FORM 15, ATTACHMENT D
Comments and Responses from the Regional Weight and Measure S&T Committees
PROPOSAL TO AMEND NIST HANDBOOK 44, SECTION 2.25

NO.	Region	Comment	Response	Form 15
1.	CWMA	Doug Musick – Kansas • 3 truck classes, 3 different loads, 3 different speeds. Is the intention that there are different classes of trucks which are all tested at all 3 different loads and speeds? • What does FHWA mean? Spell out the acronym. Is that in a C.F.R. which can be referenced?	• Yes. It was proposed to test 3 trucks for 3 different loads and 3 different speeds. However, after having open hearings from all the regions, it was reduced to 3 truck classes (2-axle single unit truck, 3-axle single unit truck, and 5-axle semi-trailer truck), 2 loads (fully loaded and empty load), and 3 speeds (low speed < 10 mph, high speed at the maximum posted speed and average speed between low and high speeds). Accordingly, the number of test runs is reduced from 60 to 45 per truck, and the test run conditions are summarized in Table N.1.5. • FHWA is the abbreviation of the Federal Highway Administration. FHWA is spelled out.	• N.1.2.3. Dynamic Test Load for Class E; N.1.4.2 Test Speeds for Class E; Table N.1.5. • N.1.1.2. Selection of Test Vehicles for Class E.
2.	CWMA	Loren Minich – Kansas • P 168, S.1.7.1. missing the lettering, but it's that way in the tentative code. Formatting needs fixed. • Don't get rid of the current screening aspect of the tentative code. Supports this item moving on its own and not take away the ability of jurisdictions to use the tentative code for screening. Maybe add a second class?	• The lettering (a), (b), …, (n) exists in the tentative code and this new submission. The Agenda did not include all the lettering. • Class A is restored, and Class E is added. However, the Tentative Code kept removed as this would no longer be the tentative code.	• S.1.7.1. Values to be Recorded. • Throughout the document.

NO.	Region	Comment	Response	Form 15
3.	WWMA	Mr. Matt Douglas (State of California, Division of Measurement Standards on behalf of S&T Committee) • Mr. Douglas sought clarification about the line inside the proposed tolerance table and what the purpose of the second statement. On the last line in the table, it says that the gross vehicle weight shall be +/- 10% but it also says +/- 6%	• The second statement "The GVW tolerance shall be ± 10 % for all weighments (100% compliance)" is revised to "No single error may exceed a GVW tolerance of ± 10 % (100% compliance)". In other words, after all the 45 test runs of each vehicle, only 2 test runs (for 95% compliance) can yield to more than 5% error and less than 10% error.	• Table T.2.2-2. Tolerances for Accuracy Class E
4.	WWMA	Mr. Matt Douglas (State of California, Division of Measurement Standards) • Mr. Douglas commented he believes that there is some merit to some of the item. Mr. Douglas recommended keeping the accuracy class "A" and add accuracy class "E".	• Class A is restored, and Class E is added.	• Throughout the document.
5.	WWMA	Mr. Kenn Burt (San Luis Obispo County, California on behalf of S&T Committee) • Mr. Burt sought clarification if industry has seen this proposal and understand what they might be dealing with regard to how the WIM system will be used and applied for enforcement?	• The submitters have met regularly and developed a task force for the past several months. The Commercial Vehicle Safety Alliance (CVSA) has been made aware of this item. However, the trucking industry has not directly engaged with this agenda.	• N/A
6.	SWMA	Mr. Chesser (State of Arkansas) • Mr. Chesser stated that he liked the language on page 167 lines 25-28. He asked why strike paragraph B. • He also cited some errors on page 170.	• The strikeout was for Class A. Since Class A is restored and Class E is added, the strikeout is restored. • There were numbering typos (N.1.4.1. instead of N.1.4.2 & N.1.4.3.). They are all fixed to the correct numbering.	• A.1. General • N.1.4.2. Test Speeds for Class E

NO.	Region	Comment	Response	Form 15
7.	SWMA	Mr. Paul Floyd (State of Louisiana) • Mr. Paul Floyd stated that he has concerns about the accuracy of this system. He stated that he would support this item for screening purposes and recommends it moving forward as developing.	• The tolerance of 6% for the gross vehicle weight (GVW) was borrowed from the ASTM E1318. The submitters were able to obtain less than the tolerance of 6% for GVW. The target is to yield < 6% error at 95% compliance and < 10% error at 100% compliance for GVW.	• Table T.2.2-2. Tolerances for Accuracy Class E
8.	SWMA	• The SWMA S&T Committee asked about the speed and weight requirements used for testing in the proposal not matching with what the devices will be used to regulate. • The committee also questioned whether these devices would receive a type evaluation from NTEP if specifications were added to the handbook. • Additionally, the committee questioned whether a direct enforcement procedure should be separated from the tentative screening code.	• The system will be calibrated for a wide range between empty and fully loaded up to the legal limit. The calibration results will be optimized at different weight levels, speeds, and lane positions to extend the accuracy level to overweight outside of the range. • If the specifications are added to the HB44, the submitters plan to prepare a type evaluation from NTEP. • Class A is restored to the code, and Class E for enforcement is added.	• N/A • N/A • Throughout the document.
9.	NEWMA	• A presentation was given from the submitters of this item. The submitters reminded the body that this item deals exclusively with law enforcement scales, and not commercial scales.	• This code is not intended to remove any law enforcement or commercial scales using portable scale, but to implement the overweight enforcement scheme into the urban area where shoulder or space is not available. A term “fixed (not portable)” is added.	• A.1. General

NO.	Region	Comment	Response	Form 15
10.	NEWMA	Mr. John McGuire (NJ) • Mr. John McGuire inquired about a 10% leeway in gross weight and believes that if a law enforcement agency is writing summonses, the tolerance should be tighter. He also inquired if the SMA and NIST had a position on this proposal.	• The system will be tested to a 6% tolerance (as per this code and ASTM E1318 Type III) and the 10% leeway will be chosen as a local enforcement policy to issue the fines. The percentage on GVW would fall within tolerances of WIM systems to target heaviest offenders. Any violations written by law enforcement will be reviewed prior to issuance.	• N/A
11.	NEWMA	Mr. Jim Willis (NY) • Mr. Jim Willis stated that his understanding is there is a concern with both axel weights and gross weights of the overweight vehicles.	• The gross and axle weights have different weight accuracy. The gross weights are tighter than the axle weights.	• N/A
12.	NEWMA	Ms. Diane Lee (NIST-OWM) • Ms. Diane Lee inquired if this system will be used to provide official weight or estimation, and if weight is not correct are they going to weigh station to get official weight.	• During the calibration test, the system will be tested with a certified field reference scale and vehicles.	• N.1.2.1. Static Test Loads
13.	NEWMA	Mr. Jason Flint (NJ) • Mr. Jason Flint pointed out that the 10% leeway is a local enforcement decision and will not appear in the handbook as a tolerance.	• The 10% leeway depends on the local enforcement. The NYS legislation dictates the 10% leeway to ensure the overweight.	• N/A
14.	NEWMA	Mr. Jim Willis (NY) • Mr. Jim Willis has concerns with the number of runs required to test the system.	• The submitters implemented the number of test runs, and concluded that it would be do-able. The number of test runs is reduced from 60 to 45 per test vehicle.	• Table T.2.2-2. Tolerances for Accuracy Class E
15.	NEWMA	Mr. Jason Flint (NJ) • Mr. Jason Flint suggested that an on-site demonstration be made available so regulators can view the system being used.	• The submitters plan to host a demonstration of the enforcement system.	• N/A

References

- https://cwma.net/resources/Documents/CWMA-ST-Interim-Report-2022.pdf
- https://westernwma.org/resources/Documents/22-FINAL-REPORT-WWMA-ST.pdf
- https://www.swma.org/resources/Documents/22-FINAL-REPORT-SWMA-ST.pdf
- https://newma.us/resources/Documents/22-FINAL-REPORT-NEWMA-ST.pdf