



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: November 27, 2013

TO : The Commission  
Todd A. Stevenson, Secretary

THROUGH: Elliot F. Kaye, Executive Director  
Stephanie Tsacoumis, General Counsel

FROM : Patricia M. Pollitzer, Assistant General Counsel

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

TIME CRITICAL BALLOT VOTE Due: December 2, 2013

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. In 1990, Public Law 101-608 mandated that the entrapment protection provisions of UL 325 be considered a consumer product safety rule. The Commission issued regulations for GDOs that set forth the entrapment protection provisions of UL 325 in effect at that time. 16 C.F.R. part 1211. The statute 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 revisions. Should the Commission concur with staff's recommendation, the Office of Hazard Identification and Reduction will work with the Office of the General Counsel to prepare a draft notice of proposed rulemaking (NPR) to revise 16 C.F.R. part 1211 to include the UL revision. Thereafter, staff will present the draft NPR to the Commission for the Commission's approval.

Section V of the Commission's Decision Making Procedures allows a matter to be designated time critical by the Executive Director or the General Counsel. This matter has been deemed time critical under this provision by the General Counsel, who has set the time critical date for decision, so that the Commission may vote before the statutory 30-day period expires.

Page 1 of 2

Please indicate your vote on the following options:

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

\_\_\_\_\_  
Signature Date

- II. Do not approve staff's recommendation to allow the revision 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 Memo 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: November 27, 2013

TO : The Commission  
Todd Stevenson, Secretary

THROUGH: Stephanie Tsacoumis, General Counsel  
Elliot F. Kaye, Executive Director

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

John R. Murphy, Mechanical Engineer  
Directorate for Engineering Sciences

SUBJECT : Revision of Residential Garage Door Operator Standard, 16 CFR Part 1211

On November 4, 2013, Underwriters Laboratories Inc. (UL), notified the U.S. Consumer Product Safety Commission (CPSC) that UL has revised the entrapment protection requirements of UL's voluntary standard titled, "Standard for Safety for Door, Drapery, Gate, Louver, and Window Operators and Systems," also known as UL 325. In the Consumer Product Safety Improvement Act of 1990 (the Improvement Act), Congress mandated that all automatic residential garage door operators (GDOs) conform to the entrapment protection requirements of UL 325. In response to this mandate, the Commission issued a 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 the proposed revisions. Those changes must be incorporated into the Commission rule, unless the Commission notifies UL within 30 days that the Commission has determined that the revisions do not carry out the purposes of the entrapment protection requirements of the Improvement Act.

UL modified UL 325 on October 14, 2013, with 17 changes. The 17 changes are listed on page "tr1" of the attached copy of UL 325 Sixth Edition. Commission staff determined that seven of the changes do not affect 16 C.F.R. part 1211 because they are changes to gate operators not covered by the Commission's GDO safety standard or they are changes to requirements that are not entrapment protection requirements, such as detachable power supply cords or requirements for light sources other than incandescent light bulbs.

Of the remaining 10 changes, six were suggested by UL to improve clarity of the standard, describe test conditions better (better descriptions of conditions currently used by UL), and revise tolerances on test fixtures so that they can be manufactured using generally available

machine tools. The remaining four changes apply to instructions and operation and maintenance manuals. Three of these four requirements have been changed to clarify the title of the instructions, the intended user of the accompanying instruction manual, and the instructional and marking requirements for installations less than 8 feet above the floor. The tenth change is a new provision specifying that installation, operation, and maintenance instructions may be provided in electronic read-only media format, only if certain instructions are additionally provided with the operator in an instruction sheet, manual, booklet, or similar printed material.

Commission staff received official notification of UL's revision to UL 325 in a letter to the CPSC dated November 1, 2013 (attached). The Office of the Secretary received UL's letter on November 4, 2013. Under the Improvement Act, unless the Commission notifies UL before December 4, 2013 that the revisions do not carry out the purposes of the entrapment protection requirements of the Improvement Act, the changes must be incorporated into the Commission's product safety rule.

Commission staff recommends that the Commission allow the changes to UL 325 to be incorporated into the product safety standard for automatic residential GDOs. The CPSC's Engineering Sciences staff believes that the revisions enhance entrapment protection and are likely to reduce the possibility of children becoming entrapped under partially open garage doors. Specifically, the revisions will increase the clarity of instructions to GDO users, improve the description of conditions for testing GDOs, and allow manufacturers to use generally available machine tools to manufacture test fixtures. As a result, the standard will be easier for manufacturers to use, and the instructions for the product will be easier for consumers to understand.

Staff will work with the Office of the General Counsel to prepare a draft notice of proposed rulemaking (NPR) revising part 1211 to include the new UL requirements in the Commission's GDO rule. Thereafter, staff will forward the draft NPR to the Commission for a vote.

November 1, 2013

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 new sixth edition of the Standard for Door, Drapery, Gate, Louver, and Window Operators and Systems, UL 325.

On November 16, 2012, UL proposed revisions to the residential garage door operator portion of UL 325. Ballots and comments to these proposed revisions were due January 30, 2013. During the course of UL's consensus (STP) process, no changes were made to the proposal, and a new edition was published October 14, 2013.

Attached is a copy of the revised pages, related to residential garage door operators, as published in the Standard. If you have any questions, please feel free to contact me.

Yours truly,

Reviewed by:

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cc: Subject 325  
John Murphy, CPSC  
Sarah Owen, UL Government Affairs  
Joe Musso, UL Standards  
Amy Walker, UL Standards



Copy of UL 325 Sixth Edition. Double click to open copy.



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UL 325

**STANDARD FOR SAFETY**

Door, Drapery, Gate, Louver, and Window  
Operators and Systems



UL Standard for Safety for Door, Drapery, Gate, Louver, and Window Operators and Systems, UL 325  
Sixth Edition, Dated October 14, 2013

### ***Summary of Topics***

***The new edition dated October 14, 2013, were issued to incorporate the following new and revised requirements:***

- ***Revision to Remove Reference to the Terms "Primary" and "Secondary" when Describing Entrapment Protection Devices***
- ***Addition of Requirements for Detachable Supply Cords***
- ***Addition of Requirements for Light Sources Other than Incandescent Bulbs***
- ***Clarification of Permanently Mounted Wireless Devices***
- ***Reversal Requirements of B1 Protected Gate Operators***
- ***Residential Garage Door Operator Test Set-Up For Reversal Tests***
- ***Relocate External Entrapment Protection Requirement of Paragraph 34.1.6***
- ***Gate Operators with Wireless External Entrapment Protection***
- ***Revision of Pendulum Tolerance***
- ***Addition of an Exception to Paragraphs 37.3.1 and 37.3.2 Regarding Elastomer Testing***
- ***Correction of the Force Test Apparatus in Figure 47.2***
- ***Revised Tolerances for the Puncture Probe***
- ***Addition of Requirements for Electronic Instructions***
- ***Residential Garage Door Operator and System Instructions Titles***
- ***Clarification of the User Manual***
- ***Clarification of the Instructional and Marking Requirements for Installations Less Than 8 Feet Above the Floor***
- ***Revision of 58.8.4 to Align with ASTM F2200***

The new and revised requirements are substantially in accordance with Proposal(s) on this subject dated November 16, 2012.

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The requirements in this Standard are now in effect, except for those paragraphs, sections, tables, figures, and/or other elements of the Standard having future effective dates as indicated in the note following the affected item. The prior text for requirements that have been revised and that have a future effective date are located after the Standard, and are preceded by a "SUPERSEDED REQUIREMENTS" notice.

The following table lists the future effective dates with the corresponding item.

| Future Effective Date | References   |
|-----------------------|--|
| December 23, 2014     | 3.3, 3.15, 32.1.2, 32.1.3, 32.2.2.1, 32.2.2.3, 32.2.2.7, 32.2.2.8, 32.3.1, 32.3.6, 58.3.6, 58.3.7, 59.11 – 59.13; and Section 47 |
| January 12, 2016      | 3.4, 3.11, 3.19, 25.11, 31.1.1, 31.1.2, 31.1.6, 31.1.7, 31.1.15, 31.2.1.1, 31.2.1.2, 58.1.6, 58.6.7, 61.5.1, and Table 31.1      |