[redacted]

FYI

Get Outlook for iOS

[redacted]

Subject: Re: [EXT]Open Hearing Comments - SCL-24.2

Mr. Douglas,

Thank you for submitting your comments in writing. I will distribute to the committee accordingly.

David

Get Outlook for iOS

[redacted]

Subject: [EXT]Open Hearing Comments - SCL-24.2

ATTENTION: This email **DID NOT** originate from County Staff. Please proceed with caution when interacting with any embedded links or attachments.

Good Evening Mr. Chair,

Please see my comments below from the S&T open hearings session about SCL-24.2, Multiple Sections Regarding Tare –

The language in the agenda seems to have been updated since the regional meetings; I appreciate the work done by the submitter as well as the work performed by NIST to review this item.

Overall, we support a Developing status.

We agree with NIST that S.1.16. should have a different word such as “indication” or “identification” rather than “marking”.

Since the proposal seems, in part, to address scales which either do or do not have

mathematical agreement between tare, net, and gross values – would it be prudent to include some type of requirement to identify which method is utilized by a particular scale (either via markings or the type evaluation) so that an inspector in the field is aware when inspecting the scale? (i.e. to determine if the scale is performing as evaluated if the values are not in agreement)

I agree with NIST that OIML R76 4.6.12. being added to S.1.2.1. would provide better clarity.

While I appreciate T.1.1. identifies that the tolerances are applicable to both net and gross weights; I do not believe that the ¼ e accuracy language is clarifying enough to the reader that the intention is that the tolerance only applies to the net weight indication when using a semiautomatic tare. If the intention is to allow error weights to be used to apply a tolerance when using a pre-determined tare, I believe that both methods of testing should be identified as permissible tests in the notes section of the code to provide context and clarity.

Finally, while I agree that an issue with mathematical agreement has been identified; I do not know that the language in S.1.18. corrects the issue or if the issue can be corrected but do appreciate that the proposal does provide support that mathematical agreement between tare, net, and gross weights is not always feasible.

Sincerely,

Matt Douglas

SUPERVISING SPECIAL INVESTIGATOR
CALIFORNIA DEPARTMENT OF FOOD & AGRICULTURE
DIVISION OF MEASUREMENT STANDARDS
ENFORCEMENT BRANCH – DEVICE PROGRAM
[redacted]

cdfa CALIFORNIA DEPARTMENT OF FOOD & AGRICULTURE

CONFIDENTIALITY NOTICE: This communication with its contents may contain confidential and/or legally privileged information. It is solely for the use of the intended recipient(s). Unauthorized interception, review, use or disclosure is prohibited and may violate applicable laws including the Electronic Communications Privacy Act. If you are not the intended recipient, please contact the sender and destroy all copies of the communication.

You received this message as part of the **Specifications and Tolerances Committee** email group.