



MEETING LOG

SUBJECT: Clarification of Topic 18 for ANSI/CAN/UL 325 Ballot & 16 CFR Part 1211 Official Notice Process

DATE OF MEETING: Friday, October 18, 2024, 09:00 AM ET to 09:45 AM ET

LOG ENTRY SOURCE: Jay Kadiwala, ESEF

NON-CPSC ATTENDEES: Stephen R. Kuscsik, UL Solutions
Ashley Seward, UL Standards & Engagement (ULSE)
Milos Coric, UL Solutions
Patrick Plateauw, UL Solutions

CPSC ATTENDEES: Jay Kadiwala, ESEF

SUMMARY OF MEETING:

CPSC staff requested this meeting to discuss UL's response to a CPSC staff comment on proposed revised requirements for auto-monitoring of the secondary entrapment protection device for residential garage door operators (Topic 18 on Clause 33.3.1 in ULSE's July 12, 2024, bulletin) in ANSI/CAN/UL 325 – *Standard for Safety for Door, Drapery, Gate, Louver and Window Operators and Systems* (UL 325). Despite staff's comment, the Technical Committee (TC) had subsequently accepted the proposed revision on the ballot, which closed September 20, 2024. CPSC staff is a nonvoting member of the UL 325 TC.

Since some of the UL staff on UL 325 are new to the TC, Mr. Kadiwala first provided an overview of the product safety rule, Safety Standard for Automatic Residential Garage Door Operators (16 C.F.R. Part 1211), which is based on UL 325. When UL Standards & Engagement (ULSE) publishes adopted changes to the entrapment protection provisions of UL 325 for residential garage door operators, the Improvement Act requires ULSE to notify the Commission of the relevant proposed revisions. Improvement Act, § 203(c). ULSE's changes must be incorporated into part 1211, unless the Commission notifies ULSE within 30 days that the Commission has determined that the revisions do not carry out the purposes of section 203(b) of the Improvement Act, which is to prevent entrapment by residential garage doors controlled by an automatic garage door operator.

The next topic was CPSC's comment. CPSC submitted a comment recommendation against the proposed revision in Topic 18 into the ULSE Collaborative Standards Development System (CSDS) on August 30, 2024. The UL 325 Technical Committee subsequently accepted the proposed revision on the ballot closed on September 20, 2024. CPSC staff contacted UL Solutions for comment and a phone call was scheduled between Jay Kadiwala and Stephen Kuscsik (UL Solutions) on September 30, 2024. This meeting was scheduled after that call, to



make sure all of the relevant stakeholders in this process had a common understanding of both the notification process and substantive technical comments.

Mr. Kuscsik indicated that although ULSE does not customarily respond to comments from nonvoting TC members, he would create a complete comment resolution to CPSC's comment and post it into Topic 18's Comment Area in CSDS.

Next Steps:

CPSC staff will continue to monitor activities of the UL 325 TC.