



SCALE MANUFACTURERS ASSOCIATION

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SMA Positions on the NCWM Specifications and Tolerances Committee Report NCWM Interim Meeting, January, 2019

GENERAL CODE

BLOCK 1 ITEMS (B1) D TERMINOLOGY FOR TESTING STANDARDS

Position: The SMA supports the proposal as it applies to the items SCL-4, AWS-1, and ABW-1 items, and looks forward to acceptance from the other stakeholders.

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

BLOCK 3 ITEMS (B3) D ADDRESS DEVICES AND SYSTEMS ADJUSTED USING A REMOVABLE DIGITAL STORAGE DEVICE

Position: The SMA supports this item.

Rationale: The SMA appreciates the efforts of the Committee to address our previous concerns.

GEN-1 A GA.1. COMMERCIAL AND LAW-ENFORCEMENT EQUIPMENT. AND G-S.2. FACILITATION OF FRAUD

Position: The SMA is opposed to this item and recommends it be withdrawn.

Rationale: The SMA shares the concerns of the Conference regarding this issue, however we believe this topic is not within the scope of Weights and Measures.

GEN-3 G-S.8.1. MULTIPLE WEIGHING OR MEASURING ELEMENTS THAT SHARE A COMMON PROVISION FOR SEALING.

Position: The SMA is opposed to this item and recommends it be withdrawn.

Rationale: SMA feels there are other ways to address this issue, and the proposal would provide little or no benefit to the consumer.

GEN-4 G-T.5. TOLERANCES ON TESTS WHEN TRANSFER STANDARDS ARE USED., APPENDIX D – DEFINITIONS: STANDARDS, FIELD., TRANSFER STANDARD. AND STANDARD, TRANSFER.

Position: The SMA opposes this item as written for inclusion in the General Code section of Handbook 44.

Rationale: The SMA feels that this item is not fully developed. The proposal puts forth a definition for a Field Standard that applies to measuring devices, but omits other devices such as weighing equipment. If this definition is to be added to Handbook 44 in the General Code section, it should be inclusive of all device types that the handbook covers. In addition, the current Block 1 proposal should be taken under consideration to ensure it harmonizes with this proposal.

SCALES CODE

SCL-1 S.1.1.1. DIGITAL INDICATING ELEMENTS. AND UR.2.10. PRIMARY INDICATING ELEMENTS PROVIDED BY THE USER.

Position: The SMA supports the concept of a minimum size specification for the measurement units on electronic cash registers (ECRs) and point of sale (POS systems), but recommends the following changes:

~~(e) Except for electronic cash registers (ECRs) and point of sale systems (POS systems) on direct sale digital devices that display primary indications the numerical figures of the primary indications on the customer side must be at least 9.5 mm(0.4in.) in height. These indications must be NON-SCALABLE in font size.~~

~~[retroactive as of January 1, 20XX]~~

~~(d) (c) For electronic cash registers (ECRs) and point of sale systems (POS systems) the display of measurement units must be at least a minimum of 9.5 mm (0.4in.) in height. These indications must be NON-SCALABLE in font size.~~

~~[Nonretroactive as of January 1, 20XX]~~

UR.2.10. Primary Indicating Elements Provided by the User. – Electronic cash registers (ECRs) and point of sales systems (POS systems) where the primary ~~Primary~~ indicating elements that are not the same as the primary indicating elements provided by the original equipment manufacturer (e.g. video display monitors) shall comply with the following:

(a) On digital devices that display measurement units ~~primary indications~~ during direct sales to the customer, the numerical figures displayed to the customer shall be at least 9.5 mm (0.4 in) high.

Rationale: The SMA wanted to clarify what devices were impacted by the proposal. We felt the “non-scalable” provision was covered by the minimum size requirement and would have restricted the indication size from being made larger. We also felt the “retroactive” requirement would place an undue burden on device manufacturers and retailers.

SCL-2 A S.1.8.5. RECORDED REPRESENTATIONS, POINT OF SALE SYSTEMS

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-3 A SECTIONS THROUGHOUT THE CODE TO INCLUDE PROVISIONS FOR COMMERCIAL WEIGH-IN-MOTION VEHICLE SCALE SYSTEMS

Position: The SMA opposes the item as written and looks forward to the continued development of this item.

Rationale: The SMA appreciates the work that the WIM Task Group has done thus far, but believes that further work needs to be done regarding the testing methods to be used. Additional suggestions have been developed which should be considered.

SCL-6 UR.3.11. CLASS II SCALES

Position: The SMA takes no position on this item.

SCL-7 **T.N.3.6. COUPLED-IN-MOTION RAILROAD WEIGHING SYSTEMS., T.N.4.6. TIME DEPENDENCE (CREEP) FOR LOAD CELLS DURING TYPE EVALUATION., UR.5. COUPLED-IN-MOTION RAILROAD WEIGHING SYSTEMS. AND APPENDIX D – DEFINITIONS: POINT-BASED RAILROAD WEIGHING SYSTEMS.**

Position: The SMA opposes this item and recommends it be withdrawn.

Rationale: The current standards have been in effect for years, there are devices that comply with the current standards, and the SMA does not feel lowering the standard is in the best interest of the weights and measures community.

BCS – BELT-CONVEYOR SCALE

BCS-1 **S.1.3. VALUE OF THE SCALE DIVISION., S.1.9. ZERO-READY INDICATOR., S.4.ACCURACY CLASS., S.45. MARKING REQUIREMENTS., N.1. GENERAL., N.2. CONDITIONS OF TEST., T.1. TOLERANCE VALUES., T.2. TOLERANCE VALUES. AND UR.3. MAINTENANCE REQUIREMENTS – SCALE AND CONVEYOR MAINTENANCE.**

Position: The SMA supports this item.

ABW – AUTOMATIC BULK WEIGHING SYSTEMS

ABW-3 D **A. APPLICATION, S SPECIFICATIONS, N. NOTES, UR. USER REQUIREMENTS AND APPENDIX D – DEFINITIONS: AUTOMATIC BULK WEIGHING SYSTEM.**

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

AWS-3 **S.3.2. LOAD CELL VERIFICATION INTERVAL VALUE.**

Position: The SMA supports this item.

WIM-1 **TITLE OF TENTATIVE CODE, S.1.7.1. VALUES TO BE RECORDED., S.4.1. DESIGNATION OF ACCURACY., N.1. TEST PROCEDURES, T.2. TOLERANCE VALUES FOR ACCURACY CLASS A CLASSES., UR.1.1. GENERAL, TABLE 1. TYPICAL CLASS OR TYPE OF DEVICE FOR WEIGHING APPLICATIONS.**

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

MDM-2 **S.1.7. MINIMUM MEASUREMENT**

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

OTH-5 D **APPENDIX D – DEFINITIONS: BATCH (BATCHING)**

Position: The SMA takes no position on this item.

NTEP Administrative Policy

ADM-1 **Amend VCAP sections 21.1.3.1. and 21.1.3.6.**

Position: The SMA fully supports this item and recommends the NTEP committee adopts this item as written.

ADM-2 **Change VCAP Audit Frequency in Sections 3.2.16. and 3.7.10.**

Position: The SMA supports this item as proposed in the SMA Form 15. The SMA opposes the NTEP discussion points requiring that both audits be performed by the same auditor, and that the same auditor must be responsible for the decision to extend the audit time period.

Rationale: The existing NTEP Administrative Policy permits the audit time period to extend to five years based on "objective evidence", however no criteria is defined. The changes to the NTEP Administrative Policy proposed by the SMA define objective criteria, and should not require a subjective decision made by an auditor. Furthermore, we have concerns that the same auditor may not be available for consecutive audits due to various reasons. As long as NTEP accepts the auditor's reports and the company meets the SMA's proposed objective criteria, the extended audit period should be granted.