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SMA Positions on the NCWM Specifications and Tolerances Committee Report For the NCWM Annual (Conclusion) and Interim Meetings, January 2021 Developed November 10, 2020

Note: SMA positions on voting items developed at the SMATC April 8, 2020 meeting for presentation at the delayed NCWM Annual meeting (Conclusion) appear first. SMA positions for new and carryover items developed at the SMATC November 10, 2020 meeting follow.

SMA positions on voting items developed at the SMATC April 8, 2020 meeting

SCL - SCALES CODE

SCL-17.1 V S.1.8.5. RECORDED REPRESENTATIONS, POINT OF SALE SYSTEMS, APPENDIX D-DEFINITIONS: TARE

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-19.2 V UR.5. COUPLED-IN-MOTION RAILROAD WEIGHING SYSTEMS.

Position: The SMA opposes this item.

Rationale: The requirements for a reference scale should be specific, and not decided by "...the jurisdiction with statutory authority...". Requirements for traceability and accuracy are specified in Handbook 44 Appendix A "Fundamental Considerations", and should be followed in situations such as this.

SCL-20.10 V S.1.2.2.2. CLASS I AND II SCALES USED IN DIRECT SALE AND S.1.2.2.3. DEVIATION OF A "D" RESOLUTION.

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

SCL-20.13 V N.1.5. DISCRIMINATION TEST.

Position: The SMA supports this item and recommends adoption.

MDM – MULTIPLE DIMENSION MEASURING DEVICES

MDM-20.1 V S.1.3. NEGATIVE VALUES, S.1.6. CUSTOMER INDICATIONS AND RECORDED REPRESENTATIONS, S.1.7. MINIMUM MEASUREMENT, S.1.8. INDICATIONS BELOW MINIMUM AND ABOVE MAXIMUM, S.2. DESIGN OF ZERO TARE DIMENSIONAL OFFSET AND APPENDIX D – DEFINITIONS: DIMENSIONAL OFFSET

Position: The SMA supports this item and recommends adoption.

SMA positions for new and carryover items developed at the SMATC November 10, 2020 meeting

GENERAL CODE

GEN-20.1 D G-T.3 APPLICATION AND APPENDIX D – DEFINITIONS: TRUE VALUE

Position: The SMA opposes this item and recommends it be withdrawn.

Rationale: The SMA feels this item is not a necessary addition to the Handbook, and is not aware of any field issues that this item would address.

GEN-21.1 USE-FOR-FEE VEHICLE AND AXLE-LOAD SCALES

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

Rationale: SMA members may be willing to contribute if NIST OWM decides to submit a proposal.

BLOCK 2 ITEMS (B2) A DEFINE TRUE VALUE FOR USE IN ERROR CALCULATIONS

Position: The SMA takes no position on this item at this time. The SMA looks forward to the work of the Task Group to thoroughly clarify the usage of scale division “d” and verification scale interval “e” throughout Handbook 44.

SCL - SCALES CODE

SCL-16.1 A SECTIONS THROUGHOUT THE CODE TO INCLUDE PROVISIONS FOR COMMERCIAL WEIGH-IN-MOTION VEHICLE SCALE SYSTEMS

Position: The SMA recommends withdrawal of this item from the NCWM agenda.

Rationale: For almost five years, there has been a lack of substantiated evidence that the submitter's claims of their device performance capabilities can be validated. In addition, no suitable test procedures for a weigh-in-motion vehicle scale have been established.

SCL-21.1 S.1.1. ZERO INDICATION

Position: The SMA opposes this item and recommends withdrawal from the NCWM agenda.

Rationale: This function is evaluated by NTEP during the Type Approval process to ensure accurate weighments are initiated when exiting the "screen saver" mode. If a scale's functionality is suspect, a field verification may be performed to ensure it operates properly.

SCL-20.9 D S.1.1.3. ZERO INDICATION, LOAD RECEIVING ELEMENTS SEPARATE FROM WEIGHING ELEMENTS. AND APPENDIX D – DEFINITIONS: NO LOAD REFERENCE VALUE

Position: The SMA takes no position on this item.

Rationale: The SMA looks forward to the development of this item by the submitter.

SCL-20.12 D MULTIPLE SECTIONS TO ADD VEHICLE WEIGH-IN MOTION TO THE CODE AND APPENDIX D – DEFINITIONS; VEHICLE SCALE AND WEIGH-IN-MOTION VEHICLE SCALE.

Position: The SMA recommends this as a Voting item.

Rationale: The SMA recognizes the importance and benefit of the item to the public. The SMA also realizes that refinement based on further input from regulatory officials and other stakeholders can be addressed prior to the vote.

ABW – AUTOMATIC BULK WEIGHING SYSTEMS

ABW-16.1 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.

BLOCK 1 ITEMS (B1) TERMINOLOGY FOR TESTING STANDARDS

B1:SCL-18.1 A N.2. VERIFICATION (TESTING) STANDARDS

B1:ABW-18.1 A N.2. VERIFICATION (TESTING) STANDARDS

**B1:AWS-18.1 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-18.1, ABW-18.1, and AWS-18.1 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.

OTH – OTHER ITEMS

**OTH-21.1 APPENDIX A-2.1. ACCEPTANCE AND MAINTENANCE
TOLERANCES.**

Position: The SMA recommends this move forward as a Voting item with the following wording changes in red:

Acceptance tolerances are applied to new or newly reconditioned ~~or adjusted~~ equipment, equipment returned to service following official rejection for failure to conform to performance requirements, or equipment undergoing NTEP evaluation, and...

Rationale: This change will make these conditions consistent with General Code G-T.1, Acceptance Tolerances and exclude non-performance related repairs, for example displays/keyboards.

ADM – NCWM PUBLICATION 14, ADMINISTRATIVE POLICY

**ADM-2 CHANGE VCAP AUDIT FREQUENCY IN SECTIONS 3.2.16. AND
3.7.10.**

Position: The SMA fully supports this item as written below 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. 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. A subsequent surveillance audit shall be conducted within three years of the initial audit, after which the audit frequency becomes five years.