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SMA Positions on the Annual Report NCWM Specifications and Tolerances Committee

Annual Meeting of the 94th NCWM, July, 2009

310 GENERAL CODE

310-1 G-S.8. Provision for Sealing Electronic Adjustable Components, G-S.8.1. Access to Calibration and Configuration Adjustments, and G-S.8.2. Automatic or Semi-automatic Calibration Mechanism.

The SMA supports the intent of the item and recommends the following language:

G-S.8.2. Access to Calibration and Configuration modes. - A device shall be so designed that:

- (a) The application of the physical security seal shall ensure that the calibration and/or configuration modes are disabled, or
- (b) The calibration and/or configuration modes are protected by an approved method of sealing, and the device shall clearly and continuously indicate that it is in the calibration and/or configuration mode and record such message if capable of printing in this mode.

During the calibration and configuration modes, electronic devices shall either;

- not provide metrological indications that can be interpreted, or transmitted into memory, or printed as a correct measurement value, or
- clearly and continuously indicate that it is in the calibration and/or configuration mode and record such message if capable of printing in this mode.

(Nonretroactive as of January 1, 20XX)

(Added 20XX)

Comments:

- G-S.8.1. was changed to G-S.8.2.
- Removed the word “adjustment” and where appropriate add the word “modes”.
- Removed Category 1, 2 and 3 reference in (b).

310-2 Appendix D – Definition of Electronic Devices, Software-Based

The SMA opposes this item. There is no longer a technological basis for making this distinction in device types.

310-3 G-S.1. Identification – (Software)

The SMA opposes this item.

Rationale:

With no basis for different device types, all devices would have common marking requirements.

If the conference adopts the P and U device type definitions; the SMA would continue to oppose any differences in marking and identification between the two types.

310-4 G-N.3. Verification of Testing Standards

The SMA supports the committee's recommendation.

320 SCALES

320-1A S.2.1.6. Combined Zero-Tare ("0/T") Key, Appendix D – Definitions for Tare Mechanism, and Tare Balancing Mechanism

The SMA appreciates the work of the Tare Work Group and the additional efforts of the NIST Technical Advisor but recommends the item be withdrawn.

Rationale:

The item began with a weighing sector item dealing with the proper rounding of a tare value, on multiple range devices, when changing ranges. This discussion led to the development of the "mathematically correct" item (320-2 in the 2008 S&T Agenda and subsequently adopted) and the creation of the Tare Work Group. The work group's focus was to determine if any similar situation exists in the handbook that would not be addressed with the "mathematically correct" agenda item. The work group expanded their efforts to include harmonization to OIML R76 requirements related to tare. It is our feeling that these changes do not address any problem and can only lead to confusion in the current regulatory and product development fields.

320-1B S.2.3. Design of Balance, Tare, Level, Damping, Arresting Mechanisms, and Appendix D – Tare-weighing Mechanism.

The SMA recommends this item be withdrawn. See rationale in item 320-1A

320-1C S.2.3.3. through S.2.3.6. Value of Tare Indication and Recorded

Representations, and Appendix D. Definitions for Gross Weight Value, Net Weight Value, Net Weight, Tare, and Tare Weight Value

The SMA recommends this item be withdrawn. See rationale in item 320-1A

320-1D S.2.4. Preset Tare Mechanism and Appendix D – Definitions for Preset Tare

The SMA recommends this item be withdrawn. See rationale in item 320-1A

320-2 T.N.4.6. Time Dependence (Creep) for Load Cells During Type Evaluation and T.N.4.7. Creep Recovery for Load Cells During Type Evaluation

The SMA supports this item.

320-3 S.2.1.7. Automatic Zero-Setting Mechanism.

The SMA opposes this item.

Rationale:

To be fair to both the buyer and seller, the recommendation should include the ability to zero the indication in both a positive and negative direction.

(Note: we believe the item description should be S.2.1.7. not S.1.7.)

324 AUTOMATIC WEIGHING SYSTEMS

324-1 S.2.1.3. Automatic Zero-Setting Mechanism

The SMA opposes this item.

Rationale:

To be fair to both the buyer and seller, the recommendation should include the ability to zero the indication in both a positive and negative direction.

(Note: we believe the item description should be S.2.1.3. not S.2.1.7.)

324-2A S.2.2. Tare, S.2.2.1. Scale Interval and Capacity, S.2.2.2. Accuracy, and S.2.2.3. Damping

The SMA appreciates the work of the Tare Work Group and the additional efforts of the NIST Technical Advisor but recommends the item be withdrawn.

Rationale:

The item began with a weighing sector item dealing with the proper rounding of a tare value, on multiple range devices, when changing ranges. This discussion led to the development of the “mathematically correct” item (320-2 in the 2008 S&T Agenda and subsequently adopted) and the creation of the Tare Work Group. The work group’s focus was to determine if any similar situation exists in the handbook that would not be addressed with the “mathematically correct” agenda item. The work group expanded their efforts to include harmonization to OIML R76 requirements related to tare. It is our feeling that these changes do not address any problem and can only lead to confusion in the current regulatory and product development fields.

324-2B S.2.2.3. Combined Zero-setting and Tare-balancing Mechanisms (0/T Key)

The SMA recommends this item be withdrawn. See rationale in item 324-2A

324-2C S.2.2.3. Visibility of Operation and S.2.2.4. Subtractive Tare Mechanism

The SMA recommends this item be withdrawn. See rationale in item 324-2A

324-2D S.2.2.5. Consecutive Tare Operations and S.2.2.8. Indication and Printing of Weighing Results

The SMA recommends this item be withdrawn. See rationale in item 324-2A

324-2E S.2.3. Preset Tare Mechanism and S.2.3.1. Indication of Operation

The SMA recommends this item be withdrawn. See rationale in item 324-2A

360 OTHER ITEMS

Item 360-2: Developing Items

Part 2, Item 1 Scales: S.1.4.6. Height and Definition of Minimum Reading Distance, UR.2.10. Primary Indicating Elements Provided by the User, UR.2.11. Minimum Reading Distance and Definitions of Minimum Reading Distance and Primary Indications

The SMA supports the committee’s decision to withdraw this developmental item.