



**DASMA**  
Door & Access Systems  
Manufacturers Association  
International

DOOR OPERATOR & ELECTRONICS DIVISION

# TECHNICAL DATA SHEET

## #351

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## Federal and State Residential Garage Door Operator Legislation Guidelines For Dealers and Installers

Following are some questions asked by dealers and installers about federal and state laws related to residential garage door operators (GDO's). Many of these laws changed effective January 1, 1993, and affect the way you do business now and in the future.

Federal law 16 CFR 1211 requires that residential GDO's manufactured on and after January 1, 1993 must:

1. Have an inherent primary entrapment protection (automatic inherent reverse feature) that reverses within 2 seconds upon contacting an obstruction;
2. Have an inherent entrapment protection system that either
  - a. Monitors the actual position of the door at increments 1 inch or less, and reverses the door in the event the position of the door is different than the expected parameters, or
  - b. Includes a 30 second reverse timer that moves the door upward 30 seconds after sensing the door has not reached the fully closed position;
3. Have a secondary entrapment protection system that either
  - a. Has an attached and working external entrapment device (example: edge sensor or photoelectric eye), or
  - b. Has an inherent secondary entrapment system (example: combination sectional door and operator system with the entire door system acting as a force sensing device)
4. Close the door using
  - a. A wall switch
  - b. A push button remote control, or
  - c. Other unattended operation feature such as timer-to-close or internet controls provided the feature complies with necessary rules for such devices

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This Technical Data Sheet was prepared by the members of DASMA's Operator & Electronics Division Technical Committee. DASMA is a trade association comprising manufacturers of rolling doors, fire doors, grilles, counter shutters, sheet doors, and related products; upward-acting residential and commercial garage doors; operating devices for garage doors and gates, sensing devices, and electronic remote controls for garage doors and gate operators; as well as companies that manufacture or supply either raw materials or significant components used in the manufacture and installation of the Active Members' products.

May I Continue to Purchase, Sell and Install Old Units?

The federal law applies only to the manufacture of residential units beginning in 1993. It does not prohibit you from purchasing, selling or installing older GDO's; however, all dealers and installers are also affected by state and local laws and court rulings, which may include civil penalties for installations found to be non-compliant. Laws and rulings differ from state to state, some of which are briefly summarized below:

- Minnesota (Minnesota 325F.82-83) and New York (NY GBS Article 26, 391-K): On and after January 1, 1993, you may not sell, purchase or install a GDO for a single or multi-family residence in Minnesota or New York unless it complies with the new standards.
- California (CA Health and Safety Code section 19890-19892): Since January 1, 1991, you may not sell, purchase or install a GDO for a single or multifamily residence in California unless it complies with the new standards. In addition, since January 1, 1993, you may not sell, purchase or install a GDO for a single or multifamily residence in California unless, in order to operate, it requires the inclusion of a tactile garage door edge sensor, an optical sensor, or a similar device that when activated is designed to cause the closing door to open and prevent an open door from closing. Under the California statute, a GDO manufactured prior to January 1, 1993, and that was in the possession of a retailer or wholesaler on January 1, 1993, may have been purchased, sold, offered for sale, and installed on or before July 1, 1993, provided the GDO was in compliance with the new standards in effect as of January 1, 1993.
- Indiana (IC 24-5-18): You may not install a GDO for a residence in Indiana unless it has the automatic reverse feature and 30-second reverse timer. This requirement took effect January 1, 1993.
- All Other States: As of this time, we are not aware of any other states having specific installation requirements, but your city or county may. Check with your attorney. In addition to any specific GDO laws, each state has general product liability laws and court rulings that may affect your decision on what to install.

You should note that *DASMA does not support the installation of non-compliant or "old" products*, even if there is no state regulation outlawing such products. Supporting this assertion is the knowledge that compliance to the new regulations reduces injuries.

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How do I know if a GDO complies with the New Standard?

For residential units manufactured before January 1, 1993, consult your distributor or manufacturer to find out how to identify the new units.

For residential units manufactured after January 1, 1993, look for the following:

- a. a label showing a manufacture date on or after Jan. 1, 1993 and the listing agency logo; or
- b. a label showing a manufacture date on or after Jan. 1, 1993 and stating that the unit is manufactured in accordance with UL 325 or federal standards.

Different manufacturers will use different labels. When in doubt, check with your distributor or manufacturer.

Am I Permitted To Repair Existing GDO's That Do Not Comply With The New Requirements?

Currently, there are no federal laws that prohibit repair of non-compliant existing GDO's. You should check your state and local laws that may govern this issue. *DASMA does not support the installation of non-compliant or "old" products*, even if there is no state regulation outlawing such products. Supporting this assertion is the knowledge that compliance to the new regulations reduces injuries.

You should advise the owner of the non-compliant GDO and ask the owner to consider replacing the existing GDO with one that meets the current safety requirements. You should mark in writing on the owner's work order the status of the existing GDO with respect to the new requirements and whether or not the owner decided to replace the GDO. The owner should sign the work order acknowledging the above.

When Should I Test the Automatic Reverse Feature?

Always test the GDO's automatic reverse feature whenever you install, service, or repair any GDO, garage door, or any hardware or remote controls. The testing and tagging procedure recommended by DASMA is described in the attached statement. This is for the customer's protection, and yours.

Testing and tagging are mandatory under California, New York, Minnesota and Indiana state laws. These laws are briefly described below; however, even if you are not in one of those states, you should always test the operator.

- California: When you are hired to service or repair a residential GDO (or to replace a garage door), you must test the operator for reversal on a 2-inch block (a wood 2x4 laid flat is acceptable) on the floor in the center of the door. If the door does not reverse when it strikes the

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- block (or 2x4), it does not meet the test. You must place a red warning tag on the unit. There is a specific form for the tag - ask your trade association or check the law for the required form.
- **Indiana:** When you are hired to service or repair a residential GDO, you must test the operator for reversal on a 2-inch block (a wood 2x4 laid flat is acceptable) on the floor in the center of the door. If the door does not reverse when it strikes the block (or 2x4), it does not meet the test. You must place an orange warning tag on the unit. There is specific information that must be on the tag, including the word "WARNING" in black on an orange background - ask your trade association or check the law for the required form. You must notify the occupant in writing within 10 working days that the unit is not in compliance. This law came into effect January 1, 1994.
  - **Minnesota:** When you are asked to service or repair a residential GDO, you must first test it to make sure it reverses on a 1-inch block within 2 seconds. If it does not, you may not service or repair. You must attach a red tag to units that do not pass this test - ask your trade association or check the law for the required form. You must also notify the occupant in writing within 10 working days that the unit is not in compliance.
  - **New York:** When you are asked to service or repair a residential GDO, you must first test it to make sure it reverses on a 1-inch block within 2 seconds. If it does not, you may not service or repair. You must attach a red label to units that do not pass this test - ask your trade association or check law for the required form. You must also notify the occupant in writing within 10 working days that the unit is not in compliance.

Please note that the materials given to the customer often recommend that the customer test by using a wood 2 x 4 laid flat; however, in New York and Minnesota, different test procedures apply to the installer or service personnel.

#### Do I Need to Leave Any Materials with the Customer?

You should always leave a full set of the manufacturer's written materials with the customer when you install any GDO. California law specifically requires this, and DASMA recommends that dealers and installers in all states follow this practice. Even on a service call, ask customers if they have the owner's manual. If not, advise them to get a copy from the manufacturer.

You should also put up any wall labels and use safety brochures provided by the manufacturer with the product. These help remind the customer of the risk of entrapment and the need to regularly test the door. Extra wall labels and brochures may be obtained from DASMA or the International Door Association (IDA). You should use the pamphlet and wall label as an opportunity to educate the customer on the proper use, maintenance and testing of the GDO. This is for customer's protection, and yours.

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Customers can get a free safety brochure by calling 1-800-276-3919 or by accessing the brochure at [www.dasma.com](http://www.dasma.com). If you do not have a supply, you should suggest that the customer call or access the web for this free information.

### What Do I Do about Commercial and Industrial Operators?

When installing commercial or industrial door operators, the safety devices used should be appropriate for the application. Commercial or industrial operators can never be installed in a single family residence without first complying with regulations of UL 325 regarding residential operators. If a residential installation requires commercial/industrial duty equipment, consult the operator manufacturer for operators suitable for both residential and commercial/industrial needs. When servicing commercial/industrial operating systems, test all safety devices and document the results of the test, just as you would with a residential unit. California, New York, Indiana and Minnesota have laws that include specific requirements for operators. If you work in one of those states, check with your attorney.

**THIS IS A BRIEF SUMMARY FOR YOUR REFERENCE. IT IS NOT DETAILED OR COMPLETE, AND DOES NOT CONSTITUTE LEGAL ADVICE. CONSULT WITH YOUR ATTORNEY FOR MORE DETAILS.**

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## STATEMENT OF TESTING FOR AUTOMATIC REVERSE FEATURES OF GARAGE DOOR OPERATORS

The Door & Access Systems Manufacturers Association (DASMA) has prepared the following statements for dealers regarding the testing of automatic reverse features for garage door operators upon each installation, service or repair:

1. Garage doors and garage door operators should be installed, maintained, tested and operated in accordance with the instructions contained in the owner's manual.
2. All instructions included by the manufacturer with the operator must be left with the customer upon completion of any installation. A receipt should be obtained for your records.
3. All garage door operators manufactured on or after January 1, 1991 must be in compliance with the automatic reverse requirements for garage door operators, as published by Underwriter's Laboratories in UL 325. All garage door operators manufactured on or after January 1, 1993 must be in compliance with the secondary entrapment device requirements (such as the use of photoelectric sensors or edge sensors) for garage door operators, as published by Underwriters Laboratories in UL 325. To make sure the operator you are installing is in compliance, look for the UL listing mark, or other listing mark or statement that indicates the operator is in compliance with the UL 325 reversing requirements.
4. Each time you are called upon to install or service a garage door operator, garage door, or related components, you should always test the garage door operator to ensure that it automatically reverses off of a 1 inch or 2 inch block (see manufacturer's instructions) placed flat under the center of the door. You should document that the test was performed, and retain the document in your permanent records. The customer should be advised to repeat this test every month.
5. If a garage door operator cannot be adjusted to reverse on a 1 inch or 2 inch obstruction as described above, the customer should be advised verbally and in writing that the operator as tested on site does not comply with the current federal standard for new operators and that the garage door operator (or, if necessary to make the operator work correctly, the door or related components) should be repaired or replaced. You should document this advice, obtain a receipt from the customer showing the customer received the advice and the document, and retain the document in your permanent records.

THESE GENERAL GUIDELINES ARE FOR YOUR ASSISTANCE IN EDUCATING CUSTOMERS AND TESTING OPERATORS FOR AUTOMATIC REVERSE FEATURES. THEY DO NOT PURPORT TO BE EXHAUSTIVE OR COMPLETE, OR TO BE A SUBSTITUTE FOR DOOR INSTALLATION AND REPAIR PRACTICES. THE RECOMMENDED TEST DOES NOT PURPORT TO ENSURE COMPLETE COMPLIANCE WITH UL STANDARDS - THAT CAN ONLY BE DONE IN A LABORATORY. STATE, AND LOCAL LAWS MAY CONTAIN ADDITIONAL OR DIFFERENT REQUIREMENTS, SO PLEASE CONSULT YOUR ATTORNEY.

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If you have any questions concerning these guidelines, please contact the manufacturer of the garage door operator. For further information, you may contact DASMA at (216) 241-7333 or via e-mail at [dasma@dasma.com](mailto:dasma@dasma.com).

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