



SCALE MANUFACTURERS ASSOCIATION

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SMA Positions on the NCWM Specifications and Tolerances Committee Report For the NCWM Interim Meeting, January 2023 Developed November 1, 2022

GENERAL CODE

GEN-22.1 V G.A.1. COMMERCIAL AND LAW-ENFORCEMENT EQUIPMENT

Position: The SMA supports this item.

Rationale: The proposed item provides clarity to define what constitutes a “commercial transaction”.

SCL - SCALES CODE

SCL-23.1 S.1.12. MANUAL WEIGHT ENTRIES

Position: The SMA supports this item.

Rationale: This item provides clarity in the specification when a manual weight entry is permitted.

SCL-23.2 TABLE S.6.3.A. MARKING REQUIREMENTS, AND TABLE S.6.3.B. NOTES FOR TABLE S.6.3.A. MARKING REQS

Position: The SMA supports this item.

Rationale: The Weighing Sector has already reviewed and placed this into the test method.

SCL-22.2 A UR.1. SELECTION REQUIREMENTS, UR.1.X. CANNABIS

Position: The SMA supports the continued development of this item.

Rationale: The addition of a User Requirement is not the best approach in this situation; User Requirements do not typically apply to a specific commodity. The following proposed changes should be considered instead:

- The words “retail cannabis” should be added to the “Class II” section of Table 7a.ⁱ
- The words “bulk cannabis processing and sales” should be added to the “Class III” section of Table 7a.

WIM – WEIGH-IN-MOTION SYSTEMS – tentative code

WIM-23.1 Remove Tentative Status and Amend Numerous Sections

Position: The SMA supports removing the tentative status from this code and it to remain used for Vehicle Screening only.

Rationale: This code is not intended to be used in Commercial applications. Commercial weighing applications, including WIM applications, are covered in the Scales code.

MDM – MULTIPLE DIMENSION MEASURING DEVICES

MDM-22.1 D S.1.7. MINIMUM MEASUREMENT

Position: The SMA opposes this item.

Rationale: The justification provided by the submitter does not adequately identify the issue this item is attempting to resolve, and why mobile tape-based MDMD devices should be exempted compared to all other MDMD devices. The SMA recommends that the submitter work with the MDMD Workgroup to develop a suitable solution to this issue, otherwise remove it.

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

Position: The SMA supports the further development of this block of items and the work of the Verification Scale Division (e) Task Group. The SMA would encourage the workgroup to make the final changes to this block of Assigned items and present it to the S&T Committee and Membership, otherwise remove it.

Recommendation: The SMA encourages the use of the terminology “Verification Interval” for “e” and “Scale Division” for “d” in every instance that it appears in the Handbook.

B2:SCL-20.3 A S.5.4. RELATIONSHIP OF MINIMUM LOAD CELL VERIFICATION INTERVAL TO THE SCALE DIVISION

B2:SCL-20.4 A TABLE 3. PARAMETERS OF ACCURACY CLASSES

Recommendation: The SMA recommends the following change to Table 3, Footnote 1: *Class I and II scales may be designed such that the ~~verification-scale division~~ verification interval e does not ~~be~~ equal ~~to~~ the scale division d.*

B2:SCL-20.5 A TABLE S.6.3.A. MARKING REQUIREMENTS, NOTE 3

B2:SCL-20.6 A T.N.1.2. ACCURACY CLASSES AND T.N.1.3. SCALE DIVISION

Recommendation: The SMA recommends the following change: “... except that (d) is not used in reference...”

B2:SCL-20.8 A TABLE 8. RECOMMENDED MINIMUM LOAD

Recommendation: The SMA recommends striking the following language from the submitter’s proposal: ~~Scales manufacturers are permitted to design scales where the value a verification scale division e differs from the displayed scale division d.~~

Rationale: When taken with the SMA’s recommendation for SCL-20.4, this will avoid duplication in the HB44 code.

**BLOCK 4 ITEMS (B4)
ELECTRONICALLY CAPTURED TICKETS OR RECEIPTS**

B4:GEN-21.2 D G-S.5.6. RECORDED REPRESENTATIONS

Position: The SMA supports this item and recommends it move forward as a voting item.

Rationale: The SMA recognizes the importance of providing flexible options for recorded representations to the consumer.

B4:OTH-21.2 D APPENDIX D - DEFINITIONS.: RECORDED REPRESENTATIONS, RECORDING ELEMENT

Position: The SMA supports this item and recommends it move forward as a voting item.

Rationale: The SMA recognizes the importance of providing flexible options for recorded representations to the consumer.

BLOCK 6 ITEMS (B6)

COMMERCIAL AND LAW ENFORCEMENT, AXLE AND AXLE GROUP WEIGHTS

Position: The SMA recommends that Block 6 be broken apart into three (3) individual items.

Rationale: Each of these items deals with a separate topic that needs to be discussed individually.

B6:SCL-22.1 D S.1.14. RECORDED REPRESENTATION OF AXLE OR AXLE GROUP WEIGHTS

Position: The SMA supports this item with the following changes:

S.1.14.1. Axle and Axle Group Loads. – All recorded representations of the different axle and axle group loads of a vehicle when weighed in a single draft on a multi-independent platform vehicle scale system shall be identified by providing indication of either:

Rationale: Identifying the recorded weight values for the axle/axle groups as required in S.1.14.1.(a) is only necessary when the vehicle can be weighed in a single draft.

B6:SCL-22.3 D UR.3.3. SINGLE-DRAFT VEHICLE WEIGHING., AND UR.3.4. AXLE AND AXLE GROUP WEIGHT VALUES

Position: The SMA supports the intent of this item, and believes that additional work is necessary.

BLOCK 8 ITEMS (B8)

TOLERANCES ON TESTS USING TRANSFER STANDARDS, APPENDIX A – TOLERANCES FOR STANDARDS, AND APPENDIX D – FIELD STANDARDS AND TRANSFER STANDARDS

B8:GEN-19.1 D G-T.5. TOLERANCES ON TESTS WHEN TRANSFER STANDARDS ARE USED., APPENDIX A, SECTION 3.2. TOLERANCES FOR STANDARDS., AND APPENDIX D – DEFINITIONS: STANDARDS, FIELD., AND STANDARD, TRANSFER

Position: The SMA takes no position on this item as this does not relate to scales.

B8:OTH-22.1 D APPENDIX A: FUNDAMENTAL CONSIDERATIONS, 3. TESTING APPARATUS

Position: The SMA recommends "weighing and" be removed from the proposed changes and supports this as a Developing item.

Rationale: Various stakeholders need to review the item and provide input to the submitter.