



11/16/2023

Tim Corder  
Chair STP 325, UL Technical Committee  
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Dear Mr. Corder:

Based on the U.S. Consumer Product Safety Commission's (CPSC) injury and death incident data involving awnings and related CPSC Compliance activities, CPSC staff is concerned that absent appropriate safeguards, motorized awnings can open suddenly and forcefully, presenting a hazard for consumers.

Recent incidents have resulted in consumers being killed or seriously injured from being impacted by awnings, such as from being knocked off a ladder and/or a deck.

[SunSetter Recalls Vinyl Covers for Motorized Awnings Due to Impact and Fall Hazards; One Death Reported \(Recall Alert\) | CPSC.gov](#)

[SaferProducts.gov](#)

CPSC staff is also aware of congressional interest in this issue. Because of these issues, CPSC staff requests that the UL STP 325 add performance requirements to the UL 325 safety standard to address awnings unexpectedly opening and striking consumers.

CPSC staff also suggests adding requirements under the heading: "PROTECTION AGAINST RISK OF INJURY TO PERSONS," possibly in Section 28, "Moving Parts."

CPSC staff has drafted the following criteria for consideration to be incorporated into UL 325 to address a hidden hazard posed by residential motorized retractable awning products.

#### Residential Exterior Awnings:

All residential exterior fixed motorized retractable awnings and residential exterior freestanding motorized retractable awnings:

- (1) Shall have at least one conspicuous visual alert that is active whenever the awning is closing and opening.
- (2) Shall have an audible alarm alert, rated at about 50 decibels (dB) or greater but less than 85 dB, that is active any time the awning is closing and opening.
- (3) Shall not unexpectedly open.
- (4) Shall not open at a rate greater than 10% above the awning's "normal" opening speed.



In reviewing UL 325 safety standard, CPSC staff believes that these changes may warrant additional definitions added to the standard, such as:

**Conspicuous:** Clearly visible to the user as they operate the product in the manufacturer's intended use position.

**Unexpectedly Open:** Product opens when it is reasonably foreseeable the user will not anticipate it to open.

CPSC staff appreciates the STP members considering the above recommendations to address the hazard cited above. CPSC staff is available to discuss further as needed at the next STP meeting. Further deaths and serious injuries can be prevented through safeguards developed to meet these requirements to prevent unexpected and forceful opening of motorized awnings.

Sincerely,  
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These comments are those of the CPSC staff, have not been reviewed or approved by, and may not necessarily reflect the views of, the Commission.