



U.S. CONSUMER PRODUCT SAFETY COMMISSION  
WASHINGTON, DC 20207

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Ms. Amy K. Walker  
Secretary for STP 325  
Project Engineer  
Standards Department  
Underwriters Laboratories Inc.  
333 Pfingsten Road  
Northbrook, IL 60062

Dear Ms. Walker:

The U.S. Consumer Product Safety Commission (CPSC) staff reviewed the proposed requirements for the Fifth Edition of the Standard for Door, Drapery, Gate, Louver, and Window Operators and Systems (UL 325) and has the following comments.

1. The CPSC staff believes that for inherent entrapment protection systems the standard should require four inches of reversal rather than the two inches currently specified on the ballot. In the case of soft tissue, it may be possible to compress the tissue over two inches before the inherent system is triggered to recognize an obstruction. A reversal of more than two inches may be necessary to completely free an entrapped person.
2. Section 32.3.2 b) The proposed wording as shown on the ballot is as follows:  
Except for the first activation of the momentary-contact manual control after a fault condition or obstruction occurs, the operator shall function as required by 32.1.2(a).

Exception: If the operator has sensed an obstruction in the upward direction within 5 min prior to the activation, the operator may function as required by 32.1.2(a) on the first control activation.

The CPSC staff believes that this wording is confusing and would allow a fully open garage door to close one time under momentary contact control without the external entrapment protection device functioning, which could present a new risk of injury. The staff believes that it is important to state exactly what operations are required during the first activation after a fault condition or an obstruction in the secondary entrapment protection system. We are proposing a requirement that an open door shall close not more than 1 foot on the first activation. The intent of this requirement is to prevent an

open door from closing on the first activation with the secondary entrapment protection system indicating a fault condition or an obstruction.

Inconsistent operation of the garage door operator may present a risk of injury. To address this, the staff is also proposing a requirement that the activation sequence reset back to the first activation condition after 5 minutes. The CPSC staff believes this requirement is needed to keep the button press sequence for constant contact always the same (press-release-press and hold). If the activation sequence does not reset the first time after a fault condition or an obstruction is detected, the sequence would be press-release-press and hold on the first activation only. All subsequent constant contact activations would be press-and-hold.

The CPSC staff suggests the following wording:

32.3.2 b) The operator shall function as follows:

- 1) On the first activation of the momentary-contact manual control after detecting that the device is not present or a fault condition or an obstruction occurs:
  - a) the garage door operator shall function as required by 32.1.2(a)(3),
  - b) a closed door shall open,
  - c) an open door shall close no more than 1 ft (305 mm) below the upmost position, and
  - d) a partially open door shall function as required by 32.4.2.

Exception: If the operator has sensed an obstruction in the upward direction within 5 min prior to the activation, the operator shall function as required by 32.1.2(a) on the first control activation.

- 2) On each subsequent activation within 5 minutes of detecting that the device is not present or a fault condition or an obstruction occurs the door shall function as required by 32.1.2(a).
- 3) The activation sequence shall be reset back to the first activation condition after 5 minutes of inactivity.

These comments represent the views of the CPSC staff, and have not been reviewed or approved by the Commission. Please feel free to call me if you have any questions.

Sincerely,



John R. Murphy