



# SCALE MANUFACTURERS ASSOCIATION

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**SMA Positions on the  
NCWM Specifications and Tolerances Committee Report  
For the NCWM Interim Meeting, January 2022  
Developed November 2, 2021**

## GENERAL CODE

**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.

## **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:GEN-22.1 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”.

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

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

**S.1.14. Recorded Representation of Axle or Axle Group Weights. – The recorded representation of weights from individual axle or axle group weights shall clearly be identified as “not legal for trade” or “non-commercial” weight values unless the entire vehicle is positioned on live elements of a multiple-platform vehicle scale and where all axles/axle groups are weighed simultaneously. All recorded weights of axles/axle**

groups shall be identified as representing only a portion of the vehicle's total gross weight (e.g., by axle groupings such as: "axle group 1," "axle group 2," "axle group 3," or by individual axle description such as: "steering axle," "drive axles," "trailer axles").

Any total gross weight of the vehicle included in the recorded representations determined by summing axle weights shall be clearly identified as "not-legal-for trade" or "non-commercial" unless those axle weights were recorded when all parts of the vehicle rested simultaneously on live portions of the scale, or the individual components were uncoupled, positioned completely on the live elements, and weighed separately on the scale.

Rationale: The item attempts to define what constitutes a "commercial transaction", but the words "non-commercial" reduces its clarity. Secondly, it is not necessary to label each weight value of axle/axle group weights as "not legal for trade"; putting the words "not legal for trade" on the recorded representation once is adequate.

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

Position: The SMA supports this item.

## **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 I S.5.4. RELATIONSHIP OF MINIMUM LOAD CELL VERIFICATION INTERVAL TO THE SCALE DIVISION**

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

Recommendation: The SMA recommends the following change to Table 3, Footnote 1: *The manufacturer may design a scale such that the ~~verification scale division~~ verification interval e does not be equal to the scale division d.*

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

### **B2:SCL-20.6 I 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 I TABLE 7. MAINTENANCE TOLERANCES**

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

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

Recommendation: The SMA recommends the following change: ~~Scales manufacturers are permitted may have to design scales where the value a verification scale interval division e differs not equal to from the displayed scale division d.~~

**SCL - SCALES CODE**

**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-22.2 UR.1. SELECTION REQUIREMENTS, UR.1.X. CANNABIS**

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

Rationale: The requirements of Table 8 **Recommended Minimum Load** in Handbook 44 should be considered in the further development of this item.

**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:SCL-18.1 A N.2. VERIFICATION (TESTING) STANDARDS**
- B1:ABW-18.1 D N.2. VERIFICATION (TESTING) STANDARDS**
- B1:AWS-18.1 D N.1.3. VERIFICATION (TESTING) STANDARDS, N.3.1. OFFICIAL TESTS, UR.4. TESTING STANDARDS**
- B1:GMA-18.1 D 5.56(A): N.1.1. AIR OVEN REFERENCE METHOD TRANSFER STANDARDS, N.1.3. METER TO LIKE-TYPE METER METHOD TRANSFER STANDARDS AND 5.56(B): N.1.1. TRANSFER STANDARDS, T. TOLERANCES**
- B1:OTH-18.1 D APPENDIX A: FUNDAMENTAL CONSIDERATIONS, 3.2. TOLERANCES FOR STANDARD, 3.3. ACCURACY OF STANDARDS.**
- B1:GMA-18.2 D APPENDIX D – DEFINITIONS: FIFTH-WHEEL, OFFICIAL GRAIN SAMPLES, TRANSFER STANDARD AND STANDARD, FIELD**

**Position:** The SMA supports the proposal as it applies to the items SCL-18.1, ABW-18.1, AWS-18.1, GMA-18.1, OTH-18.1, and OTH-18.2 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.

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

### **MDM-22.1 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 other MDMD devices. The SMA recommends that the submitter work with the MDMD Workgroup to develop a suitable solution to this issue.

## OTH – OTHER ITEMS

### **OTH-22.1 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.