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September 26, 2020

National Conference on Weights and Measurements

Attn: Mr. Don Onweiler

1135 M Street, Ste 110

Lincoln, NB 68508

Ref: New Proposal WTR-21.1

Dear Mr Onweiler:

Thank you for you letter of July 30 addressed to the Water Meter Manufacturers in the USA advising us of the above new Proposal WTR-21.1 in the coming NCWM meetings in the regional Specifications and Tolerances Committee agenda. I am on the Executive Staff of one of the major American water meter manufacturers.

From what I have read on this matter, it proposes a solution to a non-existent problem in America's water distribution network. Our water distribution system is most commonly a piping system of mains and service lines that are pressurized 7/24/365 by a connecting network of elevated storage tanks. The problem with reoccurring entrained air is with systems that are not pressurized continuously; in these non-continuous systems, 24 hour water needs are commonly met by individual roof / attic mounted storage cisterns fed when needed from float-controlled pressurized lines that refill the cisterns when pressurized supply is on-line. That system design can result in air initially entrained in the service lines.

There are several residential devices that deliver flow totals based on time rather than being controlled by an expected volume. The totalized flow then is highly dependent on the fixture supply inlet pressure. These devices include dishwashers, laundry equipment and some shower / bath faucets that are commonly used in the full open position until closed off either manually or by a time signal. These devices would result in a reduced totalization if the service line pressure was reduced by installation of a device as proposed in the Proposal WTR-21.1.

Please contact me if this matter needs additional discussion. I can be reached by telephone at 412-551-2663 or at email [rkoch@mastermeter.com](mailto:rkoch@mastermeter.com).

Thank you.

Ron Koch  
Master Meter, Inc., Advisor to the President/CEO

Cc: Mike Kielty, NCWM Measuring Sector