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**Date:** July 16, 2019 at 9:19:38 AM CDT  
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**Subject:** Comment on SCL-7

Had difficulty getting this to you. Committee may have already deliberated this item. I have amended our opposition from my verbal testimony.

**DMS OPOSSES this item unless amended with the following:**

1. If this item passes, a "UR" installation requirement should be adopted that prohibits the Point-Based Load cells from being installed on side tracks, spurs, etc. where cars, locomotives or trains may be stationary for periods greater than an hour.

**Opposition Item 1 :** This is an installation requirement not an application requirement as rebutted by submitter during open hearing. Railyards are always shuffling and moving railcars and frequently store them in whatever space they can. Having rail cars stored for hours or days onto point based load cells is the concern.

After the submitter withdrawn the proposed tolerance and specification changes - objection and recommendation number 2 below is withdrawn.

2. The submitter of this item has also "declared these systems are to be used to weigh only *unit trains* (multiple railway cars connected to one another) and not individual railway cars (S&T page A109 lines 20-22)." Any NTEP CC should include this limitation in the application paragraph of the CC along with "Special Use" marking requirements limiting the load cells unit trains to unit train applications.

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