



**SMA Positions on the
NCWM Specifications and Tolerances Committee Report
NCWM Interim Meeting, January, 2018**

3100 GENERAL CODE

GEN-3 G-A.1. Commercial and Law-Enforcement Equipment. and G-S.2. Facilitation of Fraud.

Position: The SMA supports the intent of the item, however, recommends that it be given a status of “Developing”.

Rationale: The SMA supports the proposed changes to G-A.1.(b), however the proposed changes to G-S.2 need additional consideration. Specifically:

- What is the definition of “access” i.e. what constitutes access?
- What is the definition of “master key, universal key, and universal tools”?

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

Removed

from Pub 15

Position: The SMA recommends the withdrawal of this item.

Rationale: The submitter has requested this item be withdrawn.

3200 SCALES CODE

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

Removed

from Pub 15

Position: The SMA recommends the withdrawal of this item.

Rationale: The submitter has requested this item be withdrawn.

SCL-6 S.1.2.2.3. Deactivation of a “d” Resolution

Position: The SMA takes no position on this item.

Rationale: The SMA believes the requirements for this item are already covered in Handbook 44.

SCL-7 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: Since regulators verify that the tare values in POS systems are accurate, the SMA feels that the proposal would provide little or no benefit to the consumer.

SCL-1 Table 3, Parameters for Accuracy Classes (Related item 3200-8)

Position: The SMA recommends the withdrawal of this item.

Rationale: The SMA feels this is an unnecessary change to the code.

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

Position: The SMA opposes this item as written.

Rationale: This proposal would not address the total scope of the changes necessary to eliminate ambiguity in the code. Changes in this area would require a more comprehensive approach. We suggest a Task Group be formed to further study this item and recommend Handbook 44 changes.

SCL-4 N.2. Verification (Testing) Standards (Related items New-7 and New-8)

Position: The SMA recommends this item be given a Developing status.

Rationale: It is important to be consistent in our use of terms across multiple sections of Handbook 44.

SCL-2 T.N.3.6. Coupled-in-Motion Railroad Weighing Systems (Related item 3200-4)

Position: The SMA recommends the withdrawal of this item.

Rationale: The SMA feels this is an unnecessary change to the code.

SCL-8 Sections Throughout the Code to Include Provisions for Commercial Weigh-in-Motion Vehicle Scale Systems

Position: The SMA opposes the item as written.

Rationale: The SMA appreciates the work that the WIM Task Group has done thus far. Feedback from the regulatory community (on the White Paper produced by the WIM Task Group) is needed to help solve the issues related to tolerance and testing methods.

ABW-3 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.

ABW-4 A. Application and Appendix D: Definitions – batching system

Position: The SMA opposes this item.

Rationale: Batching systems are not commercial devices and therefore should not be included in Handbook 44.

ABW-1 N.2. Verification (Testing) Standards (See related items New-6 and New-8)

Position: The SMA recommends this item be given a Developing status.

Rationale: It is important to be consistent in our use of terms across multiple sections of Handbook 44.

AWS-1 N.1.3. Verification (Testing) Standards, N.3.1. Official Tests, UR.4. Testing Standards (See related items New-6, New-7)

Position: The SMA recommends this item be given a Developing status.

Rationale: It is important to be consistent in our use of terms across multiple sections of Handbook 44.

3600 OTHER ITEMS

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

Position: The SMA opposes this item as written.

Rationale: This proposal would not address the total scope of the changes necessary to eliminate ambiguity in the code. Changes in this area would require a more comprehensive approach. We suggest a Task Group be formed to further study this item and recommend Handbook 44 changes.

OTH-6 Appendix D – Definitions: Batch (Batching)

Position: The SMA opposes this item.

Rationale: Batching systems are not commercial devices and therefore should not be included in Handbook 44.

GEN-2, SCL-5, BCS-1, ABW-2, AWS-2

D Appendix D – Definitions: Remote Configuration Capability

Position: The SMA is opposed to this item as written.

Rationale: It is not clear to the SMA if the requirements for the event counter would apply to removable storage devices located inside the equipment and protected by other security means.