



December 11, 2017

To: Don Onwiler  
Executive Director  
National Conference on Weights and Measures  
1135 M Street, Suite 110 / Lincoln, Nebraska 68508  
[don.onwiler@ncwm.net](mailto:don.onwiler@ncwm.net)

Re: NCWM Proposed Updates and Harmonization of HB 130 Method of Sale (“MoS”) with HB 133 Test Procedure (“TP”) for Polyethylene Products

Mr. Onwiler:

Berry Global, Inc. (“Berry”), is in support of the below modifications to HB 130 MoS, under section 2.13, and harmonization with HB 133 TP, under section 4.5.2 (a) 2, as submitted on December 12, 2017, by NIST and Submitter of the proposal. Based on the clarifying examples, we believe this action is beneficial and is the least disruptive when compared to previous proposals for products we currently supply to the market. Just as we were grateful to be an active participant in past conferences, Berry greatly appreciates the opportunity to participate in discussions regarding our opinions of the newly proposed modifications.

**MoS Proposed Modification:**

**2.13.4. Declaration of Weight.** – The labeled statement of weight for polyethylene sheeting and film products under Sections 2.13.1.1. Sheeting and Film, and 2.13.3.1. Bags, shall be equal to or greater than the weight calculated by using the formula below. ~~The final value shall be calculated to four digits and declared to three digits, dropping the final digit as calculated (for example, if the calculated value is 2.078 lb, then the declared net weight shall be 2.07 lb).~~

**(a)** For values, less than 453.6 kg (1000 lb), the final value shall be calculated to at least four digits and declared to three digits, truncating the final digits as calculated (e.g., a calculated value of 943.1 g [2.079 lb] is truncated to 943 g [2.07 lb]), a calculated value of 14.92 kg (32.89 lb) is truncated to 14.9 kg (32.8 lb), a calculated value of 124.4 kg (274.2 lb) is truncated to 124 kg (274 lb).

**(b)** For values of 453.6 kg (1000 lb) or more, the final value shall be calculated to at least five digits and declared to four digits, truncating the final digits as calculated (e.g., a calculated value of 570.44 kg [1257.6 lb] is truncated to 570.4 kg [1257 lb]).

(Amended 20XX)



**TP Proposed Modification:**

Same language as above in bold as referenced in 2.13.4 (a) and (b) that will be harmonized into HB 133 4.5.2 (a) 2 and 4.5.2 (a) 3:

Use the following formulas to compute a target net weight. The labeled weight should equal or exceed the target net weight or the package is not in compliance **and shall be considered a HB130, Uniform Method of Sale, Section 2.13. Polyethylene Product violation.**

Sincerely,

A handwritten signature in black ink that reads "Matthew Kelly".

Matthew Kelly  
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