WEIGHLOG

SCALE MANUFACTURERS ASSOCIATION, INC.
6724 Lone Oak Blvd. • Naples, Florida 34109
http://www.scalemanufacturers.org

SMA Member Companies

REGULAR MEMBERS

Avery Weigh-Tronix, Inc.

Cardinal Scale Manufacturing Co.

Fancor, Inc.

Hobart Corporation

Hottinger Baldwin Measurements

LTS Scale Corporation

McKesson Automation Systems

Mettler-Toledo, Inc.

Sartorius Corporation

Systems Associates, Inc.

Vishay Transducers

ASSOCIATE MEMBERS

A&D Engineering, Inc.

Flintec, Inc.

Rice Lake Weighing Systems

MEMBER
SCALE MANUFACTURERS ASSOCIATION, INC.

WINTER 2004

SMA FALL MEETING

The SMA's 59th Fall Meeting convened at the Sheraton Sand Key Resort, Clearwater Beach, Florida from Wednesday, November 10 to Friday, November 12, 2004.

Members had an opportunity to directly hear and discuss the status of national and NTEP issues before the National Conference on Weights and Measures from NCWM Chairman Elect, Don Onwiler. Members also had an opportunity to directly hear and discuss the status of proposals and programs at the NIST Office of Weights and Measures from Henry Oppermann, the Chief of that division. Those attending the Technical Committee meeting also had an opportunity to interface directly with both officials as well as Juana Williams, a key staff member of the Weights and Measures Division.

The assembled members adopted SMA Positions on issues on the agenda of the NCWM Specifications and Tolerance Committee at the upcoming Interim Meeting of the NCWM in January. See SMA Positions in this newsletter.

The assembled members adopted a new SMA Standard entitled "Environmental Design Standards For Scales" (SMA EDS-1104) First Edition. See extended article in this newsletter.

The assembled members approved certain changes to the SMA Technical Committee Charter which were required with the change from a Technical Director to a Chair and Vice-Chair arrangement.

The Association bid a fond farewell to Dave Quinn who has recently retired from Fairbanks and who will no longer be involved with the SMA after almost two decades of continuous involvement. The SMA wished him and his wife, Shirley, a long and happy retirement.

SMA President, Rick Norden congratulates Dave Quinn on his retirement and thanks him for his service to the Association and the Industry.

An Industry Round Table was conducted and allowed the members to share their perceptions of the business climate and the problems that confront the industry. The consensus appeared to be that business has been picking up and the companies are cautiously optimistic that this trend will continue into the next year. Most companies are either hiring or are prepared to hire. Major issues continue to be raw material prices, especially for steel, as well as rising health care costs.

SMA WELCOMES BACK NEW MEMBERS

Partially due to the rebounding economy and partially due to the new SMA membership structure, SMA was able to welcome back two former members of the Association.

Flintec, Inc. rejoined SMA on August 24, 2004 as an Associate Member. Their official representative is Jeff Robidoux, Director of Sales.

A&D Engineering, Inc. rejoined SMA on September 19, 2004 as an Associate Member. Their official representative is Jerry Wang, Director of Quality and Engineering.

SMA Board Member, Steve Langford, 2nd from left, Cardinal Scale Mfg.Co., welcomes (L-R) Jaime San Pedro, Vishay Transducers, Bill Podl (prospective member) Doran Scales, Robert Gray, Flintec, and Don Onwiler, NCWM Chairman-Elect to the SMA Fall Meeting.

Flintec sent Robert Gray, President, and Joseph Antkowiak, Business Development Manager, to the SMA Fall Meeting while A&D Engineering sent Jerry Wang. All of these old friends of the Association were cordially welcomed back and were very active participants in all of the meetings.

Nigel Mills, (R), Hobart Corp, welcomes (L-R) Joseph Antkowiak, Flintec, Inc., Lou Straub, Fancor, Inc., and Paul Lewis, Rice Lake Weighing, to the SMA Fall Meeting.

SMA membership is comprised of companies dedicated to the best interests of the scale industry as a whole; to the owners and users of scales, who are entitled to the best practical weighing equipment which can be produced; and to the public, which is so dependent upon accurate and dependable weights.

NTEP Directors Questions for 2004 Published

The NTEP Directors Questions for 2004 have been compiled and published on the SMA web site.

Since 1997, the Scale Manufacturers Association and the National Conference on Weights and Measures have hosted breakfast meetings at the regional Weights and Measures association venues throughout the year. Each year we have asked for candidate questions about the NTEP program from SMA, NIST/OWM, NCWM, and State Directors. The candidate questions were balloted and scored by degree of interest. We then selected the top three or four questions to ask that year. In order to ascertain the degree of uniformity and interpretation of selected W&M practices, the same questions are asked at each regional meeting.

The following questions were discussed in the 2004 round.
QUESTION ONE: NTEP approves separate main elements like indicators and scale bases and states that they may be combined with any approved, compatible element. How does your jurisdiction inspect devices that are combinations of separately approved elements (OIML: modules)? Do you do any specific testing to ensure that the separate elements are, in fact, compatible?
QUESTION TWO: Does your jurisdiction treat the first test of a new device (initial verification) different from routine testing during annual re-inspections (subsequent verification)? If so, what additional inspections or tests would you perform? Do you assign this to specific staff or is it done by all inspectors?
QUESTION THREE: How do your field inspectors distinguish between built for purpose and not built for purpose devices?
QUESTION FOUR: Does the CC contain satisfactory / sufficient / detailed information for your field inspectors to quickly and easily perform inspection on the device? Does the information regarding the test conditions, listed on the second page, provide you with any information of value?

UPCOMING MEETINGS OF INTEREST TO SMA MEMBERS

NCWM 90th Interim Meeting
Santa Monica, California
January 23 - 26, 2005
http://www.ncwm.net

SMA 60th Anniversary Annual Meeting
TBD
April 20 - 22, 2005
http://www.scalemanufacturers.org

Central W&M Association 20th Anniversary Annual Meeting
Madison, Wisconsin
May 1 - 5, 2005
Contract: Judy Cardin, 608-224-4945

Northeast W&M Association Annual Meeting
Albany, New York
May 16 - 19, 2005
Contact: William Wilson, 518-565-4681

40th Meeting of the International Committee of Legal Metrology (CIML)
Lyon, France
June 17 - 20, 2005
Contact: Chuck Ehrlich, 301-975-4834

NCWM 100th Anniversary and 90th Annual Meeting
Orlando, FL
July 10 - 14, 2005

NTETC Weighing Sector Annual Meeting
Location TBD
September, 2005

Western W&M Association Annual Meeting
Location TBD
September, 2005
http://www.westernwma.org

Southern W&M Association Annual Meeting
Location TBD
October, 2005
http://www.swma.org

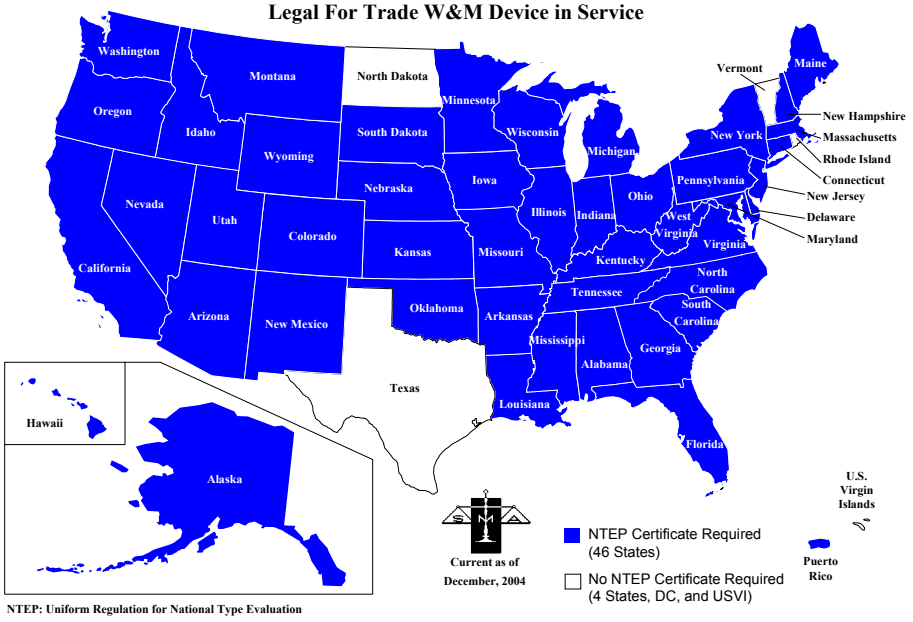
SMA Fall Meeting
Location TBD
November 9 - 11, 2005
http://www.scalemanufacturers.org

Canadian Forum on Trade Measurement (CFTM) 2004
Hilton Lac-Leamy, Gatineau, Quebec
November 17 - 19
Contact: Tanya Joiner, 613-952-2625 or joiner.tanya@ic.gc.ca

SMA NTEP ADOPTION MAP REVISED

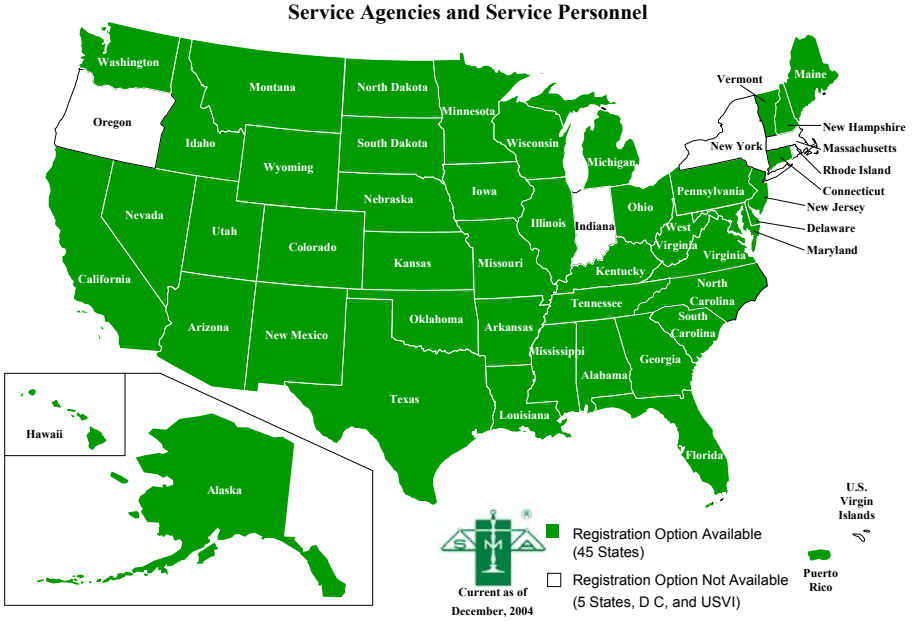
For the last decade, SMA has produced a map that showed the progress of adoption by States and territories of the National Type Evaluation Program (NTEP) and Voluntary Registration of Service Agencies and Technicians (VRSA) At the Fall Meeting, SMA decided that, regardless of how a State is using NTEP, the real issue for manufacturers and users, is what States require a NTEP Certificate of Conformance to enable a legal for trade device to be placed in service. They also decided to present adoption of VRSA on a separate map. Both are shown below and are available for review and download on the SMA web site.

Blue States Require a NTEP Certificate to Place a Legal For Trade W&M Device in Service



NTEP: Uniform Regulation for National Type Evaluation

Green States Require Registration of Service Agencies and Service Personnel



NEWS YOU CAN USE

NEW Acting Director at NIST.

On November 21, 2004 the Senate confirmed the nomination of NIST Director, Arden L. Bement Jr. to be director of the National Science Foundation (NSF) for the remainder of a six-year term ending August 2, 2010.

NIST Deputy Director Hratch G. Semerjian is now serving as the NIST acting director.

NEW W&M Quarterly Published in November.

The latest NIST Weights and Measures Quarterly, it is available as a PDF document from the following link: http://ts.nist.gov/ts/htdocs/230/235/wmquarterly.pdf. Some items of particular importance to many members are summarized below.

NOW AVAILABLE - Free -

OIML Publications. In October, the International Conference of Legal Metrology (CIML) voted to make all OIML Publications available FREE OF CHARGE as of November 1, 2004. To download OIML Recommendations and Documents (which can be freely reproduced), please go to http::://www.oiml.org and click the "Download Publications" link in the menu.

NIST Special Publication 1010, "Audit Trail Device Security ", a computer-based training course on CD-ROM, is available for free from NIST/OWM at 301-975-4004 or by e-mail at owm@nist.gov.

Stored Vehicle Tare Forum and National Working Group

A public forum on the use of stored vehicle tare was held at the U.S. Dept. of Commerce, in September. The forum was held to clarify the weights and measures laws requiring accurate net weights on commercial transactions. A National Working Group was formed as a result of the meeting. The NWG will be conducting studies of stored tare, especially stored vehicle tares. If you would like to participate in this working group or if you would like mor information or a copy of the presentations made at the forum, contact Tome Coleman at NIST/OWM, 301-975-4859, or t.coleman@nist.gov.

New OIML Document on Software Requirements Available For Comment

A pre-draft for an OIML TC5/SC2 Document "General Requirements for Software-Controlled Measuring Instruments" is available for comments that are due by February, 28, 2005. The Document is intended as guidance for technical committees when assessing software requirements in Recommendations for software-controlled measuring instruments. U.S. interested parties should return their comments to S.Wayne Stiefel at NIST no later than February 1. 2005. (301-975-4011 or stiefel@nist.gov).

Three SMA-Relevant Articles You Should Read

"Manual Gross, Tare, and Net Weigh Entries on Scales" by Steve Cook. At the July NCWM Annual Meeting, Handbook 44, Section 2.20. Scales code paragraphs S.1.12. Manual Gross Weights, and US.3.9. Use of Manual Gross Weight Entries were amended to recognize manual entry of net weights on items previously weighted on other legal-for-trade scales and deleted the term "Gross" in the title of the paragraph. Some railway inspectors have misinterpreted the change and believe the requirement applies to ALL manually entered weights. Mr. Cook attempts to correct the misinterpretation and identifies editorial changes that will prevent this misinterpretation in the future.

"Testing the Counting Feature on a Prescription Scale" by Rick Harshman. SMA supported the acceptance of the counting feature as a legal-for-trade feature and it was recognized on January 1, 2004. Mr. Harshman's in-depth article outlines the correct procedures for conducting a performance test on this feature of a prescription scale.

"Using NIST Handbook 44" by Juana Williams. Ms. Williams gives an excellent and pithy overview of the organization and use of Handbook 44. Reading this will help most people better understand and navigate this often confusing, but critical, document. Must Read.

SMA APPROVES NEW STANDARD
Environmental Design Standards For Scales (SMA EDS-1104) First Edition

SMA believes that there is a need in the marketplace for a way of determining the suitability of a scale for use in special environmental conditions, especially, wash down.

This SMA Standard provides a means of specifying a range of environmental conditions that would enable an end-user of a weighing and measuring device to determine its suitability for application in those environmental conditions. The standard also allow a manufacturer to define a range of test criteria that would enable product testing to realistic application-environment conditions.

The Object of the standard is to provide:

1. Definitions for degrees of protection provided by enclosures of electrical equipment as regards:
   - Protection of persons against access to hazardous parts inside the enclosure;
   - Protection of the equipment inside the enclosure against ingress of solid foreign objects;
   - Protection of the equipment inside the enclosure against harmful effects due to the ingress of water.
2. Designations for these degrees of protection.
3. Requirements for each designation.

EN 60529 is a standard that describes a system for classifying the degree of protection provided by an enclosure of electrical equipment.

DIN 40050, Part 9 is a standard that describes a test for protection against foreign objects, water and access, generally associated with road vehicles.

EN 60529 and DIN 40050 Part 9, in combination, form a complete set of standards for the degrees of ingress protection provided by enclosures (IP code). The SMA Standard adopts them in their entirety for all conditions covered by the definitions for degrees of protection identified as "Objects of the Standard". (While the DIN 40050 Part 9 standard is generally associated with road vehicles, the SMA Standard uses it to define an additional, and traceable, protection level for scales.)

However, in determining suitability for use of a scale in a given environment, additional consideration must be made for possible chemical contamination by the chemicals used in that environment. The EN and DIN Standards make no consideration chemical contamination.

The SMA Standard addresses cleaning and chemical issues that are not addressed by the EN and DIN Standards. Chemicals can be classified as those used to clean the scale and those being weighed by the scale and therefore likely to contact the scale and scale components. The SMA Standard allows the device to be specified using the full capabilities of EN 60529 with additional "chemical (C)" and "special (S)" designations.

MARKING: The SMA Standard provides a means for marking the product to show compliance. This is done by using the letters "SMA" followed by the Class designation as defined in the table located in Section 3 Wash Down Environments Classification. Here are two examples of markings using the SMA Standard along with their meaning:

> SMA - Class 1: Marking indicates that the product has been tested to the Class 1 level of protection, as defined in the standard's Wash Down Environments Classification, and meets the requirements for Wipe down protection.
>
> SMA - Class 4C: Marking indicates that the product has been tested to the Class 4C level of protection, as defined in the standard's Wash Down Environments Classification, and meets the requirements for protection against strong jet water at increased pressure.

TESTING: The SMA Standard does not invent new testing requirements. Compliance testing is to be performed as defined in the latest revision of EN 60529 for the equivalent IP rating, unless identified in the exceptions defined by the SMA Standard.

The SMA Standard defines those exceptions as:

> Testing to SMA Class 4 and Class 6 requires additional testing for the supplemental letter "K". Supplemental testing is to be performed as defined in Table 8 of the DIN 40050 standard.
>
> Water temperature for performing compliance testing to IP69K is to be 80°C (176°F) with a tolerance range of ±5°C (9°F).
>
> Testing to SMA Classes ending with the letter "C" include the addition of soap, a mild cleaning agent, chemical based cleaning agent, or a sanitizing agent. These agents may also be included with the use of hot water or steam. It is outside the scope of this document it identify these agents by name. It is only necessary to identify those agents used during the conduct of the test.

Finally, the SMA Standard provides, as an Annex, a brief summary of the degrees of protection for Electrical Equipment as required by EN 60529 along with a review of its two number/character designation system to allow ease of reference for users of the SMA Standard.

The standard is available for download in PDF format, free of charge, from the SMA web site at: http://www.scalemanufacturers.org/Standard.htm.

Don Onwiler Reports on NCWM and NTEP Issues at Fall Meeting

Don Onwiler, Chairman Elect, National Conference on Weights and Measures provided an overview of the status of major items of interest regarding the NCWM and NTEP. Some of his points are grouped and summarized below.

In 2005 they are celebrating 100 years of NCWM. They are looking for artifacts from the last 100 years that they can display (on loan) at the NCWM Annual Meeting in July.

Wes Diggs is the Chair of the NCWM. Wes agreed to serve again due to the departure of David Frieders. His term will end in July when Don will succeed to the position.

The NCWM Board supports harmonization between OIML and NTEP but they have some concerns. He believes that NTEP has had an enormous positive impact on the entire U.S. weights and measures community. It has raised the technical level of all state weights and measures people. He is concerned that the U.S. NTEP laboratories will not be able to compete with the big three European labs which are state subsidized. The NTEP laboratories cannot compete in time to do testing and in costs. This could be an unintended consequence of harmonization and the MAA.

The Voluntary Conformity Assessment Program has been accepted as a policy by the NCWM Board of Directors and will be published in Section S in 2005. The VCAP is designed to, hopefully, fit in seamlessly with a company's ISO 900X quality programs. There are, however, no target dates for companies to adopt and document their VCAP conformity.

The Administrative Review of Certificates of Conformance Policy is progressing. There are issues of standardization since the CoC program has evolved over the 19 years of NTEP and each successive CoC has contained more information.

They are trying to develop an electronic copy of Pub 14. They are working on the licensing technology that will control the number of people who can access a copy of Pub 14 on a network at the same time.

They are trying to provide more continuity to the position of Chair of the NTEP Committee. They are considering making it a three year appointment.

They are studying ways of modifying the S&T Committee's issue development process. Two ideas are being considered. One is to beef up the technical representation on the S&T Committee. Right now each region has one representative regardless of technical capability.. Perhaps they should appoint people to a reorganized S&T Committee based on technical capability rather than regional affiliation. A second idea would be to change the role of the committee from one that develops issues to one that facilitates the development of issues. Issues might be assigned to technical working groups created by the S&T Committee. The working groups would be charged with developing issues more completely before they are brought to the S&T Committee for final consideration. The Board is open to ideas.

The Board of Directors has created working groups to address several issues of concern. Among these are: How can we increase the participation by federal agencies in issue development and resolution?; What are the issues and strategies we should pursue as we consider OIML harmonization?; What are the problems and issues associated with Software traceability?; How do we verify software?; What is the current conditions of devices in the field?; What is the net quantity and labeling compliance in the country?

They have developed criteria for establishment and funding of these Board of Directors Working Groups. Those criteria include: Is there stakeholder interest in participating?; What is the time frame for completion?; Are the tasks well defined?; Who funds it?; What are the benefits vs. costs of the outcome?

Henry Oppermann Reports on OIML and NIST Issues at Fall Meeting

Henry Oppermann, Chief, Weights and Measures Division, National Institute of Standards and Technology, provided an update on NIST and OIML activities, as well as his perceptions of problems, issues and opportunities in the national weighing and measuring environment. Some of his points are grouped and summarized below.

Henry is concerned with the deteriorating condition of many weights and measures programs in the country. There are not enough local resources to allow all of the inspection and testing that are needed to insure a fair and equitable marketplace. Some programs are being pressed to generate revenue streams rather than enforce weights and measures requirements. A looming question is "If inspectors are unable to test and enforce everything that is required in Handbook 44, why have the tests or requirements?" This is important as the OIML Mutual Acceptance Arrangement (MAA) is being implemented and national deviations from OIML requirements must be examined. One possible path to resolution is to identify which requirements are "make or break" issues for U.S. enforcement agencies and throw out all those that are not on that list.

As a result of decreased funding, weights and measures programs have to reevaluate their approach to inspection. One possible approach is to move towards risk-based inspections coupled with statistical sampling as opposed to 100% device testing. However, this approach to inspection needs a lot of data to determine where the risks are. This implies the sharing of inspection results and comparing data among jurisdictions. This cannot happen now because there is a lack of uniformity in the collection of data and in the manner in which some inspections are conducted. This is an area that should be addressed in the future. The Professional Development Committee has this topic on its agenda.

WMD and the U.S. National Working Groups are working towards uniform international standards for each category of weighing or measuring instrument for acceptance and testing. The issue is how to align or harmonize U.S. and OIML standards. If U.S. and OIML Standards are eventually harmonized, we must examine how weights and measures issues will be addressed and resolved in the future.

Since OIML is a treaty organization, NIST is examining its responsibility to ensure that each U.S. issuing authority is qualified to issue OIML certificates. Under the OIML Certificate System, BIML allows one issuing authority per country per OIML Recommendation. Will NTEP want to undertake the work and expense to become an OIML issuing authority for the categories of devices for which it currently evaluates under NTEP? Are one or more NTEP labs interested in meeting the OIML criteria to evaluate instruments to R60 and R76? The NIST Force Lab is not gearing up to do testing of the latest version of R60 since it cannot justify the expense vs. income. Currently, they only do NTEP tests for three to five companies per year. What is the level of industry support to establish and use U.S. test facilities for evaluations to OIML Recommendations? Where will industry go for evaluations if they have several laboratories as options for OIML tests? Answers to these questions are needed before decisions can be made on whether or not OIML testing with be done within the United States.

At the OIML Conference, there were questions regarding the value of the Mutual Acceptance Arrangement (MAA). For the European countries, the OIML Certificate System works well and they do not need the MAA with its potential increased costs of 500 euros per device certificate. Moreover, some European laboratories have a turnaround time of six to eight weeks for OIML evaluations versus a longer turnaround time for NTEP evaluations from U.S. laboratories. NTEP must determine if their laboratories can compete with these time frames.

Recently, the technical issues at regional weights and measures association meetings have had very little discussion. One concern is that many of the people at these meetings may not be technically qualified to deal with these issues. Perhaps national working groups of technical experts should be tasked to deal with the development of technical issues while the regional meetings focus on issues towards dealing with regional and national coordination on education, conformity assessment, enforcement, uniformity, and management issues. Additionally, the regional associations could stress tutorials and discussions of implementing requirements.

In line with this, Handbook 82 "Weights and Measures Administration" needs to be updated. It was last updated in 1962. NIST hopes to update Handbook 82 in the next two years. The results of the weights and measures benchmark study, the discussions at the administrators' workshops, and the output of the NIST focus groups provide an extensive list of issues to be addressed in an updated administration manual.

SMA POSITIONS ON SELECTED ITEMS OF INTEREST TO SMA ON THE AGENDA OF THE S&T COMMITTEE OF THE 90th NATIONAL CONFERENCE OF WEIGHTS AND MEASURES INTERIM MEETING

310 General Code

310-1 G-S.1. Identification; Built-for-Purpose Software-Based Devices, Table G-S.1. Identification, G-S.2.2. Location of Marking Information for Not-Built-For-Purpose, Software-Based Devices, and Appendix D; Definition of Not-Built-for-Purpose Device

The SMA opposes this item in its current form and recommends a Conference Work Group be formed to further develop this item

310-2 G-T.1.(e) Acceptance Tolerances

The SMA has no position.

320 Scale Code

320-1 S.1.1. (c) Zero Indication; Requirements for Markings or Indications for Other than Software-Based Devices, and Appendix D; Definition of Not-Built-for-Purpose Device

The SMA opposes this item.

Rationale: The current process as allowed by S.1.1.c. prevents facilitation of fraud.

320-2 S.1.8.4. Recorded Representations, Point-of-Sale Systems; Footnote 1

The SMA supports the item with the changes recommended by the Western and Central Weights and Measures Associations.

320-3 S.1.8.5. Computing Scale Interfaced to a Cash Register

The SMA opposes this item. The SMA recommends that S.1.8.5 should read " Computing Scales Interfaced to a Cash Register - a computing scale may interface with a cash register provided **all displayed and recorded indications agree."**

Rationale: The details of the proposed measure inadvertently impose design restrictions.

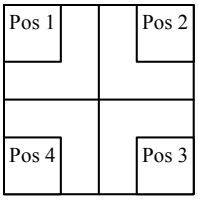
320-4 S.2.1.3. Scales Equipped with an Automatic Zero-Setting Mechanism (Zero Tracking), S.2.1.3.1. For Scales Manufactured Before January 1, 200X ; Maximum Load Rezeroed, S.2.1.3.2. For Scales Manufactured After January 1, 200X ; Maximum Load Rezeroed, and S.2.1.3.3. Automatic Zero-Setting Mechanism (Zero Tracking) on Class III L Devices

The SMA believes that this is an OIML harmonization issue and has no technical justification. The SMA supports harmonization but is concerned about the potential for unnecessary evaluation costs. The SMA supports this step towards harmonization provided additional evaluation of existing devices is waived by NTEP.

320-5 Table S.6.3.b. Notes For Table S.6.3.a. Note 3; Nominal Capacity and Value of the Scale Division and Appendix D ; Definition of Reading Face

The SMA supports the Weighing Sector proposal but we ask for a clarification of the meaning of the phrase "already apparent by the design."

320-6 N.1.3.1. Bench or Counter Scales, N.1.3.8. All Other Scales Except Crane Scales, Hanging Scales, Hopper Scales, Wheel–Load Weighers, and Portable Axle-Load Weighers, and Appendix D; Definitions of Bench Scale and Counter Scale



1. The SMA supports the Weighing Sector Proposal.

2. The SMA believes the Figure 2 is in error and is inconsistent with the wording of the proposal The weight positions should be moved to the outside corners and the Load Bearing Points should be removed since they are irrelevant.

3. The SMA believes that the terminology should be consistent. In N.1.3.~~8~~7.a. there is a reference to "quarter" while in N.1.3.~~8~~7.b. the same reference is to "segment". The SMA recommends that the term "quadrant" should be used in both instances.

Comment: As modified by the Weighing Sector, this proposal advances a shift test that is design independent. It is an improvement over the design oriented requirement of R76. In the spirit of harmonization, SMA recommends that the NIST Weights and Measures Division propose this change to OIML.

320-7 Table 6 Maintenance Tolerances

The SMA opposes this item.

Rationale: A change of this magnitude is premature with regard to harmonization. Other harmonization issues should take precedence.

320-8 T.N.4.5. Time Dependence, T.N.4.5.1. Non-automatic Instruments Class II, III, and IIII Indications, T.N.4.5.2. Weighing Instrument Class III Indications, T.N.4.6. Time Dependence (Creep) for Load Cells During Type Evaluation, T.N.4.6.1. Reading Error, and T.N.4.6.2. MPE Using Apportionment Factors

The SMA agrees with the proposed tolerances. However, we believe that T.N.4.5. Time Dependence should be rewritten to state "**A Time Dependence Test shall be conducted during Type Evaluation.**" The remainder of the proposals T.N.4.5.1.1 thru T.N.4.6.2 should be consigned to Publication 14 via the Weighing Sector.

Rationale: While Publication 14 requirements should be traceable to Handbook 44, there is no need to overload Handbook 44 to provide the traceability. The SMA proposal provides the appropriate traceability. Moreover, the SMA believes that this is an OIML harmonization issue. The SMA supports harmonization but is concerned about the potential for unnecessary evaluation costs. The SMA supports this step towards harmonization provided additional evaluation of existing devices is waived by NTEP.

320-9 List of International Symbols Noted as Acceptable

The SMA has no position.

360 Other Items

360-4 Add International Terms that are Synonyms to NIST Handbook 44 Terms to Appendix D; Definitions

The SMA supports the work of the international working group and looks forward to reviewing the final product as an informational item.

360-5 Developing Issues Part 2, Scale Code: Modify Table 4 Minimum Test Weights and Test Loads

The SMA opposes this item and recommends that it be withdrawn.

Rationale: The SMA, like the CWMA, questions why a limit was set on the device's capacity since the current table 4 recognizes device capacities greater than 40,000 lb.