



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

This document has been electronically
approved and signed.

Date: June 24, 2015

BALLOT VOTE SHEET

TO : The Commission
Todd A. Stevenson, Secretary

THROUGH: Patricia A. Adkins, Executive Director
Stephanie Tsacoumis, 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: June 30, 2015

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. UL notified the Commission of these revisions on June 4, 2015.

Public Law No. 101-608 mandated that the entrapment protection provisions of UL 325 be considered a consumer product safety rule. The statute further provided 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.

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: June 24, 2015

TO : The Commission
Todd Stevenson, Secretary

THROUGH: Stephanie Tsacoumis, General Counsel
Patricia H. Adkins, Executive Director
Robert J. Howell, Deputy Executive Director for Safety Operations

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 6th 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, 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 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. Those changes must be incorporated into the Commission’s rule unless the agency notifies UL within 30 days that the Commission has determined 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.

UL previously notified the Commission of earlier revisions to UL 325 (by letter dated November 1, 2013). The Commission voted on December 3, 2013 to allow the revisions to be

incorporated into the Commission's GDO standard. (See the record of decision at: <http://www.cpsc.gov/en/Newsroom/FOIA/Records-of-Commission-Action-and-Commission-Meeting-Minutes/2014/2014-DOCs/Draft-RCA-Automatic-Residential-Garage-Door-Operators/>) Staff is currently preparing a draft notice of proposed rulemaking ("NPR") to revise the mandatory GDO rule at 16 C.F.R. part 1211 to include UL's 2013 revisions.

On June 4, 2015, UL notified the Commission that UL published revisions to UL 325 6th Edition on May 25, 2015 (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 4, 2015 to prevent the changes from being incorporated into the Commission's product safety rule.

The recent revisions comprise 24 changes to UL 325 6th Edition. The 24 changes are listed in Appendix A.¹ Commission staff reviewed these changes.

Commission staff determined that 12 of the changes do not affect 16 C.F.R. part 1211 because they are changes to commercial doors, gate operators, and pedestrian doors, which are not covered by the Commission's GDO safety standard, or they are changes to requirements that are not entrapment protection requirements, such as changes to permanent wiring or normal temperature testing requirements.

The 12 remaining revised requirements (summarized below²) would affect the Commission's safety standard for GDOs. All 12 changes were made by UL to improve clarity of the standard and describe test conditions better..

9. Markings Required for the Means to Manually Detach a Residential Garage Door

Corrects an incorrect cross reference within the standard for markings required for the means to manually detach a residential GDO (§ 1211.9(a) and § 1211.15 (a)(3)).

11. Unattended Operation Clarifications

Clarifies intent of requirements for GDOs with an unattended operation feature (§ 1211.14(b), (c), (d), (e), and (f)) and better aligns the requirements with products that include unattended operation function, such as changing the word "bulb" to "light" to address newer technologies that may utilize LEDs which may not be considered "bulbs" and clarifies that the visual or audio alarm during unattended operation does not required to be monitored.

12. External Entrapment Protection Device Test Criteria

Clarifies external entrapment protection device (i.e. photoelectric sensor and edge sensor) test criteria (§ 1211.10(b), (c), and (e) and § 1211.11(e)(4)) making the requirements consistent throughout the standard for determining whether the system is operating normally before and after each test.

13. Floodlamp Specification for Ambient Light Test

Allows for alternate sources of light source for the photoelectric sensor ambient light test (§ 1211.11(e)(2)). The current test method specifies a specific DXC-RFL-2 flood lamp which is becoming difficult to obtain in the marketplace. Instead the requirement will

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.

specify the minimum required wattage (500W) and maximum color temperature (3600K) of the bulb to allow for available light sources without affecting the test results.

14. *External Entrapment Protection Device Elastomeric Material Test Clarification for UL 157*
Clarifies test requirements for elastomeric material used in external entrapment protection devices (§ 1211.12(c)) by moving a sentence to align with the specific test requirement that it applies to.
15. *Vertical Photoelectric Arrays*
Adds new test method for GDOs that are currently on the market that utilize an array of “vertical” photoelectric sensors as a non-contact external entrapment protection device (§ 1211.11 (d)(4) and new sub-paragraph (f)). The new method verifies that the “vertical” sensors function properly.
17. *Clarification of Requirement for Switch or Relay Used in Entrapment Protection Circuit*
Clarifies requirements for switch or relay used in entrapment protection circuit (§ 1211.6(f)) by stating that the switch or relay must be capable of operating at a minimum cycling of 100,000 cycles as intended in the operator without failing *and* that when/if failure does occur in actual use (at any cycle count) it shall result in preventing further operation of the door.
18. *Electronic Instructions*
Clarifies that electronic instructions (§ 1211.16(a)(10)) may be provided on alternate sources, such as CD-Rom, USB flashdrive or company website.
19. *Exceptions to One Piece Door Marking For Residential Door Operators*
Clarifies that for GDOs for one-piece doors that have an unattended operation function, certain markings are not required if the GDO automatically senses door operation (§§ 1211.16(b)(1(ii), 1211.17(h), and 1211.18(m)).
21. *Paragraph 61.1.2 Rating and Date Code*
Clarifies requirements for UL markings for voltage, frequency, and input (§ 1211.18(b)(3) and (4)).
22. *Residential Garage Door Operator User Adjustment Marking Location*
Clarifies location of UL marking requirements for risk of entrapment on GDOs that have user adjustments (§ 1211.18(i)) by specifying the marking shall be located where visible to the user when making adjustments.
23. *Marking for Accessories*
Clarifies UL marking requirements for separately supplied accessories, including external entrapment protection devices (§ 1211.18(j)) by specifying that the instructions, packaging, or markings on the product shall indicate the accessory manufacturer’s name and model number and the types of appliances for which it can be used.

If the Commission votes to allow UL’s 2015 revisions to be incorporated into 16 C.F.R. part 1211, staff will include these more recent revisions in the draft NPR that incorporates the 2013 UL revisions.

Commission staff recommends that the Commission allow the most recent entrapment protection changes to UL 325 6th Edition to be incorporated into the mandatory product safety standard for automatic residential GDOs at 16 C.F.R. part 1211. Engineering Sciences staff believes that the various revisions improve the level of safety afforded by the mandatory standard by making it easier to conduct tests, providing better instructions/markings to the user, and by modifying test requirements to cover technologies currently on the market. These changes will further reduce the risk of child entrapment under partially open garage doors, and thus

further the purposes of the Improvement Act. Should the Commission conclude that incorporation of the 2015 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 new UL 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, Sixth Edition, Dated October 14, 2013

Summary of Topics

The revisions dated May 26, 2015, were issued to incorporate the following new and revised requirements (Revisions that effect GDO entrapment protection are in bold):

1. *Permanent Wiring of Residential Garage Door Operators*
2. *Clarification of Requirement for Solid-State Safety Control for Gates and Doors*
3. *Minimum Distance for Vehicular Barrier Arm Installations*
4. *Contact Sensor Placement for Swing Gates with Specific Clearances*
5. *Clarification of Placards Location for Gate Installations*
6. *Table 31.1 Editorial Revisions for 31.2.1.1*
7. *Constant Pressure Activation for a Failed External Entrapment Protection Device on Gate Operators*
8. *Markings for Type D Entrapment Protection Devices for Gate Operators*
9. ***Markings Required for the Means to Manually Detach a Residential Garage Door***
10. *Pedestrian Door Operators Revisions to Align with ANSI/BHMA A156.10*
11. ***Unattended Operation Clarifications***
12. ***External Entrapment Protection Device Test Criteria***
13. ***Floodlamp Specification for Ambient Light Test***
14. ***External Entrapment Protection Device Elastomeric Material Test Clarification for UL 157***
15. ***Vertical Photoelectric Arrays***
16. *Rated Pull for Residential Garage Door Operators*
17. ***Clarification of Requirement for Switch or Relay Used in Entrapment Protection Circuit***
18. ***Electronic Instructions***
19. ***Exceptions to One Piece Door Marking For Residential Door Operators***
20. *Paragraphs 58.6.5 and 58.6.7 Manual Release Instructions*
21. ***Paragraph 61.1.2 Rating and Date Code***
22. ***Residential Garage Door Operator User Adjustment Marking Location***
23. ***Marking for Accessories***
24. *Guarding for Moving Parts of Operators Installed Less than 8 feet*

June 4, 2015

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 October 17, 2014, UL proposed revisions to the residential garage door operator portion of UL 325. Ballots and comments to these proposed revisions were due December 1, 2014. During the course of UL's consensus (STP) process, additional revisions to proposal were necessary. UL proposed these revisions to the STP on February 20, 2015. Ballots and comments to these proposed revisions were due March 20, 2015. No additional changes were made to the proposal, and revisions were published May 26, 2015.

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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