



## SCALE MANUFACTURERS ASSOCIATION

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### SMA Positions on the NCWM Specifications and Tolerances Committee Report NCWM Annual Meeting, July, 2017

#### 3100 GENERAL CODE

##### 3100-1 G-S.5.2.2. Digital Indication and Representation (Related items 3200-5 and 3600-2)

Position: The SMA opposes this item.

Rationale: This item would restrict the use of multiple scales operating using internal resolution to create an additional scale that provides the total weight value.

#### 3200 SCALES CODE

##### 3200-1 S.1.2. Value of Scale Division Units and Appendix D – Definitions: batching scale

Position: The SMA opposes this item.

Rationale: The SMA does not support adding the submitter's provided definition of "batching scale" to Handbook 44. The SMA feels that this definition is for the application of a scale and not a performance specification.

##### 3200-2 S.1.2.2. Verification Scale Interval

Position: The SMA supports this item.

Rationale: The SMA appreciates the incorporation of our comments and suggestions into the proposed item changes, and the flexibility to incorporate the changes over an extended period of time.

##### 3200-3 S.1.8.5. Recorded Representations, Point of Sale Systems and S.1.9.3. Recorded Representations, Random Weight Package Labels

Position: The SMA opposes this item.

Rationale: The SMA feels that the implementation cost of the proposal would have a significant impact to the manufacturers, large and small retailers, and ultimately consumers, while providing no benefit.

**3200-4 Table 3, Parameters for Accuracy Classes (Related item 3200-8)**

Position: The SMA opposes this item.

Rationale: The SMA feels this is an unnecessary change to the code. The proposal introduces new accuracy classes and changes the concept of a scale being comprised of an NTEP-certified indicator, a weighing/load receiving element, and loadcell(s).

**3200-5 Table 3, Parameters for Accuracy Classes (Related items 3100-1 and 3600-2)**

Position: The SMA opposes this item.

Rationale: This item would restrict the use of multiple scales operating using internal resolution to create an additional scale that provides the total weight value. This proposal would not address the total scope of the changes necessary to eliminate ambiguity in the code. Changes in this area would require a more comprehensive approach.

**3200-6 N.1. Test Procedures**

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

Recommendation: The SMA recommends removing the proposed language shown in N.1.1. and N.1.2. In addition, we recommend creating a new subsection N.1.3.X for the proposed paragraph currently listed under N.1.3.2 Equal Arm Scales.

**3200-8 T.N.3.6. Coupled-in-Motion Railroad Weighing Systems (Related item 3200-4)**

Position: The SMA opposes this item.

Rationale: The SMA feels this is an unnecessary change to the code. The proposal introduces new accuracy classes and changes the concept of a scale being comprised of an NTEP-certified indicator, a weighing/load receiving element, and loadcell(s).

**3202-1 D - A. Application, S Specifications, N. Notes, UR. User Requirements**

Position: The SMA takes no position on this item at this time and looks forward to additional analysis performed by the appropriate stakeholders.

**3205-1 A. Application. and Sections Throughout the Code to Address Commercial and Law Enforcement Applications**

Position: The SMA takes no position on this item at this time and looks forward to recommendations from the Weigh In Motion Task Group.

**3500 MULTIPLE DIMENSION MEASURING DEVICES CODE**

**3508-1 S.1.7. Minimum Measurement Lengths and S.1.8. Indications Below Minimum and Above Maximum**

Position: The SMA supports the adoption of this item.

## **3600 OTHER ITEMS**

### **3600-2 Appendix A – Fundamental Considerations: Section 4.4. General Considerations (Related items 3100-1 and 3200-5)**

Position: The SMA opposes this item.

Rationale: This item would restrict the use of multiple scales operating using internal resolution to create an additional scale that provides the total weight value. This proposal would not address the total scope of the changes necessary to eliminate ambiguity in the code. Changes in this area would require a more comprehensive approach.

### **3600-5 D Appendix D – Definitions: Remote Configuration Capability**

Position: The SMA is opposed to this item as written.

Rationale: The industry-accepted definition of “configuration” includes items that should not be considered sealable parameters. The SMA recommends removing the text “configuration or” from paragraph S.1.11.1.