



# SCALE MANUFACTURERS ASSOCIATION

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**SMA Positions on the  
NCWM Specifications and Tolerances Committee Report  
For the NCWM Interim Meeting, January 2020  
Developed November 6, 2019**

## GENERAL CODE

### **GEN-20.2 G-T.1. ACCEPTANCE TOLERANCES**

Position: The SMA opposes this item.

Rationale: Handbook 44 specifies in section G-T.2. that Maintenance tolerance shall apply to equipment in actual use. Only devices that have undergone major reconditioning are required to meet Acceptance tolerances.

### **BLOCK 2 ITEMS (B2) DEFINE TRUE VALUE FOR USE IN ERROR CALCULATIONS**

Position: The SMA opposes the item being presented as a Block.

Rationale: The only commonality between the items in the Block is the submitter. The SMA recommends that the National S&T Committee breaks the Block into separate proposals going forward so they can each be evaluated based on their merit.

## SCALES CODE

### **SCL-17.1 A S.1.8.5. RECORDED REPRESENTATIONS, POINT OF SALE SYSTEMS**

Position: The SMA opposes this item.

Rationale: Since regulators verify that the tare values in POS systems are accurate, the SMA feels that the proposal would provide little or no benefit to the consumer, and opposes both Retroactive and Non-retroactive versions.

## **SCL-16.1 A SECTIONS THROUGHOUT THE CODE TO INCLUDE PROVISIONS FOR COMMERCIAL WEIGH-IN-MOTION VEHICLE SCALE SYSTEMS**

Position: The SMA recommends withdrawal of the item from the NCWM agenda.

Rationale: For over four years, there has been a lack of substantiated evidence that the submitter's claims of their device performance capabilities can be validated. In addition, no suitable test procedures for a weigh-in-motion vehicle scale have been established.

## **SCL-19.2 V T.N.3.6. COUPLED-IN-MOTION RAILROAD WEIGHING SYSTEMS., T.N.4.6. TIME DEPENDENCE (CREEP) FOR LOAD CELLS DURING TYPE EVALUATION., UR.5. COUPLED-IN-MOTION RAILROAD WEIGHING SYSTEMS. AND APPENDIX D – DEFINITIONS: POINT-BASED RAILROAD WEIGHING SYSTEMS.**

Position: The SMA opposes this item.

Rationale: The requirements for a reference scale should be specific, and not decided by "...the jurisdiction with statutory authority...". Requirements for traceability and accuracy are specified in Handbook 44 Appendix A "Fundamental Considerations", and should be followed in situations such as this.

The SMA also recommends the following corrections/cleanup be made to the proposal:

### **SCL-19.2 I ~~T.N.3.6. Coupled-In-Motion Railroad Weighing Systems., T.N.4.6. Time Dependence (Creep) for Load Cells during Type Evaluation., UR.5. Coupled-in-Motion Railroad Weighing Systems. and Appendix D – Definitions: point-based railroad weighing systems.~~**

- ~~a) Increase the tolerance for dynamic weighments of unit trains,~~
- ~~b) Provide an exception from "creep" tolerances for point-based in-motion railroad weighing systems,~~
- e) a) Require the user of coupled-in-motion railroad weighing systems to provide a static scale in close proximity for testing purposes, and
- d) b) Add a definition for Point-Based Railroad Weighing Systems to support those proposals.

## **SCL-20.9 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.

Rationale: The intent of the proposal is not understood well enough to evaluate properly and provide an appropriate recommendation.

**SCL-20.10 S.1.2.2.2. CLASS I AND II SCALES USED IN DIRECT SALE AND S.1.2.2.3. DEVIATION OF A “D” RESOLUTION.**

Position: The SMA supports this item and recommends it be assigned a status of Voting.

**SCL-20.11 S.1.2.2.2. CLASS I AND II SCALES USED IN DIRECT SALES.**

Position: The SMA supports this item if SCL-20.10 is withdrawn.

Rationale: This item resolves the unintended consequences associated with the previously added paragraph “S.1.2.2.2. Class I and II Scales Used in Direct Sales” for the jewelry and grain moisture analyzer applications and the associated Retroactive and Non-retroactive dates.

**SCL-20.12 MULTIPLE SECTIONS TO ADD VEHICLE WEIGH-IN-MOTION TO THE CODE AND APPENDIX D – DEFINITIONS; VEHICLE SCALE AND WEIGH-IN-MOTION VEHICLE SCALE.**

Position: The SMA recommends this be a Developing item.

Rationale: The SMA recognizes that the item has merit and looks forward to the planned demonstration of the equipment as well as other comments related to the proposed scale code changes.

**SCL-20.13 N.1.5. DISCRIMINATION TEST.**

Position: The SMA supports the concept of this item and suggests the following changes:

***N.1.5. Discrimination Test. – Except for digital electronic scales designated Accuracy Class I or II in which the value of  $e = d$  and is less than 5 mg.***

**ABW – AUTOMATIC BULK WEIGHING SYSTEMS**

**ABW-16.1 DA. APPLICATION, S SPECIFICATIONS, N. NOTES, UR. USER REQUIREMENTS AND APPENDIX D – DEFINITIONS: AUTOMATIC BULK WEIGHING SYSTEM.**

Position: The SMA takes no position on this item.

## **WIM – WEIGH-IN-MOTION SYSTEMS USED FOR VEHICLE ENFORCEMENT SCREENING TENTATIVE CODE**

**WIM-19.1 D TITLE OF TENTATIVE CODE, S.1.7.1. VALUES TO BE RECORDED., S.4.1. DESIGNATION OF ACCURACY., N.1. TEST PROCEDURES, T.2. TOLERANCE VALUES FOR ACCURACY CLASS A CLASSES., UR.1.1. GENERAL, TABLE 1. TYPICAL CLASS OR TYPE OF DEVICE FOR WEIGHING APPLICATIONS.**

Position: The SMA recommends this item be withdrawn due to the lack of additional development by the submitter.

### **BLOCK 1 ITEMS (B1) TERMINOLOGY FOR TESTING STANDARDS**

**B1:SCL-18.1 A N.2. VERIFICATION (TESTING) STANDARDS**

**B1:ABW-18.1 A N.2. VERIFICATION (TESTING) STANDARDS**

**B1:AWS-18.1 A N.1.3. VERIFICATION (TESTING) STANDARDS, N.3.1. OFFICIAL TESTS, UR.4. TESTING STANDARDS**

Position: The SMA supports the proposal as it applies to the items SCL-18.1, ABW-18.1, and AWS-18.1 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 HB 44.

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

**MDM-20.1 S.1.3. NEGATIVE VALUES, S.1.6. CUSTOMER INDICATIONS AND RECORDED REPRESENTATIONS, S.1.7. MINIMUM MEASUREMENT, S.1.8. INDICATIONS BELOW MINIMUM AND ABOVE MAXIMUM, S.2. DESIGN OF ZERO TARE DIMENSIONAL OFFSET AND APPENDIX D – DEFINITIONS: DIMENSIONAL OFFSET**

Position: The SMA supports and recommends this be a Voting item.

### **OTH – OTHER ITEMS**

**OTH-18.4 V APPENDIX D – DEFINITIONS: BATCH (BATCHING)**

Position: The SMA opposes this item.

Rationale: The SMA feels that batching is an application, not a device type.