



# SCALE MANUFACTURERS ASSOCIATION

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## **SMA Positions on the NCWM Specifications and Tolerances Committee Report For the NCWM Annual Meeting, July 2022 Developed April 5, 2022**

### **GENERAL CODE**

#### **GEN-22.1 V G.A.1. COMMERCIAL AND LAW-ENFORCEMENT EQUIPMENT**

Position: The SMA supports this item.

Rationale: The proposed item provides clarity to define what constitutes a “commercial transaction”.

### **SCL - SCALES CODE**

#### **SCL-22.2 A UR.1. SELECTION REQUIREMENTS, UR.1.X. CANNABIS**

Position: The SMA supports the continued development of this item.

Rationale: The addition of a User Requirement is not the best approach in this situation; User Requirements do not typically apply to a specific commodity. The following proposed changes should be considered instead:

- The words “retail cannabis” should be added to the “Class II” section of Table 7a.
- The words “bulk cannabis processing and sales” should be added to the “Class III” section of Table 7a.

### **MDM – MULTIPLE DIMENSION MEASURING DEVICES**

#### **MDM-22.1 D S.1.7. MINIMUM MEASUREMENT**

Position: The SMA opposes this item.

Rationale: The justification provided by the submitter does not adequately identify the issue this item is attempting to resolve, and why mobile tape-based MDMD devices should be exempted compared to all other MDMD devices. The SMA recommends that the submitter work with the MDMD Workgroup to develop a suitable solution to this issue.

## BLOCK 2 ITEMS (B2)

### 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 Interval” for “e” and “Scale Division” for “d” in every instance that it appears in this item.

#### **B2:SCL-20.3    A    S.5.4. RELATIONSHIP OF MINIMUM LOAD CELL VERIFICATION INTERVAL TO THE SCALE DIVISION**

#### **B2:SCL-20.4    A    TABLE 3. PARAMETERS OF ACCURACY CLASSES**

Recommendation: The SMA recommends the following change to Table 3, Footnote 1: *Class I and II scales may be designed such that the ~~verification scale division~~ verification interval e does not ~~be~~ equal ~~to~~ the scale division d.*

#### **B2:SCL-20.5    A    TABLE S.6.3.A. MARKING REQUIREMENTS, NOTE 3**

#### **B2:SCL-20.6    A    T.N.1.2. ACCURACY CLASSES AND T.N.1.3. SCALE DIVISION**

Recommendation: The SMA recommends the following change: *“... except that (d) is not used in reference...”*

#### **B2:SCL-20.7    A    TABLE 7. MAINTENANCE TOLERANCES**

Recommendation: The SMA recommends the following change: **Table 6. Maintenance Tolerances**

#### **B2:SCL-20.8    A    TABLE 8. RECOMMENDED MINIMUM LOAD**

Recommendation: The SMA recommends striking the following language from the submitter’s proposal: *~~Scales manufacturers are permitted to design scales where the value a verification scale division e differs from the displayed scale division d.~~*

Rationale: When taken with the SMA’s recommendation for SCL-20.4, this will avoid duplication in the HB44 code.

## **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 6 ITEMS (B6) COMMERCIAL AND LAW ENFORCEMENT, AXLE AND AXLE GROUP WEIGHTS**

Position: The SMA recommends that Block 6 be broken apart into three (3) individual items.

Rationale: Each of these items deals with a separate topic that needs to be discussed individually.

### **B6:SCL-22.1 D S.1.14. RECORDED REPRESENTATION OF AXLE OR AXLE GROUP WEIGHTS**

Position: The SMA supports this item with the following changes:

**S.1.14.1. Axle and Axle Group Loads. – All recorded representations of the different axle and axle group loads of a vehicle when weighed in a single draft on a multi-independent platform vehicle scale system shall be identified by providing indication of either:**

Rationale: Identifying the recorded weight values for the axle/axle groups as required in S.1.14.1.(a) is only necessary when the vehicle can be weighed in a single draft.

### **B6:SCL-22.3 D UR.3.3. SINGLE-DRAFT VEHICLE WEIGHING., AND UR.3.4. AXLE AND AXLE GROUP WEIGHT VALUES**

Position: The SMA supports the intent of this item, and believes that additional work is necessary.

## **BLOCK 8 ITEMS (B8)**

### **TOLERANCES ON TESTS USING TRANSFER STANDARDS, APPENDIX A – TOLERANCES FOR STANDARDS, AND APPENDIX D – FIELD STANDARDS AND TRANSFER STANDARDS**

**B8:GEN-19.1 D G-T.5. TOLERANCES ON TESTS WHEN TRANSFER STANDARDS ARE USED., APPENDIX A, SECTION 3.2. TOLERANCES FOR STANDARDS., AND APPENDIX D – DEFINITIONS: STANDARDS, FIELD., AND STANDARD, TRANSFER**

Position: The SMA takes no position on this item as this does not relate to scales.

**B8:OTH-22.1 D APPENDIX A: FUNDAMENTAL CONSIDERATIONS, 3. TESTING APPARATUS**

Position: The SMA supports this as a Developing item.

Rationale: Various stakeholders need to review the item and provide input to the submitter.