**L&R Committee**

**RE: MOS-18.2**

Below are comments from NIST regarding the modified language submitted on 1/20/2020 for MOS- 18.2. “*Reorganize the Method of Sale of Commodities and create a section for Fuels, Lubricants and Automotive Products*.” It should be noted the language that appeared in the Fall regional agendas and printed version of the 2020 NCWM Interim has three of four regions recommending this item be withdrawn.

For the modified language that was submitted, NIST gathered reports from the NCWM Conference reports for what occurred on this subject matter (years 1985-1987).

To make language modification to the background information as to what occurred 35 years ago is unnecessary. Proper writeup on this subject is documented within the background for both the Uniform Fuels and Automotive Lubricants Inspection Law and the Fuels and Automotive Lubricants Regulation. As with all issues that are developed within the regulations, if individuals wanted to know how items evolved within the Conference, they could obtain information from the NCWM Conference reports.

If the Committee feels that something should be documented, we are providing the following language for consideration into the background for the Method of Sale of Commodities Regulation.

|  |
| --- |
| **The Conference recognized that some states may only adopt the Method of Sale of Commodities Regulation but have the legal authority in their weights and measures law to also regulate and take enforcement action in the areas of fuel quality. For this reason, the user will find fuels and related products within this regulation. The Conference worked to ensure that the text within the Method of Sale and the Fuels and Automotive Lubricants Regulations mirrored each other. However, this may not always be necessary in meeting the needs of its members.** |

Language for possible inclusion into the Fuels and Automotive Lubricants Regulation background.

|  |
| --- |
| **Even after the inclusion of the Uniform Regulation for Motor Fuel and Automotive Lubricants into NIST Handbook 130, the Conference recognized that more states adopt the Uniform Regulation for the Method of Sale of Commodities than adopt the Uniform Fuel and Automotive Lubricants Regulation.  To promote uniformity in state regulations a number of these regulations continue to be included in both regulations.** |