

# New UL 325 Requirements for CDOs Begin Aug. 29

## Questions and Answers for Dealers

By **Barbara Kelkhoff**,  
Regulatory Project Manager at Chamberlain  
Chair of the DASMA Operator & Electronics  
Door Operator Committee

All labeled and listed commercial/industrial door operators manufactured on or after Aug. 29, 2010, will incorporate entrapment protection changes mandated by new UL 325 regulations. Here are answers to some commonly asked questions for professional installing dealers.

### Haven't commercial/industrial door operators always required external entrapment protection devices?

Yes. However, the new requirements state that the operator must continuously monitor the external entrapment protection device so that the door cannot be started down unless the device is properly functioning.

### How is this different from the previous requirements?

Previous revisions of UL 325 required an external entrapment protection device if the operator was controlled by anything other than a three-button station in sight of the door. These other controls could be items such as a timer-to-close or a radio control. However, proper installation often depended on the installer to ensure that all acceptable entrapment protection devices were connected.

### Will any edge sensor or photoeye work?

Some may; some may not. Check the manufacturer's instructions for the devices that have been approved for each operator. Acceptable devices must be detailed in the instruction manual. The UL 325 listing is dependent on the testing of each operator with each of the acceptable entrapment protection devices.

### What about product in stock that was manufactured prior to Aug. 29, 2010?

Operators labeled and listed prior to Aug. 29 can continue to be sold and installed, provided that they are in stock at a dealer, distributor, or manufacturer's warehouse. The new provisions of UL 325 apply to operators manufactured on or after Aug. 29. Monitor local and national codes that may restrict the use of pre-Aug. 29 operators.

### If the entrapment protection device is broken, will my customers lose control of the door?

No. The new standard allows the operator to revert to constant-pressure control to close the door. In addition, if the external device is not working, portable transmitters or automatic timer control devices will only work to open the door. They will not be able to close the door until the entrapment protection device is working again.

### At what height must I install the photoeyes?

The primary photoeye devices must be installed no higher than 6" off the floor. If more protection is necessary, additional photoeyes can be mounted at other heights.

## UL325 2010 REQUIREMENTS

### MOST SIGNIFICANT AMENDMENT - ENTRAPMENT PROTECTION

- A Commercial/Industrial door operator shall comply with one of the following:
- (1) The primary entrapment protection device shall be a three-button station in sight of the door.
  - (2) The primary entrapment protection device shall be a timer-to-close device.
  - (3) The primary entrapment protection device shall be a radio control device.
  - (4) The primary entrapment protection device shall be a photoeye device.
  - (5) The primary entrapment protection device shall be a pressure sensitive device.
  - (6) The primary entrapment protection device shall be a device that provides continuous monitoring of the door.

### EXTERNAL ENTRAPMENT PROTECTION - CLASSIFICATIONS & EXAMPLES

- Primary (Mandatory) External Entrapment Devices:**
- (1) A three-button station in sight of the door.
  - (2) A timer-to-close device.
  - (3) A radio control device.

- Secondary (Optional) External Entrapment Devices:**
- (1) A photoeye device.
  - (2) A pressure sensitive device.

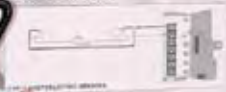
### SPECIAL COMMERCIAL DOOR OPERATORS

—Demp Environment, NA, 048

### LOGIC 4.0



### MEDIUM DUTY LOGIC



**LiftMaster**  
Commercial Door Operators



**“Use these opportunities to educate the consumer on the safety features and benefits of UL 325-2010-compliant operators.”**

**Barbara Kelkhoff**

**Does this mean that I can now install a commercial/industrial door operator on a residential door if external devices are monitored?**

No. The commercial/industrial door operator requirements do not address all the UL 325 safety systems required for residential door operators, such as an inherent reversal system and a 30-second maximum run timer or position detection system. If the operator is not listed to both commercial/industrial and residential requirements, it cannot be installed in a residential application. The UL 325 definition for residential is “a residential building of one to four single family units.” Any locations exceeding the number of units in that definition fall under the commercial/industrial category.

**What about repairs to older operators? Is this allowed?**

Yes, repairs to operators that comply with previous versions of UL 325 are still permitted. However, use these opportunities to educate the consumer on the safety features and benefits of UL 325-2010-compliant operators.

**What other changes will I see with these new operators?**

- Operators meeting the new requirements will include an improved warning placard to be installed near the controls used to operate the system. This placard follows the ANSI guidelines to warn the user of the hazards associated with a moving door.
- If a 3-button control station is provided, at least one of those buttons must be a STOP button. The instructions for the operator will state that control stations are to be located far enough away from the door so the user will not come in contact with the door while it is moving.
- For horizontally sliding doors with an open construction, the door must be guarded or screened up to 4' from above ground to prevent a 2-1/4" sphere from passing through any opening in the door.  
Remember to instruct the customer to do a monthly check to verify that the safety devices are working properly. Doors must be kept properly operating and balanced. An improperly operating or unbalanced door could cause severe injury or death. ■

**Your **RE-SOURCE** for Flood Vents FOR GARAGE DOORS**

- FEMA Elevation Certificate requires evidence that flood prone enclosed areas are vented properly to permit hydrostatic water pressure equalization
- Each Smart Vent® protects up to 200 Sq. Ft. of area below the Base Flood Elevation (BFE). Use fewer vents, and improve home protection
- Flood Insurance rates increase dramatically if no vents or non-compliant vents are used in areas below the BFE
- ICC-ES Evaluated, FEMA Accepted and approved by the Florida Building Code Commission



Insulated and Dual Function models available



Re-Source Industries, Inc. ■ Fort Worth, Texas ■ TOLL-FREE Order Line: 1-866-316-7337 ■ [www.re-sourceind.com](http://www.re-sourceind.com) ■ FAX 817-222-9950