



SCALE MANUFACTURERS ASSOCIATION

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**SMA Positions on the
NCWM Specifications and Tolerances Committee Report
For the NCWM Annual Meeting, July 2021
Developed April 22, 2021**

GENERAL CODE

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

Position: The SMA supports the further development of this item and the work of the Verification Scale Division (e) Task Group.

Recommendation: The SMA would also like to encourage the use of the terminology “Verification Scale Interval” for “e” and “Scale Division” for “d”.

SCL - SCALES CODE

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

Position: The SMA continues to oppose 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. In addition, other device technologies could be unintentionally impacted by this item.

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 opposes this item in its current form.

Rationale: The SMA believes that the potential problem the item is attempting to address is an application issue, not a specification issue.

SCL-20.12 V 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 the adoption of this item.

Rationale: The SMA recognizes the importance and benefit of this item to the public. Stakeholder collaboration resulted in a refined proposal that has been well-received by regulators and industry members.

BLOCK 4 ITEMS (B4) ELECTRONICALLY CAPTURED TICKETS OR RECEIPTS

B4: GEN-21.2 D G-S.5.6. RECORDED REPRESENTATIONS

Position: The SMA supports this item.

Rationale: The SMA recognizes the importance of providing flexible options for recorded representations to the consumer.

B4: OTH-21.2 D APPENDIX D - DEFINITIONS.: RECORDED REPRESENTATIONS, RECORDING ELEMENT

Position: The SMA supports this item.

Rationale: The SMA recognizes the importance of providing flexible options for recorded representations to the consumer.

BLOCK 1 ITEMS (B1) TERMINOLOGY FOR TESTING STANDARDS

B1: GEN-19.1 A G-T.5. TOLERANCES ON TESTS WHEN TRANSFER STANDARDS ARE USED.

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 GEN-19.1, 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 broken displays/keyboards or damaged data labels, etc.

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.