

PIPER BACKGROUND:

Piper is an Irish Company founded in 1994. We operate internationally in Ireland, the UK, Australia, New Zealand and the United States. Our business is focused on dairy metering, sampling and traceability. We supply both farm and tanker based dairy metering systems in the USA. Our customers include major dairy companies such as DFA, Dean Foods and AgriMark.

Piper brought a proposal to the NCIMS in 2019 to allow for vehicle mounted metering and sampling. To support this application we presented a book of evidence including comprehensive data from milk collection in the United States. We completed these studies in conjunction with Federal Order One, New York Department of Agriculture & Markets, AgriMark, Dean Foods and DFA. This proposal was passed by 49 States and is currently being adopted into the Pasteurized Milk Ordinance.

Also in 2019 we submitted our system for testing under the National Type Evaluation Program and were issued a Certificate of Conformance for Weighing and Measuring Devices on November 9, 2019. We worked towards this approval in co-operation with the Weights and Measures Department of New York State, and the California Department carried out the verification. This work included engineering re-design work on our system and SOP and meeting the very stringent requirements of the testing program. It took approximately 18 months to complete and involved significant commitment in terms of time, travel and resources.

Piper also holds Weights and Measures qualifications in the other jurisdictions where we participate.

PIPER POSITION ON ITEM VTM 20.2

- In August 2019 the CWMA observed that it might be required to widen tolerances in order to allow for innovation (such as vehicle mounted milk metering systems).
- This observation was made in August 2019, explicitly on the basis that there were no active NTEP CCs for such metering systems.
- However, shortly after that date in November 2019 an active NTEP CC for such a system was issued using existing tolerances [NTEP CC 19-121].
- Therefore, there may no longer be a need to increase tolerances in order to move forward and allow for innovation in milk measurement.
- Innovation is possible by providers achieving certification using the existing tolerances.

PIPER POSITION ON ITEM VTM 20.2

- Piper recognises that the tolerances that apply in the USA are rigorous and represent an extremely high standard. US standards may represent a higher standard than applies in other jurisdictions (although this may not be a like-for-like comparison).
- Our observation is that the same extremely high standards apply in the other areas of US regulation also (e.g. sanitary as governed by the PMO, fair payment and representative sampling as overseen by the Federal Orders).
- Piper's approach has been to seek to meet US standards. This has frequently required engineering and design changes, and revisions of the system's Standard Operating Procedure [SOP].
- Further, it is our belief that advances in technology should at least equal, if not exceed, the methods they replace. In this case, the metering system is replacing measurement using a calibrated bulk tank.
- It is our understanding that tolerances are set by the needs of the market, and should not be altered to cater to the needs of a particular measuring instrument or company.
- Finally, it may be prejudicial to NTEP CC 19-121 to change the tolerances at this point.

NTEP CC NUMBER 19-121
ISSUED NOVEMBER 9, 2019 TO PIPER SYSTEMS
TESTED USING EXISTING HANDBOOK 44 TOLERANCES



Certificate Number: 19-121
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NATIONAL TYPE EVALUATION PROGRAM

Certificate of Conformance
for Weighing and Measuring Devices

For:

Meter Indicating Mass, Milk Metering System
Vehicle-Mounted or Stationary
Digital Electronic
Flow Transmitter Model(s): PD 340 / 440 C51,
PD 340 / 440 C63, and PD 340 / 440 C76
Vehicle Mounted Register/Indicator Model: DynaStream
US Stationary
Register/Indicator Model(s): SiloStream US, FloStream
US, and HubStream US

Submitted By:

Piper Systems
3 Sunnybank Centre, Bray
Wicklow A98C5P8
Ireland
Tel: +353 1 2829844
Contact: Leigh Hamilton
Email: leigh@pipersystems.com
Website: www.pipersystems.com

Standard Features and Options

Standard Features:

- An electromagnetic flow transmitter that measures in mass (lb) units (see **Table 1** for Meter Model Designations)
- Single point calibration capability
- Totalizer reading is displayed as a whole number
- All recorded values are digital
- Printed receipt capability
- Minimum liquid measurement conductivity: 5 microsiemens per centimeter ($\mu\text{S}/\text{cm}$)

Options:

- Vehicle-Mounted Register/Indicator Model DynaStream US
- Stationary Register/Indicator Model(s) SiloStream US, FloStream US, and HubStream US

This device was evaluated under the National Type Evaluation Program and was found to comply with the applicable technical requirements of "NIST Handbook 44: Specifications, Tolerances and Other Technical Requirements for Weighing and Measuring Devices." Evaluation results and device characteristics necessary for inspection and use in commerce are on the following pages. *Editorial changes, not affecting the type or metrological content, corrected this certificate.

Craig VanBuren
Chairman, NCWM, Inc.

Stephen Benjamin
Committee Chair, NTEP Committee
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1135 M Street, Suite 110 / Lincoln, Nebraska 68508

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PIPER
EVERY PRECIOUS DROP