



Don Onwiler
Executive Director
National Conference on Weights and Measures
1135 M Street, Suite 110
Lincoln, Nebraska 68508

January 13, 2020

Dear Mr. Onwiler,

On behalf of Agri-Mark, Inc. I am writing to comment on Item VTM 20.2 to change tolerances to accommodate more efficient milk-metering systems. We have reviewed Item VTM 20.2 that will be under review during your National Conference on Weights and Measures held in Riverside, CA from January 26th to January 29th 2020. After review we oppose the amendment to the NIST Handbook 44 Vehicle – Tank Meters Code.

We are in opposition of the proposal with concerns that it could allow for more unpredictable results for milk metering systems within our industry. This has the potential to create more inaccurate results during the milk metering process. As a business we are striving for improved variances during milk metering and widening the tolerance threshold would allow for increased variances during this process. We strive to improve our efficiency, and accuracy when investing in new technology for our member farms.

The submitter of this item stated, "However, it is widely recognized that it is not possible to remove all the air from the milk, which will result in an inaccuracy" when discussing the use of flow meters mounted on vehicles. New technology should not be a just cause to increase the tolerance levels, rather, the new technology needs to meet the regulations in place to be considered worthy of advancing our industry forward.

We hope you and the committee take our comments into consideration and we appreciate your time.

Kind Regards,

A handwritten signature in black ink, appearing to read "Jordan Clark", is written over a light blue circular background.

Jordan Clark
Manager, Member Transportation
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Owned by the farm families of Agri-Mark who provide their farm fresh milk to their award-winning brands.

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