



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 Report For the NCWM Annual Meeting, July 2019

GENERAL CODE

GEN-1 I G-A.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Position: The SMA is opposed to this item and recommends it be withdrawn.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 A 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.

SCALES CODE

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

Position: The SMA supports this item.

Rationale: The SMA appreciates that the language changes we previously recommended were incorporated into this item by the S&T committee.

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.

Rationale: Insufficient test data has been provided by the WIM Task Group and there has been no response to Metter-Toledo's and NIST's suggested test procedures. Additionally, no further development work has been done by the WIM Task Group in over one year.

SCL-6 D UR.3.11. CLASS II SCALES

Position: The SMA opposes the item as written.

Rationale: The proposal as written may conflict with regulations from other agencies, such as USDA Grain Inspection Manual, Paragraph 1.16, Laboratory Scales.

SCL-7 V 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 V 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, however we have concerns regarding the reference scale's ability to weigh material to an accuracy of 0.035% as stated in the proposed paragraph N.3.2.1 (b), Accuracy of Material.

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.

AWS – AUTOMATIC WEIGHING SYSTEMS

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

Position: The SMA supports this item.

WIM – WEIGH-IN-MOTION SYSTEMS USED FOR VEHICLE ENFORCEMENT SCREENING TENTATIVE CODE

- WIM-1 D 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 submitter.

**BLOCK 1 ITEMS (B1)
TERMINOLOGY FOR TESTING STANDARDS**

- B1:SCL-4 A N.2. VERIFICATION (TESTING) STANDARDS**
- B1:ABW-1 A N.2. VERIFICATION (TESTING) STANDARDS**
- B1:AWS-1 A N.1.3. VERIFICATION (TESTING) STANDARDS, N.3.1.
OFFICIAL TESTS, UR.4. TESTING STANDARDS**

Position: The SMA supports the proposal as it applies to the items SCL-4, ABW-1, and AWS-1 items, and looks forward to further development by the Task Group.

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

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

- B3:GEN-2 V G-S.8.2 DEVICES AND SYSTEMS ADJUSTED USING
REMOVABLE DIGITAL DEVICE STORAGE**
- B3:SCL-5 V S.1.11. PROVISION FOR SEALING**
- B3:BCS-1 V S.5. PROVISION FOR SEALING**
- B3:ABW-2 V S.1.6. PROVISION FOR SEALING ADJUSTABLE
COMPONENTS ON ELECTRONIC DEVICES**
- B3:AWS-2 V S.1.3. PROVISION FOR SEALING**
- B3:GMA-1 V S.2.5. PROVISION FOR SEALING**
- B3:MDM-1 V S.1.11. PROVISION FOR SEALING**

Position: The SMA supports this item and recommends it be adopted.

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

GMA – GRAIN MOISTURE ANALYZERS

GMA-2 V TABLE S.2.5. CATEGORIES OF DEVICES AND METHODS OF SEALING.

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

GMA-3 D TABLE T.2.1. ACCEPTANCE AND MAINTENANCE TOLERANCES AIR OVEN METHOD FOR ALL GRAINS AND OIL SEEDS.

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

OTH – OTHER ITEMS

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

Position: The SMA opposes this item.

Rationale: The SMA feels that batching is an application, not a device type.

ADM – NCWM PUBLICATION 14, 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 fully supports this item and recommends it be adopted. The following extract is the latest language revision from the NCWM Interim meeting NTEP Committee Report and is supported by the SMA:

21.1.3.2.16. Subsequent audits will be held on-site to verify conformance to these standards. **Subsequent audits will be conducted every three years until objective evidence is obtained to move to a maximum of every five years. The first subsequent audit shall be conducted within three years of the initial audit, after which the audit frequency becomes five years.**

21.1.3.7.10. Surveillance audits for VCAP conducted by an outside auditor **representing a certification every three years until objective evidence is obtained to move to a maximum of every five years. A subsequent surveillance audit shall be conducted within three years of the initial audit, after which the audit frequency becomes five years.**