



DASMA
Door & Access Systems
Manufacturers Association
International

GATE OPERATOR & ACCESS CONTROL POINT SYSTEMS DIVISION

TECHNICAL DATA SHEET

#384

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Garage Door Operator Wall Control Button Mounting Height ADA Requirements and UL 325

Introduction

The instructional requirements in UL 325 (Standard for Door, Drapery, Gate, Louver, and Window Operators and Systems) state that a garage door operator wall control button is to be mounted a minimum of 5 feet above floors or other walking surfaces, to help prevent children from accessing the control. Occasionally, individuals have requested a deviation from the mounting height requirement in order to accommodate and comply with requirements in the Americans with Disabilities Act (ADA). The ADA states that controls, in general, should be mounted no more than 48 inches above the walking surface, with a maximum 10-inch obstruction from the mounting surface. This Technical Data Sheet provides some options for navigating this seemingly conflicting language.

Alternatives to mounting height language

Before the applicable mounting height is determined, the following questions should be asked:

- Is this door considered an "egress" door? Egress is defined as exiting the inside of a building by a user (other than emergency personnel) opening a door. Typically, the ADA requirements apply to egress doors. Such egress doors have special requirements involving "break out" features, minimum operating forces, and allowable door types. (NOTE: It is highly unlikely that a garage door would be an egress door.)
- Does this door have a portable transmitter which will ease operation for the disabled? The transmitter would need to be readily available to the user.
- Does this door have a mounted keypad to ease operation for the disabled? The code would need to be readily available to the user.
- Can this door be operated by a cell phone app? The user would need to have a cell phone with the app installed.

Note: Technical Data Sheets are information tools only and should not be used as substitutes for instructions from individual manufacturers. Always consult with individual manufacturers for specific recommendations for their products and check the applicable local regulations.

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.

Residential installations: 16 CFR 1211 and ADA

Since 1993, federal law (16 CFR 1211) has required that residential garage door operators comply with specific requirements of UL 325. ADA requirements do not apply to single family residences. If the ADA requirement is being enforced in single family residences, the installer should have the building owner sign a document that

- 1) specifies the *actual* installed wall control button mounting height above the walking surface, and
- 2) acknowledges that the height is not in compliance with the manufacturer's instructions, the UL 325 standard, and the local law(s).

Commercial installations

The federal law governing residential operators does not apply to commercial door operators. Instead, commercial door operators are regulated through the adoption and enforcement of any one or combination of the following:

- 2012 (and later) International Building Code,
- a local ordinance,
- an electrical code,
- an applicable OSHA requirement,
- a job specification,
- an insurance related requirement, or
- building occupant/owner request.

At any time, any one of these may include a requirement for UL 325 compliance. When the ADA requirement is being enforced in a commercial installation, the installer should have the builder/contractor sign a document that

- 1) specifies the *actual* installed wall control button mounting height above the walking surface, and
- 2) acknowledges that the height is not in compliance with the manufacturer's instructions, the UL 325 standard, and the local law(s).

Conclusion

For both residential and commercial installations involving a request for an ADA-compliant mounting height of a garage door operator wall control button, it would be advisable for the installing dealership to have the building owner or builder/contractor expressly acknowledge in writing that the building owner or the structure's builder/contractor acknowledges and assumes responsibility for the modified, non-compliant mounting height.

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