



Ballot Vote Sheet

TO: The Commission
Alberta E. Mills, Secretary

DATE: September 23, 2026

THROUGH: Matthew A. Campbell, General Counsel
Paul Brubaker, Executive Director

FROM Daniel R. Vice, Assistant General Counsel, Regulatory Affairs
David M. DiMatteo, Attorney, Regulatory Affairs

SUBJECT: Draft Direct Final Rule: Safety Standard for Automatic Residential Garage Door Operators

BALLOT VOTE DUE: September 29, 2026

The Commission regulates certain entrapment hazards associated with residential automatic garage door operators under the Consumer Product Safety Improvement Act of 1990 (Improvement Act). In that statute, Congress provided that the requirements of Underwriters Laboratories' voluntary standard UL 325, Standard for Safety: Door, Drapery, Gate, Louver, and Window Operators and Systems, shall be considered a consumer product safety rule of the Commission under the Consumer Product Safety Act. Pub. L. 101-608, §§ 3(a) and 3(b) (Nov. 16, 1990). Congress also provided that whenever Underwriters' Laboratories proposes to revise UL 325, it shall notify the Commission of the proposed revision, and that the proposed revision shall be incorporated into the consumer product safety rule unless the Commission determines, within 30 days of such notice, that the proposed revision does not carry out the purposes of the Improvement Act. Id. § 203(c).

The Commission has codified the entrapment protection requirements for residential garage door operators in UL 325 at 16 C.F.R. part 1211 and periodically revises those requirements as necessary when Underwriters Laboratories revises UL 325. On September 23, 2025, UL notified the Commission that it had again revised the entrapment protection provisions in UL 325. The Commission did not reject the revision to UL 325. As a result, that revision must be incorporated into the Commission's consumer product safety rule.

The Office of the General Counsel (OGC) recommends that the Commission amend the Commission's garage door opener standard, 16 C.F.R. part 1211, to reflect the changes UL made to UL 325. To accomplish this, OGC has drafted the attached draft direct final rule, the text of which explains the legal basis for using a direct final rule in lieu of notice-and-comment procedures under the Administrative Procedure Act.

U.S. Consumer Product
Safety Commission
4330 East-West Highway
Bethesda, MD 20814

National Product Testing
and Evaluation Center
5 Research Place
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OS 2

Please indicate your vote on the following options:

- I. Approve publication of the attached notice in the *Federal Register*, as drafted.

(Signature)

(Date)

- II. Approve publication of the attached notice in the *Federal Register*, with the specified changes.

(Signature)

(Date)

- III. Do not approve publication of the attached notice in the *Federal Register*.

(Signature)

(Date)

- IV. Take other action specified below.

(Signature)

(Date)

Attachment: Draft Direct Final Rule: Safety Standard for Automatic Residential Garage Door Operators

Billing Code 6355-01-P]

CONSUMER PRODUCT SAFETY COMMISSION

16 CFR Part 1211

[Docket No. CPSC-2015-0025]

Safety Standard for Automatic Residential Garage Door Operators

AGENCY: U.S. Consumer Product Safety Commission.

ACTION: Direct final rule.

SUMMARY: In October 2025, updates to the entrapment protection provisions in the UL 325 standard were accepted under the Consumer Product Safety Improvement Act of 1990 (Improvement Act) for inclusion in the Commission’s mandatory safety regulation for automatic residential garage door operators. In this direct final rule, the Consumer Product Safety Commission (Commission) is amending the Commission’s automatic residential garage door operators mandatory regulation to align with the changes in UL 325.

DATES: The rule is effective on **[Insert date 60 days after publication in the FEDERAL REGISTER]**, unless we receive significant adverse comments by **[Insert date 30 days after publication in the FEDERAL REGISTER]**. If we receive timely significant adverse comments, we will publish a notification in the *Federal Register*, withdrawing this direct final rule before its effective date. The incorporation by reference of the publication listed in this rule is approved by the Director of the Federal Register as of **[Insert date 60 days after publication in the FEDERAL REGISTER]**.

ADDRESSES: You can submit comments, identified by Docket No. CPSC- 2015-0025, by any of the following methods:

Electronic Submissions: Submit electronic comments to the Federal eRulemaking Portal at: <https://www.regulations.gov>. Follow the instructions for submitting comments. CPSC typically does not accept comments submitted by email, except as described below.

Confidential Written Submissions: CPSC encourages you to submit electronic comments by using the Federal eRulemaking Portal. If you wish to submit confidential business information, trade secret information, or other sensitive or protected information that you do not want to be available to the public, you may submit such comments by email to cpsc-os@cpsc.gov.

Instructions: All submissions must include the agency name and docket number. CPSC may post all comments without change, including any personal identifiers, contact information, or other personal information provided, to: <https://www.regulations.gov>. Do not submit to this website: confidential business information, trade secret information, or other sensitive or protected information that you do not want to be available to the public. If you wish to submit such information, please submit it according to the instructions for confidential written submissions.

Docket: For access to the docket to read background documents or comments received, go to: <https://www.regulations.gov>, and insert the docket number, CPSC-2015-0025, into the “Search” box, and follow the prompts.

FOR FURTHER INFORMATION CONTACT: Julio Alvarado, Compliance Officer, U.S. Consumer Product Safety Commission, 441 G Street NW, Washington, DC 205486; telephone: (301) 504-7418; email: jalvarado@cpsc.gov; or Jay Kadiwala, Electrical Engineer, U.S. Consumer Product Safety Commission, National Product Testing &

Evaluation Center, 5 Research Place, Suite 101-09, Rockville, MD 20850; telephone (301) 987-2517; email: jkadiwala@cpsc.gov.

SUPPLEMENTARY INFORMATION:

I. Background

Section 203(a) and (b) of the Improvement Act, Public Law No. 101-608, states that the entrapment protection requirements of UL 325, “Standard for Safety for Door, Drapery, Gate, Louver, and Window Operators and Systems,” (UL 325), are considered a consumer product safety rule under the Consumer Product Safety Act (CPSA). 15 U.S.C. 2056 Note. On June 19, 1991, as mandated by the Improvement Act, the Commission issued a final rule codifying the provisions of the entrapment protection requirements of UL 325 at 16 CFR part 1211. 56 FR 28050. On December 21, 1992, as directed in section 203(b) of the Improvement Act, the Commission published a final rule to include the additional entrapment protection provisions adopted by UL in UL 325 in the CPSC mandatory standard for automatic residential garage door operators. 57 FR 60449.

Section 203(c) of the Improvement Act requires UL to notify CPSC of any revisions to UL 325, which is the basis for the Commission’s garage door operator (GDO) regulation. When UL notifies the Commission of a revision, that revision “shall be incorporated in the consumer product safety rule . . . unless, within 30 days of such notice, the Commission notifies [UL] that the Commission has determined that such revision does not carry out the purposes of subsection (b)” of section 203 of the Improvement Act, which initially mandated the UL 325 entrapment protection requirements. As provided in the Improvement Act, the Commission has revised the GDO standard several times following UL notification to the Commission of changes to

the entrapment protection requirements of UL 325. The Commission last updated the GDO rule in 2024, to reflect changes made to the entrapment protection provisions of UL 325 up to that time. 89 FR 18538 (Mar. 24, 2024).

On September 23, 2025, UL notified the Commission of revisions to UL 325 regarding the entrapment protection provisions related to residential garage door operators. In October 2025, in accordance with the procedure in the Improvement Act, the Commission accepted for inclusion in its mandatory standard the relevant revisions to UL 325 regarding the entrapment protection requirements for automatic residential GDOs. To implement the revisions to UL 325 for residential GDOs in the Commission mandatory standard, this direct final rule revises the provisions of the GDO rule at 16 CFR part 1211 to reflect the earlier acceptance of the revisions for the entrapment protection requirements for automatic residential GDOs in UL 325, Seventh Edition.

II. Changes to UL 325

Since the last update of the mandatory GDO regulation in 2024, there has been one published revision to UL 325: Seventh Edition, published on September 15, 2025. The revisions to UL 325 regarding the entrapment protection requirements for automatic residential GDOs are discussed in detail below.

A. Battery Powered Applications

Two new sections, 33.2.2.11 (GDOs Employing Battery Backup (Vertical Moving Doors) and 33.2.3.11 (GDOs Employing Battery Backup (Horizontally Sliding Doors), were added to UL 325. These provisions have new test requirements in sections 33.2.2.12 and 33.2.3.12, respectively, to ensure that the entrapment protection operations function under backup battery power but do not function if there is not enough battery

power for the garage door operator to complete an open/close cycle. In this circumstance, the system verifies there is enough battery charge to perform both an open and close cycle and if the system cannot do that function, the door will remain open and the entrapment protection system rendered inoperable, which causes the door to be inoperable, until the battery is charged or AC mains power is restored. The performance tests are conducted on the battery back-up at the lowest operational voltage (battery must be fully charged and then discharged to the manufacturer's specified lowest operating voltage) to ensure that the battery has enough stored energy for the operator to detect an object and open the door when there is no AC power. These new requirements support the purpose of the Improvement Act by ensuring the GDO will function to prevent entrapment even when AC power is cut and the system is powered by the battery backup at the lowest operational voltage.

B. Clarifications for Monitoring for Secondary Entrapment Protection for Residential Garage Door Operators Requirements

Residential garage door operator systems monitor the presence of the secondary entrapment protection device to ensure that it is ready for operation at least once during each close cycle. If the secondary entrapment protection device is not detected by the system circuit, is disconnected from the circuit, or there is an error in the device, the door will not operate. Section 33.3.3 of the UL standard currently states “operator shall monitor for the presence and correct operation of the device at least once during each close cycle.”

The revision to section 33.3.3 of UL 325 (contained in 16 CFR 1211.8(c)) also removes the phrase “and correct operation” regarding the secondary entrapment

protection device. The UL 325 Technical Committee made this change because there is no practical way to determine what the “correct operation” is to allow for testing to determine whether GDO systems were specifically meeting this requirement. Detecting the presence of the secondary entrapment protection device is sufficient to ensure the secondary entrapment protection device is functional and will respond if the primary system fails.

C. Instruction Manual Section

The revisions to UL 325 sections 60.1.14 (currently contained in 16 CFR 1211.16(a)(10)) and 60.3 (contained in 16 CFR 1211.16(a)(2)) remove inaccurate and misleading references to “residential garage doors.” Section 60.3.2 states that “[a] residential garage door operator or system shall be provided with complete and specific instructions for ... satisfactory operation of the door.” This change clarifies that the printed instructions required by UL 325 only apply to a garage door that is part of a residential garage door operator system and not a garage door by itself. This revision allows manufacturers to accurately communicate this information to consumers.

III. Description of the Direct Final Rule

The direct final rule amends 16 CFR part 1211 to include the revisions regarding the entrapment protection requirements for automatic residential GDOs in UL 325, Seventh Edition discussed above. All revisions in the direct final rule concern the GDO regulation in subpart A and D of part 1211. The direct final rule does not change any of the certification (subpart B), or recordkeeping (subpart C) provisions of the GDO regulation.

The revisions to 16 CFR part 1211 are described below.

- ***Changes to section 1211.4.*** Section 1211.4 updates the reference to UL 325-2025 and adds a new paragraph (d) stating the requirements of the rule also cover battery-powered operators, including operators with battery back-up systems.
- ***Changes to section 1211.5.*** Section 1211.5 updates the reference to UL 325-2025.
- ***Changes to section 1211.7.*** Section 1211.7 adds new paragraphs (b)(11), (b)(12), (c)(11), and (c)(12) with requirements for vertical and horizontal garage door operators employing a battery back-up system.
- ***Changes to section 1211.8.*** Section 1211.8(c) deletes the phrase “and correct operation” as the phrase is unnecessary because there is no practical way to determine what the “correct operation” is to allow for testing to determine whether GDO systems were specifically meeting this requirement. Section 1211.8(f) adds language from a previous revision to the standard that was inadvertently left out of the rule to be consistent with the language of the voluntary standard.
- ***Changes to section 1211.16.*** Section 1211.16(a)(2), (3), and (10)(i) add clarifying language “or system” after garage door operator to indicate it may apply to a whole system and not just the garage door operator, if applicable.
- ***Changes to section 1211.16.*** Section 1211.40(d)(1) updates the reference UL 325-2025 and adds Supplement C to the incorporation by reference.

This direct final rule amends the mandatory GDO rule at 16 CFR part 1211 to include the revisions to the entrapment protection requirements for automatic residential GDOs in UL 325-2025, Seventh Edition.

IV. Incorporation by Reference

Sections 1211.4, 1211.5, 1211.7, and 1211.40 of the direct final rule incorporate by reference provisions in UL 325-2025. The Office of the Federal Register (OFR) has regulations regarding incorporation by reference. 1 CFR part 51. Under these regulations, agencies must discuss in the preamble to a final rule ways in which material the agency incorporates by reference is reasonably available to interested parties and how interested parties can obtain the material. In addition, the preamble to the final rule must summarize the material. 1 CFR § 51.5(b).

In accordance with the OFR regulations requiring a summary of the material in the voluntary standard, the relevant provisions of UL 325:2025, *Standard for Door, Drapery, Gate, Louver, and Window Operators and Systems* cover performance requirements, test methods, and labeling requirements for residential garage door operators.

UL 325-2025 is copyrighted. UL 325-2025 is reasonably available to interested parties in several ways. A read-only copy of the revised standard UL 325-2025 is available to view at no cost on UL's website at <https://www.ulstandards.com/IBR/logon.aspx>. Additionally, interested parties can purchase a copy of the UL standard from UL, 151 Eastern Avenue, Bensenville, IL 60106, Telephone: 1-888-853-3503 or online at: <http://ulstandards.ul.com/>. Finally, interested parties can schedule an appointment to inspect a copy of the standard at

CPSC’s Office of the Secretary, U.S. Consumer Product Safety Commission, 4330 East-West Highway, Bethesda, MD 20814, telephone: 301-504-7479; email: cpsecos@cpsec.gov.

V. Direct Final Rule Process

The Commission is issuing this rule as a direct final rule. Although the Administrative Procedure Act (APA; 5 U.S.C. 551-559) generally requires agencies to provide notice of a rule and an opportunity for interested parties to comment on it, section 553 of the APA provides an exception when the agency “for good cause finds” that notice and comment are “impracticable, unnecessary, or contrary to the public interest.” *Id.* 553(b)(B).

The Commission concludes that notice and comment are not necessary here because the Commission is taking the limited action of amending the GDO rule to conform the regulation to the relevant changes made to UL 325 that were previously accepted in October 2025 under the Improvement Act. Because this document merely updates the GDO rule to reflect the previously accepted changes to UL 325, the Commission considers this rulemaking to be a non-controversial matter that is not likely to generate comments. Public comment will not impact the acceptance of the substantive changes to UL 325 under the Improvement Act that has previously occurred. Additionally, public comments would not alter substantive changes to the standard or the effect of the revised standard as a consumer product safety standard under section 203(a) of the Improvement Act. Under these circumstances, notice and comment are

unnecessary. Therefore, the Commission concludes that the direct final rule process is appropriate.

In Recommendation 2024-6, the Administrative Conference of the United States (ACUS) endorses direct final rulemaking as an appropriate procedure to expedite rules that are noncontroversial and that are not expected to generate significant adverse comments. *See* 89 FR 106406 (Dec. 30, 2024). ACUS recommends that agencies use the direct final rule process when they act under the “unnecessary” prong of the good cause exemption in 5 U.S.C. 553(b)(B). 89 FR 106406, 106409. Consistent with the ACUS recommendation, the Commission is publishing this rule as a direct final rule, because CPSC does not expect any significant adverse comments.

Unless CPSC receives a significant adverse comment within 30 days of this notification, the rule will become effective on [INSERT DATE 60 DAYS AFTER DATE OF PUBLICATION IN THE FEDERAL REGISTER]. In accordance with ACUS’s recommendation, the Commission considers a significant adverse comment to be one where the commenter explains why the rule would be inappropriate, “including challenges to the rule’s underlying premise or approach,” or where the commenter explains why the rule would be ineffective or unacceptable without change. *Id.* at 106409. If the Commission receives a significant adverse comment, the Commission will withdraw any portion of this direct final rule related to such a comment. Depending on the comment and other circumstances, the Commission may then incorporate the adverse comment into a subsequent direct final rule or publish a notice of proposed rulemaking, providing an opportunity for public comment.

VI. Regulatory Flexibility Act

The Regulatory Flexibility Act (RFA; 5 U.S.C. 601-612) generally requires agencies to review proposed and final rules for their potential economic impact on small entities, including small businesses, and prepare regulatory flexibility analyses. 5 U.S.C. 603, 604. The RFA applies to any rule that is subject to notice and comment procedures under section 553 of the APA. *Id.* As discussed in section V. Direct Final Rule Process of this preamble, the Commission has determined that notice and the opportunity to comment are unnecessary for this rule. Therefore, the RFA does not apply. CPSC also notes the limited nature of this document, which merely updates the GDO rule to conform the regulation to the applicable changes made to UL 325 under the Improvement Act.

VII. Paperwork Reduction Act

The current mandatory standard for garage door operators includes labeling and instruction manual requirements that constitute a “collection of information,” as defined in the Paperwork Reduction Act (PRA; 44 U.S.C. 3501-3521). While the rule clarifies language regarding the description of products subject to the rule in the instruction manual section of the rule, the clarifications do not add to the burden hours because the products already require marking and labeling. Because the information collection burden is essentially unchanged, the revision does not affect the information collection requirements or approval related to the standard.

VIII. Effective Date

Because the changes to the entrapment protection requirements of the UL 325 standard are not substantial and the industry has had more almost a year since publication

of the revised UL 325 voluntary standard to come into compliance with its entrapment protection revisions, 60 days is sufficient for the effective date. Therefore, the effective date of the direct final rule is **[Insert date 60 days after publication in the FEDERAL REGISTER]**.

IX. Preemption

Section 203(f) of the Improvement Act contains a provision preempting under 15 U.S.C. 2075 those provisions of laws of States or political subdivisions which relate to the labeling of automatic residential garage door openers and those provisions which do not provide at least the equivalent degree of protection from the risk of injury associated with automatic residential garage door openers as the consumer product safety rule. 15 U.S.C. 2056 Note.

X. Environmental Considerations

Commission rules are categorically excluded from any requirement to prepare an environmental assessment or an environmental impact statement where they “have little or no potential for affecting the human environment.” 16 CFR 1021.5(c). This rule falls within the categorical exclusion, so no environmental assessment or environmental impact statement is required.

XI. Congressional Review Act and Executive Order 12866

Pursuant to the Congressional Review Act (CRA) and Executive Order (EO) 12866, the Office of Management and Budget’s Office of Information and Regulatory Affairs has determined that this rule does not qualify as a “major rule,” as defined in 5 U.S.C. 804(2), and is not a significant regulatory action as defined under section 2(f) of

EO 12866. To comply with the CRA, CPSC will submit the required information to each House of Congress and the Comptroller General.

List of Subjects in 16 CFR Part 1211

Consumer protection, Imports, Incorporation by reference, Labeling, Reporting and recordkeeping requirements.

For the reasons set forth in the preamble, the Commission amends 16 CFR part 1211 as follows:

**PART 1211—SAFETY STANDARDS FOR AUTOMATIC RESIDENTIAL
GARAGE DOOR OPERATORS**

1. The authority citation for part 1211 continues to read as follows:

Authority: 15 U.S.C. 2056 Note; 15 U.S.C. 2063 and 2065.

SUBPART A – [Amended]

2. Amend § 1211.4 by revising paragraph (c) to replace “UL 325-2017” with “UL 325-2025”.

3. Amend 1211.4 to add a new paragraph (d) to read as follows:

§ 1211.4 General requirements for protection against risk of injury.

* * * * *

(d) * * *

These requirements also cover battery-powered operators, including operators with battery back-up systems, with user-replaceable and/or non-user battery subject to the requirement of § 1211.7 and the applicable requirements of Supplement SC of UL 325-2025 (incorporated by reference, see § 1211.40).

* * * * *

4. Amend § 1211.5 by revising paragraph (c) to replace “UL 325-2017” with “UL 325-2025”.

5. Amend § 1211.7 by adding new paragraphs (b)(11), (b)(12), (c)(11), and (c)(12) to read as follows:

§ 1211.7 Inherent primary entrapment protection requirements.

* * * * *

(b) * * *

(11) An operator employing a battery back-up system shall operate as specified in paragraphs (b)(1), (b)(2), and (b)(3) of this section, as applicable; or the operator is rendered inoperative (any case in which the operator will not complete a full cycle, open, and close, of travel) when tested in accordance with paragraph (b)(12) of this section and the applicable requirements of Supplement SC of UL 325-2025 (incorporated by reference, see § 1211.40).

(12) Compliance with paragraph (b)(11) of this section shall be verified with a fully charged battery, and then with the same battery after it has been discharged per the manufacturer’s recommendations to the operator’s lowest operational voltage.

* * * * *

(c) * * *

(11) An operator employing battery back-up system shall operate as specified in (c)(1), (c)(2), and (c)(3) of this section as applicable; or the operator is rendered inoperative (any case in which the operator will not complete a full cycle, open and close, of travel) when tested in accordance with paragraph (b)(12) of this section and the applicable

requirements of Supplement SC of UL 325-2025 (incorporated by reference, see § 1211.40).

(12) Compliance with (c)(11) of this section shall be verified with a fully charged battery, and then with the same battery after it has been discharged per the manufacturer’s recommendations to the operator’s lowest operational voltage.

* * * * *

6. Amend § 1211.8 by revising paragraph (c) to delete the phrase “and correct operation”.

7. Amend § 1211.8 by revising paragraph (f) to read as follows:

§ 1211.8 Secondary entrapment protection requirements.

* * * * *

(f) * * *

An inherent secondary entrapment protection device described in § 1211.6(b)(3) shall comply with the applicable requirements in § 1211.13, independent of the primary entrapment protection. The independent primary and secondary entrapment protection devices shall not use the same detection means nor measure the same physical properties. Software used in an inherent secondary entrapment protection device shall comply with UL 1998 (incorporated by reference, see § 1211.40).

* * * * *

8. Amend § 1211.16 by revising paragraphs (a)(2), (3), and (10)(i) to read as follows:

§ 1211.16 Instruction manual.

* * * * *

(a) * * *

(2) Instructions that clearly detail installation and adjustment procedures required to effect proper operation of the safety means provided shall be provided with each door operator (or system).

(3) A residential garage door operator or system shall be provided with complete and specific instructions for the correct adjustment of the control mechanism and the need for periodic checking and, if needed, adjustment of the control mechanism so as to maintain satisfactory operation of the door.

* * * * *

(10)(i) Residential garage door operators (or systems), instructions of this section, as applicable.

* * * * *

SUBPART D – [Amended]

8. Amend § 1211.40 by revising paragraph (d)(1) to read as follows:

* * * * *

(d) * * *

(1) UL 325, Standard for Safety: Door, Drapery, Gate, Louver, and Window Operators and Systems, SUPPLEMENT SA—(Normative)—UL 60335-1/CAN/CSA-C22.2 No. 60335-1 Based Requirements for the Evaluation of Electronic Circuits and SUPPLEMENT SC—(Normative)—BATTERY-POWERED APPLIANCES, Seventh Edition, September 15, 2025, into §§ 1211.4, 1211.5, and 1211.7.

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Alberta E. Mills,
Secretary,
U. S. Consumer Product Safety Commission