

Return To:

R. Christopher Johnson
Door & Access Systems Manufacturers' Association, International
1300 Sumner Avenue
Cleveland, OH 44115-2851
E-MAIL: jboyle@taol.com
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SUBJECT: BSR/DASMA 116-200X, Standard for Section Interfaces on Residential
Garage Door Systems

Mr. Johnson:

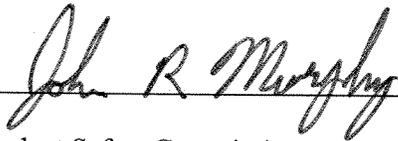
We have reviewed your letter of October 23, 2006 regarding the subject standard and wish to vote as follows:

We wish to vote, as follows:

- Approve
- Approve with comments
- Disapprove with comments
- Abstain with comments

Comments: The comments of the U.S. Consumer Product Safety Commission staff are attached in a letter to Mr. Johnson. The comments in this letter are those of the staff, have not been reviewed or approved by, and may not reflect the views of the Commission.

Submitted By: John R. Murphy



Company: United States Consumer Product Safety Commission

Please Return To the DASMA Office

By December 17, 2006.



U.S. CONSUMER PRODUCT SAFETY COMMISSION
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BETHESDA, MD 20814

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December 15, 2006

Mr. R. Christopher Johnson
Door & Access Systems Manufacturers'
Association, International
1300 Sumner Avenue
Cleveland, OH 44115-2851

Dear Mr. Johnson:

The U.S. Consumer Product Safety Commission (CPSC) staff is writing this letter* in response to your request for an American National Standards Institute (ANSI) review of the DASMA 116-200x, Standard for Section Interfaces on Residential Garage Door Systems.

The need for this standard has not diminished in the intervening years since the development of the standard was begun. In 1996, there were an estimated 8,520 finger injuries, including 190 amputations, associated with sectional garage doors treated in hospital emergency rooms. A recent review of finger injuries reported to the CPSC through the National Electronic Injury Surveillance System (NEISS) indicated that for the five-year period from January 1, 2000 through December 31, 2005, there was an estimated average of 10,440 finger injuries each year associated with sectional garage doors treated in hospital emergency rooms, including 220 amputations. These numbers have not been evaluated for statistical significance or changes to the NEISS system during this time period. However, the number of incidents does not appear to be decreasing.

The CPSC staff believes that garage doors that meet the standard by passing the performance test for pinch resistance in Section 6 are more likely to prevent and reduce the severity of finger injuries than doors that meet the standard by providing handles following the provisions of Section 7. The reason is that it is preferable to design a hazard out of a product rather than rely upon changing consumer behavior.

* These comments are those of the CPSC staff and have not been reviewed or approved by, and may not necessarily reflect the views of, the Commission

The CPSC staff has reviewed the standard and has the following comments:

1. The DASMA 116 standard should contain a requirement for a conspicuously located warning label that warns of the potential pinch area that exists between section joints of garage doors that meet the DASMA 116 standard through Section 7. Installation/Instruction manuals should also be required to state the importance of installing handles or gripping points when the door meets the standard through Section 7 of the standard. Since doors that meet the standard through Section 6 address the pinching risk through performance measures, they should not be required to have warning labels or instructions that warn of pinch resistance. The CPSC staff considers the DASMA 116 standard the appropriate standard for such warnings since it addresses finger entrapment risk posed by section interfaces.
2. Paragraph 7.1 states that "Lift handles ... shall be installed on, or incorporated into, both the inside and the outside of the door..." Since the DASMA 116 standard is a manufacturing standard, the CPSC staff interpretation is that this paragraph is placing the responsibility for installing the handles or gripping points on the manufacturer of the garage door. The CPSC staff believes that the standard should directly state that the manufacturer shall install the handles on the garage door before shipment or take some positive action to ensure that the handles are installed on the garage door. This is necessary to ensure that when the door becomes operational and is opened and closed by consumers, the handles will be installed on the garage door.
3. The staff believes that the Section 7 allowances should be terminated at some predetermined future time and that the performance requirements of Section 6 should eventually dominate the standard for the reasons given above.

Thank you for the opportunity to participate in the ANSI canvas ballot. Please contact me if you have any questions or comments.

Sincerely,



John R. Murphy