



SCALE MANUFACTURERS ASSOCIATION

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**SMA Positions on the
NCWM Specifications and Tolerances Committee Report
For the NCWM Annual Meeting, July 2023
Developed April 5th 2023**

SCL - SCALES CODE

SCL-22.1 V Recorded Representation of Axle or Axle Group Weights

Position: The SMA supports this as a voting item.

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 further development of this item and submitted feedback to the submitter.

SCL-23.2 TABLE S.6.3.A. MARKING REQUIREMENTS, AND TABLE S.6.3.B. NOTES FOR TABLE S.6.3.A. MARKING REQS

Position: The SMA supports this item.

SCL-23.3 A Verification Scale Division e: Multiple Sections Including, T.N.1.3., Table 6., T.N.3., T.N.4., T.N.6., T.N.8., T.N.9., T.1., T.2., S.1.1.1., T.N.1.2., Table S.6.3.a., Table S.3.6.b., Appendix D, S.1.2.2., Table 3., S.5.4., UR.3., Table 8.

Position: The SMA supports the further development from the Verification Scale Division (e) Task Group. The SMA would encourage the workgroup to make the final changes and present it to the S&T Committee and Membership, otherwise remove it.

Recommendation: The SMA encourages the use of the terminology "Verification Interval" for "e" and "Scale Division" for "d" in every instance that it appears in the Handbook.

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

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

Suggestions:

- In Table 7a Class III, replace the word “All Cannabis” with “non-retail Cannabis”.
- Add in notes section in Table 7a; “Refer to tale 8 for guidance on scale selection for Cannabis”.

WIM – WEIGH-IN-MOTION SYSTEMS – tentative code

WIM-23.1 Remove Tentative Status and Amend Numerous Sections

Position: The SMA opposes this item with the following concerns.

Major points of concern:

- Highway weight enforcement scales are already defined as Class IIII in the Scales code. Dynamic weighing should not perform worse than what has already been established and is acceptable.
- These devices will suffer major usage, so an acceptance and maintenance tolerance should be established similar to Class IIII values. Tighter tolerances will contribute to better performance and would detect more overweight vehicles and generate higher revenue.
- If added to the WIM code, law enforcement code would exist in both the Scales code and the WIM code that needs to be reconciled.
- If this item stays in WIM and does move forward, our recommendation would be to harmonize tolerances with OIML R134.

Rationale: The WIM code was not intended to be used in Commercial applications. Commercial and Law enforcement weighing applications, including WIM applications, are covered in the Scales 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 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 item.