SCALE MANUFACTURERS ASSOCIATION

P.O. Box 26972 – Columbus, Ohio 43226-0972
Tel: 866-372-4627 Email: info@scalemanufacturers.org
Web Site: www.scalemanufacturers.org

SMA Positions on the NCWM Specifications and Tolerances Committee 2017 Interim Meeting Agenda

NCWM Interim Meeting, January, 2017

3100 GENERAL CODE

3100-1 G-S.5.2.2. Digital Indication and Representation (Related items 3200-5 and 3600-2)

Position: The SMA opposes this item.

Rationale: This item would restrict the use of multiple scales operating using internal resolution to create an additional scale that provides the total weight value.

3100-2 G-UR.3.3. Position of Equipment

Position: The SMA opposes this item as written.

Rationale: The item does not provide clarification to existing requirements for visibility, and could have overreaching impacts to existing installations for various device types.

3200 SCALES CODE

3200-1 S.1.2. Value of Scale Division Units and Appendix D – Definitions: batching scale

Position: The SMA opposes this item.

Rationale: Currently there are no specifications and tolerances defined to support the definition of either “batching scale” or “batching system.” The SMA feels that the proposed item is actually two separate items and should be split apart as such.

3200-2 S.1.2.2. Verification Scale Interval

Position: The SMA supports this item with clarification of “d” vs. “e” within the proposed paragraph S.1.2.2.2.

Rationale: The concept of “d” and “e” appears to be reversed in the proposal. The SMA further recommends that the adoption date be changed to non-retroactive as of January 1, 2020 if adopted.

3200-3 S.1.8.5. Recorded Representations, Point of Sale Systems and S.1.9.3. Recorded Representations, Random Weight Package Labels

Position: The SMA opposes this item.

Rationale: The SMA feels that the implementation cost of the proposal would have a significant impact to the manufacturers, retailers, and ultimately consumers while providing minimal benefit.

3200-4 Table 3, Parameters for Accuracy Classes (Related item 3200-8)

Position: The SMA takes no position on these items at this time.

Rationale: This is a significant change to the code and the impacts are not fully known. The proposal introduces new classes and changes the concept of a scale being comprised of an NTEP-certified indicator, a weighing/load receiving element, and loadcell(s). The SMA looks forward to the review and input from other interested stakeholders.

3200-5 Table 3, Parameters for Accuracy Classes (Related items 3100-1 and 3600-2)

Position: The SMA opposes this item as written.

Rationale: This item would restrict the use of multiple scales operating using internal resolution to create an additional scale that provides the total weight value.

3200-6 N.1. Test Procedures

Position: The SMA supports this item with the following changes:

Recommendation: The SMA recommends removing the proposed language shown in N.1.1. and N.1.2. In addition, we recommend creating a new subsection N.1.3.X for the proposed paragraph currently listed under N.1.3.2 Equal Arm Scales.

3200-7 T.1. General and T.N.2.1. General (Related items 3201-1, 3204-1, 3205-1, 3508-2, 3509-1 and 3600-4)

Position: The SMA takes no position on this item at this time.

3200-8 T.N.3.6. Coupled-in-Motion Railroad Weighing Systems (Related item 3200-4)

Position: The SMA takes no position on these items at this time.

Rationale: This is a significant change to the code and the impacts are not fully known. The proposal introduces new classes and changes the concept of a scale being comprised of an NTEP-certified indicator, a weighing/load receiving element, and loadcell(s). The SMA looks forward to the review and input from other interested stakeholders.

3201-1 T.1. Tolerance Values (Related items 3200-7, 3204-1, 3205-2, 3508-2, 3509-1 and 3600-4)

Position: The SMA takes no position on this item at this time.

3202-1 D - A. Application, S Specifications, N. Notes, UR. User Requirements

Position: The SMA takes no position on this item at this time and looks forward to additional analysis performed by the appropriate stakeholders.

3204-1 T.N.2.1. General (Related items 3200-7, 3201-1, 3205-2, 3508-2, 3509-1 and 3600-4)

Position: The SMA takes no position on this item at this time.

3205-1 A. Application. and Sections Throughout the Code to Address Commercial and Law Enforcement Applications

Position: The SMA takes no position on this item at this time and looks forward to recommendations from the Weigh In Motion Task Group.

3205-2 T.1.1. Design (Related items 3200-7, 3201-1, 3204-1, 3508-2, 3509-1 and 3600-4)

Position: The SMA takes no position on this item at this time.

3500 MULTIPLE DIMENSION MEASURING DEVICES CODE

3508-1 S.1.7. Minimum Measurement Lengths and S.1.8. Indications Below Minimum and Above Maximum

Position: The SMA supports the adoption of this item.

3508-2 T.3. Tolerance Values (See also items 3200-7, 3201-1, 3204-1, 3205-1, 3509-1 and 3600-4)

Position: The SMA takes no position on this item at this time.

3600 OTHER ITEMS

3600-2 Appendix A – Fundamental Considerations: Section 4.4. General Considerations (Related items 3100-1 and 3200-5)

Position: The SMA opposes this item.

Rationale: This item would restrict the use of multiple scales operating using internal resolution to create an additional scale that provides the total weight value.

3600-3 Appendix D – Definitions: Batching System

Position: The SMA opposes this item.

Rationale: Currently there are no specifications and tolerances defined to support the definition of either “batching scale” or “batching system.” The SMA feels that the proposed item is actually two separate items and as such should be split apart.

3600-4 Appendix D – Definitions: overregistration and underregistration (Related items 3200- 7, 3201-1, 3204-1, 3205-2, 3508-2 and 3509-1)

Position: The SMA takes no position on this item at this time.

3600-5 D Appendix D – Definitions: Remote Configuration Capability

Position: The SMA opposes this item.

Rationale: The SMA has concerns about changing sealable parameters without proper re-sealing.