safety provision that should not be exempt even for systems with a battery backup. Requirements for manual operation are specified in ANSI/CAN/UL 325 and in 16 C.F.R. Part 1211. These requirements specify location, markings, and force requirements with the door obstructed. This is a safety feature, intended to allow the consumer to manually raise the residential garage door in an entrapment event, including electrical system failure.

Proposal #18. 33.3.3 Secondary Entrapment Protection for Residential Garage Door Operators – Monitoring Clarifications

**Comment:** CPSC staff opposes the removal of the phrase “and correct operation” as proposed below:

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<sup>1</sup> This letter was prepared by the CPSC staff. It has not been reviewed or approved by, and may not represent the views of, the Commission.



“33.3.3 With respect to 33.3.1 and 33.3.2, the operator shall monitor for the presence ~~and correct operation~~ of the device at least once during each close cycle.”

Simply monitoring for the presence of the external entrapment protection device is insufficient to assure that the system is functional. For example, a photoelectric sensor that is misaligned may be detected and considered present but would not provide “correct operation.” Removing “and correct operation” would make it unclear if this condition is monitored. The proposed change therefore appears to be a decrease in safety of the residential door operator system.

Thank you for the opportunity to submit these comments. If you have any questions, please contact me at [jkadiwala@cpsc.gov](mailto:jkadiwala@cpsc.gov).

Sincerely,

Jay N. Kadiwala, Esq.  
Project Manager, Residential Garage Door Operators  
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CC: Ashley Seward, TC 0325 Project Manager, ULSE  
Jacqueline Campbell, CPSC Voluntary Standards Coordinator