

NEWMA Specifications and Tolerances (S&T) Committee 2021 Interim Meeting Report

Mr. Jim Willis, Committee Chair
New York

INTRODUCTION

The S&T Committee (hereinafter referred to as the “Committee”) submits this Committee Annual Report for consideration by National Conference on Weights and Measures (NCWM). This report contains the items discussed and actions proposed by the Committee during the Annual Meeting. The report will address the items in Table A during the Interim Meeting. Table A identifies the agenda items by reference key, title of item, page number and the appendices by appendix designations. The acronyms for organizations and technical terms used throughout the agenda are identified in Table B. The headings and subjects apply to NIST Handbook 44 *Specifications, Tolerances, and Other Technical Requirements for Weighing and Measuring Devices*. The first three letters of an item’s reference key are assigned from the Subject Series List. The status of each item contained in the report is designated as one of the following: **(D) Developing Item:** the Committee determined the item has merit; however, the item was returned to the submitter or other designated party for further development before any action can be taken at the national level; **(A) Assigned Item:** the committee has assigned development of the item to a recognized subcommittee or task group within NCWM. **(I) Informational Item:** the item is under consideration by the Committee but not proposed for Voting; **(V) Voting Item:** the committee is making recommendations requiring a vote by the active members of NCWM; **(W) Withdrawn Item:** the item has been removed from consideration by the Committee.

Some Voting Items are considered individually; others may be grouped in a consent calendar. Consent calendar items are Voting Items that the Committee has assembled as a single Voting Item during their deliberation after the Open Hearings on the assumption that the items are without opposition and will not require discussion. The Voting Items that have been grouped into consent calendar items will be listed on the addendum sheets. Prior to adoption of the consent calendar, the Committee will remove specific items from the consent calendar upon request to be discussed and voted upon individually.

Committees may change the status designation of agenda items (Developing, Informational, Assigned, Voting and Withdrawn) up until the report is adopted, except that items which are marked Developing, Informational, Assigned or Withdrawn cannot be changed to Voting Status. Any change from the Committee Interim Report (as contained in this publication) or from what appears on the addendum sheets will be explained to the attendees prior to a motion and will be acted upon by the active members of NCWM prior to calling for the vote.

An “Item under Consideration” is a statement of proposal and not necessarily a recommendation of the Committee. Suggested revisions are shown in **bold face print** by ~~striking out~~ information to be deleted and underlining information to be added. Requirements that are proposed to be nonretroactive are printed in ***bold faced italics***. Additional letters, presentation and data may have been submitted for consideration with this item. Please refer to <https://www.ncwm.com/publication-16> to review these documents.

All sessions are open to registered attendees of the conference. If the Committee must discuss any issue that involves proprietary information or other confidential material; that portion of the session dealing with the special issue may be closed if (1) the Chairman or, in his absence, the Chairman-Elect approves; (2) the Executive Director is notified; and (3) an announcement of the closed meeting is posted on or near the door to the meeting session and at the registration desk. If possible, the posting will be done at least a day prior to the planned closed session.

Note: It is policy to use metric units of measurement in publications; however, recommendations received by NCWM technical committees and regional weights and measures associations have been printed in this publication as submitted. Therefore, the report may contain references to inch-pound units.

Subject Series List

Handbook 44 – General Code.....	GEN Series
Scales.....	SCL Series
Belt-Conveyor Scale Systems	BCS Series
Automatic Bulk Weighing Systems	ABW Series
Weights.....	WTS Series
Automatic Weighing Systems	AWS Series
Weigh-In-Motion Systems used for Vehicle Enforcement Screening.....	WIM Series
Liquid-Measuring Devices	LMD Series
Vehicle-Tank Meters	VTM Series
Liquefied Petroleum Gas and Anhydrous Ammonia Liquid-Measuring Devices	LPG Series
Hydrocarbon Gas Vapor-Measuring Devices.....	HGV Series
Cryogenic Liquid-Measuring Devices.....	CLM Series
Milk Meters	MLK Series
Water Meters	WTR Series
Mass Flow Meters	MFM Series
Carbon Dioxide Liquid-Measuring Devices.....	CDL Series
Hydrogen Gas-Metering Devices	HGM Series
Electric Vehicle Refueling Systems	EVF Series
Vehicle Tanks Used as Measures	VTU Series
Liquid Measures	LQM Series
Farm Milk Tanks	FMT Series
Measure-Containers.....	MRC Series
Graduates.....	GDT Series
Dry Measures	DRY Series
Berry Baskets and Boxes.....	BBB Series
Fabric-Measuring Devices.....	FAB Series
Wire-and Cordage-Measuring Devices	WAC Series
Linear Measures	LIN Series
Odometers	ODO Series
Taximeters.....	TXI Series
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Grain Moisture Meters (a).....	GMA Series
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Near-Infrared Grain Analyzers.....	NIR Series
Multiple Dimension Measuring Devices	MDM Series
Electronic Livestock, Meat, and Poultry Evaluation Systems and/or Devices	LVS Series
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Table B
Glossary of Acronyms and Terms

Acronym	Term	Acronym	Term
ABWS	Automatic Bulk Weighing System	NEWMA	Northeastern Weights and Measures Association
AAR	Association of American Railroads	NIST	National Institute of Standards and Technology
API	American Petroleum Institute	NTEP	National Type Evaluation Program
CNG	Compressed Natural Gas	OIML	International Organization of Legal Metrology
CWMA	Central Weights and Measures Association	OWM	Office of Weights and Measures
EPO	Examination Procedure Outline	RMFD	Retail Motor Fuel Dispenser
FHWA	Federal Highway Administration	S&T	Specifications and Tolerances
GMM	Grain Moisture Meter	SD	Secure Digital
GPS	Global Positioning System	SI	International System of Units
HB	Handbook	SMA	Scale Manufacturers Association
LMD	Liquid Measuring Devices	SWMA	Southern Weights and Measures Association
LNG	Liquefied Natural Gas	TC	Technical Committee
LPG	Liquefied Petroleum Gas	USNWG	U.S. National Work Group
MMA	Meter Manufacturers Association	VTM	Vehicle Tank Meter
MDMD	Multiple Dimension Measuring Device	WIM	Weigh-in-Motion
NCWM	National Conference on Weights and Measures	WWMA	Western Weights and Measures Association

Details of All Items
(In order by Reference Key)

GEN – GENERAL CODE

GEN-22.1 V G.A.1. Commercial and Law-Enforcement Equipment.

Source:

NIST, Office of Weights and Measures

Purpose:

This proposed change is intended to add clarification regarding the implications of using weighing and measuring devices for transactions that may be considered by some as commercial while there is no clear guidance provided.

Item Under Consideration:

Amend Handbook 44, General Code as follows:

G-A.1. Commercial and Law-Enforcement Equipment. – These specifications, tolerances, and other technical requirements apply as follows.

(1) To commercial weighing and measuring equipment; that is:

(a) To weights and measures and weighing and measuring devices commercially used or employed in:

1. establishing the size, quantity, extent, area, composition (limited to meat and poultry), constituent values (limited to grain), or measurement of quantities, things, produce, or articles for distribution or consumption, purchased, offered, or submitted for sale, hire, or award;

2. **assessing a fee for the use of the equipment to determine a weight or measure;**

3. **determining the basis of an award using count, weight, or measure; or**

4. computing any basic charge or payment for services rendered on the basis of weight or measure.
(Amended 2008 **and 20XX**)

(b) To any accessory attached to or used in connection with a commercial weighing or measuring device when such accessory is so designed that its operation affects the accuracy of the device.

(2) To weighing and measuring equipment in official use for the enforcement of law or ~~for~~ the collection of statistical information by government agencies.

(These requirements should be used as a guide by the weights and measures official when, upon request, courtesy examinations of noncommercial equipment are made.)

Previous Action:

Item under consideration presented to 2022 NCWM Interim meeting as:

G-A.1. Commercial and Law-Enforcement Equipment. – These specifications, tolerances, and other technical requirements apply as follows:

(a) To commercial weighing and measuring equipment; that is, to weights and measures and weighing and measuring devices commercially used or employed in establishing the size, quantity, extent, area,

composition (limited to meat and poultry), constituent values (limited to grain), or measurement of quantities, things, produce, or articles for distribution or consumption, purchased, offered, or submitted for sale, ~~hire, or award, or in computing any basic charge or payment for services rendered on the basis of weight or measure.~~

(Amended 2008 and 20XX)

(b) **To other commercial weighing and measuring equipment:**

i. when there is a fee assessed for the use of the equipment to determine a weight or measure;

ii. used to determine the bases of an award using count, weight, or measure; or

iii. used in computing any basic charge or payment for services rendered on the basis of weight or measure

(Added 20XX)

~~(b)~~ To any accessory attached to or used in connection with a commercial weighing or measuring device when such accessory is so designed that its operation affects the accuracy of the device.

~~(e)~~ To weighing and measuring equipment in official use for the enforcement of law or for the collection of statistical information by government agencies.

(These requirements should be used as a guide by the weights and measures official when, upon request, courtesy examinations of noncommercial equipment are made.)

Original Justification:

OWM has noted a number of inquiries submitted to our office for explanation on the many and various issues involved with the use of weighing or measuring devices as commercial devices when there is charge for doing so. Law enforcement devices may be regulated in a different manner than commercial devices (e.g., allows highway weight limit enforcement through multi-draft weighing) when commercial devices are not allowed to be used in that way.

The submitter pointed out that there seems to be a difference in opinions regarding this practice constitutes a commercial transaction.

The submitter requested voting status for these items in 2022.

Comments in Favor:

Regulatory:

-

Industry:

- The item received support from multiple sources across industry.

Advisory:

- Submitter spoke in support of separating the item from its Block 6 companions and giving it a voting status.

Comments Against:

Regulatory:

-

Industry:

-

Advisory:

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Neutral Comments:

Regulatory:

- Advice was heard and supported to align GEN 22.1 language with companion L&R item WAM 22.1. Multiple comments were heard supporting the continued development of the item in order to align and clarify language to avoid any confusion. There was an emphasis on defining non-commercial vs. commercial.

Industry:

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Advisory:

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Item Development:

NCWM 2022 Interim Meeting: During the S&T Committee work session, the committee agreed to remove item GEN 22.1 from Block 6. The committee recommendations pertain only to item GEN 22.1 and not to Block 6. The committee recommends a voting status for GEN 22.1 with the revised version shown initially as the item under consideration and the original version shown subsequently as previous action. Updates were for clarity and to match language in Laws and Regulations Block 2 item WAM 22.1.

NEWMA Report: GEN-22.1

Regional recommendation to NCWM on item status:

- ☒ Recommend as a Voting Item on the NCWM agenda
- ☐ Recommend as an Information Item on the NCWM agenda
- ☐ Recommend as an Assigned Item on the NCWM agenda
(To be developed by an NCWM Task Group or Subcommittee)
- ☐ Recommend as a Developing Item on the NCWM agenda
(To be developed by source of the proposal)
- ☐ Recommend Withdrawal of the Item from the NCWM agenda
(In the case of new proposals, do not forward this item to NCWM)
- ☐ No recommendation from the region to NCWM
(If this is a new proposal, it will not be forwarded to the national committee by this region)

Comments and justification for the regional recommendation to NCWM: (This will appear in NCWM reports)

Ms. Tina Butcher (NIST OWM) commented that the intent is to remove ambiguity as there is an expectation for customers to receive an accurate weight when not used as a typical commercial device. She believes the item is ready as presented and language aligns with L&R items with terms “commercial” and “law enforcement”. Mr. Russ Vires (SMA) commented that SMA supports the item as voting as it provides clarity of what constitutes a commercial transaction. Mr. John McGuire (NJ) commented as the NCWM L&R Chair and indicated that both NCWM L&R and S&T committees met in February 2022 to align this item with the L&R items.

After hearing comments from the floor, the committee considered the item to be fully developed and recommended that the item retains voting status.

Additional letters, presentation and data may have been submitted for consideration with this item. Please refer to <https://www.ncwm.com/publication-16> to review these documents.

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., ~~transfer standard,~~ and standard, transfer,

This item was modified and combined with Item OTH-22.1 and resides in Block 8.

SCL – SCALES

SCL-20.9 W S.1.1.3. Zero Indication, Load Receiving Elements Separate from Weighing Elements. and Appendix D – Definitions: no load reference value

NOTE: This item was carried over from the 2020 Interim Meeting however, it was not a Voting item and therefore not discussed during the continuation of the 2020 Annual Meeting. Instead, the item was placed on the 2021 Interim Meeting's agenda and was discussed during that meeting.

The original 2021 Interim Meeting Report did not include the updated Item Under Discussion. It was corrected for Publication 16 on May 27, 2021.

Source:

Kansas Department of Agriculture

Purpose:

This item is intended to be applied to weighing devices utilizing a hopper that, once programmed, weigh in multiple drafts to complete the weighing cycle (automatic operation) and that in the course of the normal weighing cycle may not return to zero because of material remaining in the hopper.

Item Under Consideration:

Amend Handbook 44, Scales Code as follows:

S.1.1.2. No-Load Reference Value. –

S.1.1.2.1. Single Draft Manually Operated Receiving Hopper.- On a single draft manually operated receiving hopper scale installed below grade, used to receive grain, and utilizing a no-load reference value, provision shall be made to indicate and record the no-load reference value prior to the gross load value.
(Added 1983)

S.1.1.2.2. Digital Indicating Hopper Scales Designed for Automatic Operation- Provisions shall be made to indicate and record a no-load reference value on both sides of zero
(Nonretroactive as of January 1, 20XX)

S.2.1. Zero-Load Adjustment.

S.2.1.7. Digital Indicating Hopper Scales Designed for Automatic Operation. - The weighing system shall be equipped with semiautomatic means by which the zero-load may be adjusted when the indication is stable within plus or minus 1.0 scale division and the weighing cycle is not in operation.

Automatic zero-tracking and automatic zero-setting mechanisms shall not operate during the weighing cycle.
(Nonretroactive as of January 1, 20XX)

S.2.6. Weighing and Recording Sequence for Digital Indicating Hopper Scales Designed for Automatic Operation

S.2.6.1. Weighing Sequence. – For weighing systems used to receive (weigh in), the no-load reference value shall be determined and recorded only at the beginning of each weighing cycle. For systems used to deliver (weigh out), the no-load reference value shall be determined and recorded only after the gross load reference value for each weighing cycle has been indicated and recorded.
(Nonretroactive as of January 1, 20XX)

S.2.6.2. Recording Sequence. – Provision shall be made so that all weight values are indicated until the completion of the recording of the indicated value.
(Nonretroactive as of January 1, 20XX)

S.3.4. Interlocks and Flow Control-Digital Indicating Hopper Scales Designed for Automatic Operation.

S.3.1. Flow Control. – Provision shall be made to clearly indicate to the operator the status of product flow to and from the weigh hopper.

S.3.2. Interlocks. – Each system shall have operating interlocks to provide for the following:

(a) Product cannot be cycled and weighed if the weight recording element is disconnected or subjected to a power loss.

(b) The recording element cannot print a weight if either of the flow control mechanism leading directly to or from the weigh hopper is operating.

(c) A “low paper” sensor, when provided, is activated.

(d) The system will operate only in the proper sequence in all modes of operation.

(e) When an overfill alarm is activated, the system shall indicate and record an overfill condition.

S.3.5. Overfill Sensor.

(a) The load-receiving element shall be equipped with an overfill sensor which will cause the flow control mechanism filling the load-receiving element to become inactive, activate an alarm, and inhibit weighing until the overfill condition has been corrected.

(b) If the system is equipped with a lower garner or surge bin, that garner shall also be equipped with an overfill sensor which will cause the flow control mechanism emptying the load-receiving element to remain open, activate an alarm, and inhibit weighing until the overfill condition has been corrected.
[Nonretroactive as of January 1, 20XX]

And amend Appendix D – Definitions as follows:

no-load reference value. – A positive or negative weight value indication with no load in the load-receiving element of a scale. ~~(Used with automatic bulk weighing systems and certain single draft, manually-operated receiving hopper scales installed below grade and used to receive grain.)~~ [2.20, 2.22]

Background/Discussion:

This item has been assigned to the submitter for further development. For more information or to provide comment, please contact:

Mr. Doug Musick
 Kansas Department of Agriculture
 785-564-6681, doug.musick@ks.gov

There are many devices currently in use that, when not returned to zero, produce an inaccurate weighment. For example, a hopper scale used to weigh aluminum cans. The hoppers of these scales tend to become very sticky from residue and cans may stick to the side. When the indicator does not return to zero the operator will typically re-zero the scale to begin the next weighment. If the operator does not notice the device didn't return to zero, they may pay for the same cans more than once. If the device is re-zeroed with the can still stuck and it is knocked loose later, the customer may be paid for less material than they brought to the facility if the operator does not notice the indicator is below zero. If properly operated, a system utilizing a load-receiving element separate from a weighing element can be used to determine an accurate net weight.

In some cases, the load receiving element of a scale will retain materials (in the case of a hopper scale often referred to as the "heel"). This is typically a positive value but if the operator manually re-zero's the indicator and the material is subsequently cleared this can result in a negative value and should be accounted for when determining a net weight.

NCWM 2020 Interim Meeting: The submitter (Mr. Musick) stated the intent of this item was directed towards weighing systems utilizing hoppers and tanks and that his understanding of the NIST OWM analysis is that the intent of the proposal may not have been clear and will work towards clarifying the purpose of the item. Mr. Musick requested the committee assign a Developing Status. A representative of the NIST OWM indicated he had discussed the item with the submitter and is willing to work with him to assist in the development of the item.

A representative of the SMA commented that their group is opposed to the item because the intent is not understood.

During the Committee's work session, the committee assigned this item a Developing status.

NCWM 2020 Annual Meeting: Due to the 2020 Covid-19 pandemic, this meeting was adjourned to January 2021, at which time it was held as a virtual meeting. Due to constraint of time, only those items designated as 2020 Voting Items were addressed. All other items were addressed in the subsequent 2021 NCWM Interim Meeting.

2021 NCWM Interim Meeting: The Committee heard testimony in the open hearing session from Mr. Loren Minnich (Kansas, submitter) stating that this proposal would replace another proposal from this submitter (ABW-16.1) which the submitter is recommending Withdraw. Mr. Minnich recommended an Information or Developing status for this item. Mr. Russ Vires (SMA) stated that the SMA takes no position on this item. Mr. Kevin Schnepf (California Division of Measurement Standards) supports a Developing status for the item.

During the 2021 Interim Meeting work session, the Committee recommended the submitter continue to work with NIST OWM to further develop this item and agreed the item should remain as a Developing status.

2022 NCWM Interim Meeting: The committee heard from Loren Minnich (Kansas, submitter) that he requested the item be withdrawn. Russ Vires (SMA) stated they oppose the item and feel it is an application issue. The Committee agreed to withdraw this item.

Regional Association Comments:

WWMA 2021 Annual Meeting: Russell Vires (SMA): carryover item. SMA opposes item in current form. The potential problem is an application issue and not specification issue. Their position is recorded on the NCWM website.

The WWMA S&T Committee recommends the status remain developmental so that the submitter can continue to work on this as they have previously stated.

SWMA 2021 Annual Meeting: Russ Vires, SMA, stated that he opposes this item because he believes its an application issue, not a specifications issue, citing that the submitter has requested it remain developmental.

This committee recommends this item remain a Developing status.

CWMA 2021 Interim Meeting: Loren Minnich-Kansas (submitter) suggested withdraw. Lou Straub-SMA does not support item, feels it's an application issue not a specifications item.

CWMA S&T Committee supports the submitter request to withdraw.

NEWMA 2021 Interim Meeting: During the NEWMA S&T open hearings, no comments were heard, and the submitter was not available.

The NEWMA Specifications and Tolerances Committee recommends that this item remain in Developing Status.

Additional letters, presentation and data may have been submitted for consideration with this item. Please refer to <https://www.ncwm.com/publication-16> to review these documents.

SCL-22.2 A UR.1. Selection Requirements, UR.1.X. Cannabis

Source:

NCWM Cannabis Task Group

Purpose:

Establish uniform scale suitability requirements among the states for sales of cannabis.

Item Under Consideration:

Amend Handbook 44, Scales Code as follows:

UR.1. Selection Requirements. Equipment shall be suitable for the service in which it is used with respect to elements of its design, including but not limited to, its capacity, number of scale divisions, value of the scale division or verification scale division, minimum capacity, and computing capability.⁴

...

UR.1.X. Cannabis. – The scale division for scales weighing Cannabis shall not exceed:

(a) **0.01g for net weighments up to capacity,**

(b) **0.1g for net weighments greater than 10g, up to capacity, and**

(c) **1g for net weighments greater than 100g, up to capacity.**

(Added 20XX)

Previous Action:

New

Original Justification:

As states legalize sales of cannabis in its various forms, the need has arisen for uniform standards for scale suitability. Uniform requirements from one state to the next, will strengthen each jurisdiction's ability to effectively regulate the industry in a fair and equitable manner. Uniform standards also provide industry with expectations regardless of the jurisdiction, reducing potential conflict or confusion.

Some states may already have scale suitability requirements differing for those proposed here. The task group is hopeful that differences can be resolved so that the standards are the same in every jurisdiction:

The proposed suitability requirements are based on existing standards as set forth by the California Division of Standards, Division of Measurement Standards.

The submitter requested that this item be a Developing Item.

Comments in Favor:

Regulatory:

- 2022 Interim: Several regulatory officials voiced support of continuing to develop this item. The State of Kansas noted that HB44 scale code Table 8 contains “recommended” minimum loads and cannot be used for enforcement. A suggestion was made to use e verification interval (instead of d) for the code application.

Industry:

- 2022 Interim: The Scale Manufacturers Association supports developing the item and recommended aligning the item with HB44 Table 8, Recommended Minimum Load.

Advisory:

-

Comments Against:

Regulatory:

-

Industry:

- 2022 Interim: The Committee heard comments from industry members that do not support this item. An industry member indicated that this proposal is an unprecedented requirement for devices for a specific industry. A&D noted that if the item progresses, they would suggest a minimum scale division of 0.01 g for weighments up to 100 g.

Advisory:

- 2022 Interim: NIST OWM reiterated their written analysis of this item and recommends it being considered as a guidance document only. The full analysis can be found on the NCWM website.

Neutral Comments:

Regulatory:

- 2022 Interim: Some regulators voiced concern that this item should apply not only to cannabis but to all commodities that are of high cost.

Industry:

-

Advisory:

-

Item Development:

NCWM 2022 Interim Meeting: After hearing comments from the floor and referencing submitted supporting documents, the Committee has assigned this item back to the NCWM Cannabis Task Group for further development. The Task Group should consider the several proposals for alternate language that were provided by the regional associations. For more information or to provide comment, please contact:

James Cassidy
NCWM Cannabis Task Group
James.cassidy@mass.gov

Charles Rutherford
NCWM Cannabis Task Group
charlie@cprsquaredinc.com

Regional Associations' Comments:

WWMA 2021 Annual Meeting: Josh Nelson (Ex-Officio NCWM S&T Committee) : put forward to address some issues for cannabis, recommend developing - still needs work and continue to work forward. Matt Douglas (California - DMS) : California supports further development, add non retroactive date - subsection A states up to capacity... lists suitability requirements based on California, however, this info is not a standard. Eric Golden (Cardinal Scales) : section A B and C, be better to say 0.1 g for net weighments up to 10 grams, then B 10 to 100 grams, then C say over 100, etc. Kurt Floren (LA County) : Mr. Golden stated perfectly what is lacking. There has to be ranges put in as to where the graduations are appropriate. Erin Sullivan (CO Department of Agriculture) : does this pertain to cannabis in any form or concentration? Josh Nelson (Ex-Officio NCWM S&T Committee) : this is what is going into HB44 - each jurisdiction has to define their own. For Oregon, medical is much different than retail. Retail has to abide by this. Med. Does not. Verbiage in A B and C does need additions. Erin Sullivan (CO Department of Agriculture) : grows vs. dispensaries? Different products in processing facilities are weighed with many containers on the scales. Do states determine the regulation? Josh Nelson (Ex-Officio NCWM S&T Committee) : up to the states to determine how to apply tares and increments in which product is weighed. Kurt Floren (LA County): cannabis products: later we'll see proposed def. of cannabis and cannabis products, are we anticipating the adoption of the proposed language? Josh Nelson (Ex-Officio NCWM S&T Committee) : it is not limited to flowers or bud. Mentions dabs. Is there a packaging requirement for the label? Oregon does. There must be a legal for trade scale that can prove they are meeting net contents. They must ensure that their process is being executed correctly. He thinks this is not limited to flower/bud. Kurt Floren (LA County): this raises the point that further consideration needs to be put into terms. Brownies, cannabis infused pizza.. And other items sold by weight. Are we setting the terms for pure cannabis product or are the scales being used for any cannabis containing product? Josh Nelson (Ex-Officio NCWM S&T Committee) : welcomes written input for this topic from anyone. Josh will continue to develop this. Eric Golden (Cardinal Scales) : clarification on Mr. Nelson: geared towards net sales, packaging for the customer. Is this part of the track and trace program for growers or just for retail? Josh Nelson (Ex-Officio NCWM S&T Committee) : needs to be expanded upon, in Oregon: even the growers have to do track and trace. Any scale weight that is used for the cannabis tracking system needs to be Weights and Measures compliant. Maybe has to address even a class III scale. They will look more into it. Joe Moreo (Ag. Com. Sealer) : over time we are going to need one level for concentrates, one for food, one for flower, one size fits all will not work. Josh Nelson (Ex-Officio NCWM S&T Committee) : Agrees that one size does not fit all. This will start to give limitations as to what a particular weight will be. Not trying to pigeon hole any device into one category, just trying to figure out what works, that's the intent.

The WWMA S&T Committee recommends the item be assigned a developmental status so that the submitter can continue to work on this as they commented during open hearings.

SWMA 2021 Annual Meeting: Russ Vires, SMA, stated that they have no position on this item at this time. Matt Curran, State of Florida, stated that he supports this as a Voting item. He also provided comments in support of this item from Eric Golden, Cardinal Scale. Cardinal offered some changes as well. The suggested changes are as follows:

UR.1.X. Cannabis. – The scale division for scales weighing Cannabis shall not exceed:

- (a) **0.01g for net weighments ~~up to capacity~~ up to 10g.**
- (b) **0.1g for net weighments greater than 10g, up to 100g, ~~capacity, and~~**
- (c) **1g for net weighments greater than 100g, up to capacity.**
(Added 20XX)

Charlie Rutherford, Cannabis Committee, stated that he supports this item moving forward as a voting item with the changes suggested by Cardinal Scale and Dr. Curran.

This committee recommends that this item be moved forward as a Voting item if the changes suggested above are made.

CWMA 2021 Interim Meeting: Loren Minnich-Kansas stated he's not sure of the intent and that it needs more developing. Eric Golden-Cardinal Scales agreed with Loren, is it "e" or "d", will send notes to committee. Ivan Hankins-Iowa would support item with Eric Golden language. Eric Golden continued by recommending the following change to which will add clarity to the listed weight ranges in SCL22.2 (in red)

SCL-22.2 UR.1. Selection Requirements, UR.1.X. Cannabis

UR.1.X. Cannabis. – The ~~scale-division verification scale interval, e, for scales weighing Cannabis shall not exceed:~~

- (a) 0.01g for net weighments ~~up to capacity up to 10g,~~
 - (b) 0.1g for net weighments greater than 10g, up to ~~100g, capacity, and~~
 - (c) 1g for net weighments greater than 100g, up to capacity.
- (Added 20XX)**

CWMA S&T Committee recommends as voting item with the proposed changes from Cardinal Scales.

NEWMA 2021 Interim Meeting: Eric Golden (Cardinal Scale)- Made suggestions to change the language in this item to the following:

UR.1.X Cannabis.....

- (a) 0.01g for net weighments up to 10 g
- (b) 0.1g for net weighments greater than 10g , up to 100 g, and
- (c) 1 g for net weighments greater than 100g , up to capacity

Lou Sakin (Hopkinton/Northbridge, MA) commented that he agrees with changes above.

Discussions were heard regarding the agreement with table 8 in scale code as this requirement is more restrictive than table 8 parameters. Eric Golden (Cardinal Scale) commented that national uniformity would be good and many states have informational publications that outline requirements in their state for Cannabis scale requirements. Jimmy Cassidy (MA) recommends voting status with the changes above. Matt Curran (FL) commented that harmonization with table 8 would be a good idea if possible. Lou Sakin (Hopkinton/Northbridge, MA) questioned if Cannabis should be in *italics*. The Committee suggests making the change to italics for *Cannabis*.

The NEWMA Specifications and Tolerances Committee recommends that this item be given Voting Status with suggested edits.

NEWMA Report: SCL-22.2	
Regional recommendation to NCWM on item status:	
<input type="checkbox"/> Recommend as a Voting Item on the NCWM agenda <input type="checkbox"/> Recommend as an Information Item on the NCWM agenda <input checked="" type="checkbox"/> Recommend as an Assigned Item on the NCWM agenda <i>(To be developed by an NCWM Task Group or Subcommittee)</i> <input type="checkbox"/> Recommend as a Developing Item on the NCWM agenda <i>(To be developed by source of the proposal)</i> <input type="checkbox"/> Recommend Withdrawal of the Item from the NCWM agenda <i>(In the case of new proposals, do not forward this item to NCWM)</i> <input type="checkbox"/> No recommendation from the region to NCWM <i>(If this is a new proposal, it will not be forwarded to the national committee by this region)</i>	
Comments and justification for the regional recommendation to NCWM: (This will appear in NCWM reports)	
<p>Mr. James Cassidy (MA) commented as the Co-Chair of the NCWM Cannabis Task Group. He supports the assigned status so the task group can continue to develop the item from comments received at the 2022 Interim. Mr. Russ Vires (SMA) supports continued development and indicated that a user requirement typically does not pertain to a specific commodity. Mr. Vires suggested the words “retail cannabis” should be added to the “Class II” section of Table 7a and the words “bulk cannabis processing and sales” should be added to the “Class III” section of Table 7a. Ms. Tina Butcher (NIST OWM) read the following statement: “As a non-regulatory metrology institute, NIST defers to federal agencies with regulatory authority under the Controlled Substances Act (CSA) for the scheduling of drugs or other substances. NIST does not have a policy role related to the production, sale, distribution, or use of cannabis (including hemp and marijuana). While the 2018 Farm Bill removed hemp from</p>	

the list of controlled substances under Schedule 1 of the CSA, marijuana remains on that list. NIST must respect that distinction even as it exercises its statutory authority to develop and disseminate national weights and measures standards for the production, distribution, and sale of products in the commercial marketplace. NIST remains committed to providing technical assistance to the weights and measures community. OWM has provided key technical points for the community to consider in its deliberations of cannabis-related proposals, and OWM would be happy to provide any necessary clarification. OWM comments are intended to encourage technically sound application of legal metrology laws, regulations, and practices to the measurement and sale of these products.”

After hearing comments from the floor, the committee recognized the need for further development of the item and recommended that the item retain an assigned status. The committee recommends the NCWM Cannabis Task Group work with the SMA and other stakeholders to further develop this item.

Additional letters, presentation and data may have been submitted for consideration with this item. Please refer to <https://www.ncwm.com/publication-16> to review these documents.

LMD – LIQUID MEASURING DEVICES

LMD-21.1 V Table S.2.2. Categories of Device and Method of Sealing

Source:

Gilbarco, Inc.

Purpose:

To modify Category 3 requirements under Methods of Sealing to allow electronic copy of event logger for liquid measuring devices. To enhance or have alternate wording to existing Item LMD-20.1 under review for this item.

Item Under Consideration:

Amend Handbook 44, Liquid Measuring Devices Code as follows:

<i>Table S.2.2. Categories of Device and Methods of Sealing</i>	
<i>Categories of Device</i>	<i>Methods of Sealing</i>
<i>Category 1: No remote configuration capability.</i>	<i>Seal by physical seal or two event counters: one for calibration parameters and one for configuration parameters.</i>

<p>Category 2: Remote configuration capability, but access is controlled by physical hardware.</p> <p><i>The device shall clearly indicate that it is in the remote configuration mode and record such message if capable of printing in this mode or shall not operate while in this mode.</i></p>	<p><i>[The hardware enabling access for remote communication must be on-site. The hardware must be sealed using a physical seal or an event counter for calibration parameters and an event counter for configuration parameters. The event counters may be located either at the individual measuring device or at the system controller; however, an adequate number of counters must be provided to monitor the calibration and configuration parameters of the individual devices at a location. If the counters are located in the system controller rather than at the individual device, means must be provided to generate a hard copy of the information through an on-site device.]*</i></p> <p><i>[*Nonretroactive as of January 1, 1996]</i></p>
<p>Category 3: Remote configuration capability access may be unlimited or controlled through a software switch (e.g., password).</p> <p><i>[Nonretroactive as of January 1, 1995]</i></p> <p><i>The device shall clearly indicate that it is in the remote configuration mode and record such message if capable of printing in this mode or shall not operate while in this mode.</i></p> <p><i>[Nonretroactive as of January 1, 2001]</i></p>	<p>An event logger is required in the device; it must include an event counter (000 to 999), the parameter ID, the date and time of the change, and the new value of the parameter. A printed copy of the information must be available on demand through the device or through another on-site device. The information may also be available electronically. <u>The event logger information shall be available at the time of inspection either as a printed copy or in electronic format. The information may be printed by the device, printed by another on site device, or transmitted electronically.</u> The event logger shall have a capacity to retain records equal to 10 times the number of sealable parameters in the device, but not more than 1000 records are required. (Note: Does not require 1000 changes to be stored for each parameter.)</p>

[Nonretroactive as of January 1, 1995]

(Table Added 1993) (Amended 1995, 1998, 1999, 2006, and 2015)

Original Justification:

Current requirement is that category 3 device must have printed copy made available on site for the event logger information. Category 3 devices are fully connected electronic devices here in the modern age and thus we need to move away from the archaic requirement of only allowing a paper copy for this item. The industry fully supports this change. LMD's have many types of regulatory events that accumulate in the event logger: blend ratio changes, calibration changes for the meters, SW downloads are examples. Often our only available print option is through the device receipt printer. With its tiny width of receipt paper, the event log for an older liquid measuring device will be several feet long and have text that wraps and is difficult to read. Allowing an electronic copy will be more convenient, easily read, and easily saved/retained/shareable.

Wayne Fueling Systems, LLC had a current proposal, Item LMD-20.1 for this item and in discussion with him he has been very supportive of me providing alternate wording above for consideration, or possibly to use in place of his proposal. Hopefully we can hear from Wayne Fueling Systems on this in the upcoming meetings. Also, I am aware of the Electric vehicle charger industry is working on this item to propose allow electronic copy as well.

The submitter requested voting status for this item in 2021.

Previous Action:

- 2021: Developing Item

Comments in Favor:

Regulatory:

- Charlie Stutsman (Kansas) and Matt Douglas (California) supported the item as a voting item

Industry:

- Brent Price (Gilbarco rose in support of the item and encouraged making the item have a voting status. Dmitri Karimov (MMA) stated the industry group was in favor of the item.
- Randy Moses (Wayne Fueling Systems LLC), the submitter of Item LMD-20.1, agreed to withdraw his proposal in favor of this item and will work with the submitter of this item to further develop it. Both companies support electronic logs for Category 3 sealing requirements.

Advisory:

- Written comments were provided by NIST OWM.
- Ms. Diane Lee (NIST OWM) noted that there is a similar proposal on the S&T agenda, Item EVF-21.4 that the committee may want to consider when discussing this item and that OWM agrees with a developing status for this item.

Comments Against:

Regulatory:

-

Industry:

-

Advisory:

-

Neutral Comments:

Regulatory:

-

Industry:

-

Advisory:

-

Item Development:

The Committee agreed at the 2021 Interim Meeting to withdraw LMD-20.1. The Committee agreed on a Developing status for LMD-21.1

This item has been assigned to the following persons for further development. For more information or to provide comment, please contact:

Mr. Brent Price
Gilbarco Inc.
336-547-5009, brent.price@gilbarco.com

Mr. Randy Moses
Wayne Fueling Systems, LLC
215-257-2759

NCWM 2022 Interim Meeting: During the committee work session, the committee determined to recommend a voting status for this item based on the supporting comments made in open hearings.

Regional Associations' Comments:

WWMA 2021 Annual Meeting: Brent Price (Gilbarco): submitter: to modify event logger for cat. 3 devices - will allow electronic copy be available to W/M and not just hard copy. Worked with Wayne to develop this, conferenced with NIST and they are supportive. EV systems allows for this. We ask to allow LMD allow this (like EV). Has support of industry. Wants to consider this for voting status.

The WWMA S&T Committee recommends this item be assigned a Voting status.

SWMA 2021 Annual Meeting: Brent Price, Gilbarco, who is the submitter of this item, stated that the EVF code was recently changed to allow electronic copies of the event logger, and that he supports moving this forward as a Voting Item. Tim Chesser, Arkansas, supports moving this forward as a Voting Item.

This committee recommends moving this item forward as a Voting Item.

CWMA 2021 Interim Meeting: The committee heard comments from the floor. Diane Lee-NIST this item is ready to move forward as a voting or remain developing item. Charles Stutesman-Kansas item is read for vote.

CWMA S&T Committee recommends that the item move forward as voting.

NEWMA 2021 Interim Meeting: Jim Willis (New York) and John McGuire (New Jersey) commented to recommend voting status.

The NEWMA Specifications and Tolerances Committee recommends that this item be given Voting Status.

NEWMA Report: LMD-21.1	
Regional recommendation to NCWM on item status:	
<input checked="" type="checkbox"/> Recommend as a Voting Item on the NCWM agenda <input type="checkbox"/> Recommend as an Information Item on the NCWM agenda <input type="checkbox"/> Recommend as an Assigned Item on the NCWM agenda <i>(To be developed by an NCWM Task Group or Subcommittee)</i> <input type="checkbox"/> Recommend as a Developing Item on the NCWM agenda <i>(To be developed by source of the proposal)</i> <input type="checkbox"/> Recommend Withdrawal of the Item from the NCWM agenda <i>(In the case of new proposals, do not forward this item to NCWM)</i> <input type="checkbox"/> No recommendation from the region to NCWM <i>(If this is a new proposal, it will not be forwarded to the national committee by this region)</i>	
Comments and justification for the regional recommendation to NCWM: (This will appear in NCWM reports)	
Mr. Brent Price (Gilbarco) and Mr. Jim Willis (NY) commented that they support an electronic format of event loggers.	
After hearing comments from the floor, the committee considered the item to be fully developed and recommended that the item retains voting status.	

Additional letters, presentation and data may have been submitted for consideration with this item. Please refer to <https://www.ncwm.com/publication-16> to review these documents.

LMD-22.1 V Table T.2. Accuracy Classes and Tolerances for Liquid Measuring Devices Covered in NIST Handbook 44, Section 3.30

Source:

1 NTEP Measuring Sector

2 **Purpose:**

3 To correct an inconsistency between the application of tolerances to smaller capacity Diesel Exhaust Fluid (DEF)
 4 measuring systems and retail motor-fuel dispensers.

5 **Item Under Consideration:**

6 Amend Handbook 44, Liquid-Measuring Devices Code as follows:

Table T.2. Accuracy Classes and Tolerances for Liquid Measuring Devices Covered in NIST Handbook 44, Section 3.30.				
Accuracy Class	Application	Acceptance Tolerance	Maintenance Tolerance	Special Test Tolerance¹
0.3	- Petroleum products delivered from large capacity (flow rates greater than 115 L/min or 30 gpm)** devices, including motor-fuel devices - Heated products (other than asphalt) at temperatures greater than 50 °C (122 °F) - Asphalt at temperatures equal to or below 50 °C (122 °F) - All other liquids not shown in the table where the typical delivery is over 200 L (50 gal)	0.2 %	0.3 %	0.5 %
0.3A	- Asphalt at temperatures greater than 50 °C (122 °F)	0.3 %	0.3 %	0.5 %
0.5*	- Petroleum products delivered from small capacity (at 4 L/min (1 gpm) through 115 L/min or 30 gpm)** motor-fuel devices - Agri-chemical liquids - All other applications not shown in the table where the typical delivery is ≤ 200 L (50 gal)	0.3 %	0.5 %	0.5 %
1.1	- Petroleum products and other normal liquids from devices with flow rates** less than 1 gpm. - Devices designed to deliver less than 1 gal	0.75 %	1.0 %	1.25 %
<p>* For test drafts ≤ 40 L or 10 gal, the tolerances specified for Accuracy Class 0.5 in the table above do not apply. For these test drafts, the following applies:</p> <p>(a) Maintenance tolerances on normal and special tests shall be 20 mL plus 4 mL per indicated liter or 1 in³ plus 1 in³ per indicated gallon.</p> <p>(b) Acceptance tolerances on normal and special tests shall be one-half the maintenance tolerance values.</p> <p>¹ Special test tolerances are not applicable to retail motor fuel and retail DEF dispensers.</p> <p>** Flow rate refers to designed or marked maximum flow rate.</p>				

(Added 2002) (Amended 2006 and 2013)

Previous Action:

New

Original Justification:

During the review of NTEP requirements related to DEF dispensing systems, the NTEP Measuring Sector observed an inconsistency between the application of tolerances for retail motor-fuel dispensers (RMFDs) and for small capacity DEF measuring systems.

Smaller capacity DEF measuring systems use measuring equipment nearly identical to that used for RMFD applications and the NCWM and NTEP have agreed in past discussions that these two applications should be addressed consistently. Changes were made to NIST Handbook 44 in 2019 to more closely align requirements for RMFDs and smaller capacity DEF measuring systems; for example, paragraph N.4.2.2. Retail Motor-Fuel Devices and DEF, which specifies identical special test procedures for both systems. However, Table T.2. Accuracy Classes and Tolerances for Liquid-Measuring Devices Covered in NIST Handbook 44, includes an inconsistency in the application of tolerances for the “special test” for these two applications

It was judged during the Measuring Sector’s review that, based upon the application flow rates, without the note a DEF dispenser would be given a different tolerance for special tests than would RMFDs.

The proposed change to Footnote 1 will correct the oversight made when DEF dispensers were added to requirements in alignment with retail motor-fuel devices.

The submitter requested that this be a Voting item in 2022.

Comments in Favor:

Regulatory:

- Charlie Stutesman (Kansas) spoke wanting to make sure we were talking about DEF dispensers used at a retail establishment.
- Doug Musick (Kansas) suggested adding the word “Retail” in front of DEF.
- Cadence Matijevich (Nevada) Stated support as voting item with the addition of the word retail.
- Matt Douglas (California) and Tim Chesser (Arkansas) added their support of a voting item with the addition of the word “retail”.

Industry:

- Michael Keilty (Endress + Hauser) felt there was some inconsistency where Table T.2. Special tolerances are not applicable to RMFD and do not include DEF Dispensers. NTEP does not test with special test and supports item as voting.
- Brent Price (Gilbarco) Stated support of item as voting, including that DEF dispensers were manufactured to meet the RMFD standards.

Advisory:

-

Comments Against:

Regulatory:

-

Industry:

-

Advisory:

•

Neutral Comments:

Regulatory:

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Industry:

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Advisory:

•

Item Development:

The committee recommends the item under consideration be given a voting status with the addition of the word “retail” in front of DEF to add clarity to the code.

Regional Associations’ Comments:

This item was submitted by the NTEP Measuring Sector prior to the November 1 deadline, but not in time for regional consideration.

NEWMA Report: LMD-22.1

Regional recommendation to NCWM on item status:

- ☒ Recommend as a Voting Item on the NCWM agenda
- ☐ Recommend as an Information Item on the NCWM agenda
- ☐ Recommend as an Assigned Item on the NCWM agenda
(To be developed by an NCWM Task Group or Subcommittee)
- ☐ Recommend as a Developing Item on the NCWM agenda
(To be developed by source of the proposal)
- ☐ Recommend Withdrawal of the Item from the NCWM agenda
(In the case of new proposals, do not forward this item to NCWM)
- ☐ No recommendation from the region to NCWM
(If this is a new proposal, it will not be forwarded to the national committee by this region)

Comments and justification for the regional recommendation to NCWM: (This will appear in NCWM reports)

Mr. Brent Price (Gilbarco) commented that he supports the item as it adds clarity for tolerances for DEF. Ms. Tina Butcher (NIST OWM) commented that this item originated in the Measuring Sector and identified this as a house keeping item as DEF dispensers are often designed and treated as RMFDs. Therefore, the tolerance table for RMFD on special test tolerances will be updated to include DEF.

After hearing comments from the floor, the committee considered the item to be fully developed and recommended that the item retains voting status.

Additional letters, presentation and data may have been submitted for consideration with this item. Please refer to <https://www.ncwm.com/publication-16> to review these documents.

VTM – VEHICLE TANK METERS

VTM-18.1 V S.3.1 Diversion of Measured Liquid and S.3.1.1. Means for Clearing the Discharge Hose and UR.2.6. Clearing the Discharge on a multiple-product, single discharge hose.

NOTE: At the 2020 Interim Meeting the Committee agreed to combine both VTM-18.1 and VTM-20.1. Both items are now one item under VTM-18.1

Source:

New York and NIST OWM (Carryover from 2018, VTM 1-B) and Murray Equipment, Inc., Total Control Systems

Purpose:

Provide specifications and user requirements for manifold flush systems on a multiple-product, single-discharge hose. Recognize that there is a balance between a mechanism that provides an important safety benefit but also, if used incorrectly, facilitates fraud. Ensure that VTM owners understand their responsibilities when installing such a system and ensure uniformity in enforcement throughout the country and clarify the paragraph to protect vehicle motor fuel quality, retain safe operating procedures when handling vehicle motor fuels, and to prevent fraud during delivery of vehicle motor fuels from vehicle tank meters.

Item Under Consideration:

Amend Handbook 44, Vehicle-Tank Meters Code as follows:

Amend Handbook 44, Vehicle-Tank Meters Code as follows:

S.3.1. Diversion of Measured Liquid. – No means shall be provided by which any measured liquid can be diverted from the measuring chamber of the meter or the discharge line thereof. However, two or more delivery outlets may be installed if means are provided to ensure that:

(a) liquid can flow from only one such outlet at one time; and

(b) the direction of flow for which the mechanism may be set at any time is definitely and conspicuously indicated.

This paragraph does not apply to the following:

(1) Equipment used exclusively for fueling aircraft.

(2) Multiple-product, single-discharge hose metering systems that are equipped with systems designed to flush the discharge hose, provided the flushing system complies with the provisions of paragraph S.3.1.1. Means for Clearing the Discharge Hose, **Multiple-Product, Single-Discharge Hose Metering Systems.**

(Amended 2018 **and 20XX**)

S.3.1.1. Means for Clearing the Discharge Hose, Multiple-Product, Single-Discharge Hose Metering Systems. - **Multiple-product, single-discharge hose** Metering systems may be equipped with systems specifically designed to facilitate clearing of the discharge hose prior to delivery to avoid product contamination. In such systems, a valve to temporarily divert product from the measuring chamber of the meter to a storage tank, shall be installed only if all the following are met:

(a) the discharge hose remains of the wet-hose type;

(b) the valve and associated piping are approved by the weights and measures authority having jurisdiction over the device prior to commercial use;

(c) the valve is permanently marked with its purpose (e.g. flush valve);

(d) the valve is installed in a conspicuous manner and as far from the hose reel as practical;

(e) the system clearly and automatically indicates the direction of product flow during operation of the flush system; and

(f) clear means, such as an indicator light or audible alarm, is used to identify when the valve is in *use on both quantity indications and any associated recorded representations (e.g., using such terms as “flushing mode” or “not for commercial use”);*
[nonretroactive as of January 1, 2024.]

(g) *effective, automatic means shall be provided to prevent passage of liquid through any such flush system during normal operation of the measuring system; and*
[nonretroactive as of January 1, 2024.]

(h) no hoses or piping are connected to the inlet when it is not in use.
 (Added 2018)(**Amended 20XX**)

UR.2.6. Clearing the Discharge Hose.

UR.2.6.1. Clearing the Discharge Hose, General. – A manifold flush or similar system designed to accommodate the flushing of product on single-hose, multiple-product systems is not to be used during a commercial transaction. The following restrictions apply:

- a) The inlet valves for the system are not to be connected to any hose or piping (dust covers are permitted) when not in use.
- b) When the flushing system is in operation, the discharge hose is only to be connected to the port for the product type being flushed from the discharge line.
- c) Following the flushing process, indications and recording elements must be reset to zero prior to beginning a commercial delivery.
(Added 20XX)

UR.2.6.2. Minimizing Cross Contamination. – When dissimilar products are dispensed through a single meter, the user shall take steps to ensure the system is properly flushed to minimize the potential for cross contamination of product in receiving tanks on subsequent deliveries. Dispensing products having radically different characteristics (e.g., gasoline and diesel fuel) through a single meter delivery system is not recommended.
(Added 20XX)

UR.2.6.3. Records. Whenever, prior to delivery, a different product is pumped through the discharge hose to avoid contamination, a record including the date, time, original product, new product, and gallons pumped shall be maintained. These records shall be kept for a period of 12 months and available for inspection by the weights and measures authority.
 (Added 2018)

Background/Discussion:

This item has been assigned to the submitter for further development. For more information or to provide comment, please contact:

Mr. Jim Willis
 New York Department of Agriculture and Markets
 518-485-8377, james.willis@agriculture.ny.gov

This item was one of two separate parts of VTM-1 (previously VTM-1A and VTM-1B) considered by the Committee at the 2018 NCWM Annual Meeting. The item voted on at the 2018 Annual Meeting, VTM-1A was adopted and VTM-1B was assigned an Informational status and carried-over to the next cycle.

Manifold flush systems are typically used on VTM's with multiple compartments, delivering multiple products through a single hose. The purpose of the system is to allow the driver a means of clearing the hose of product prior to delivery (e.g., clearing the hose of diesel fuel before delivering clear kerosene). These types of systems are often marketed as a safety feature in that it eliminates the need for the driver to climb on top of the truck to clear the hose. Such systems are also useful in helping avoid cross-contamination. Typically, the driver attaches the nozzle to the manifold and pumps product back into the supply tank via the manifold until the previous product is flushed from the hose. There is often a sight gauge which allows the driver to tell when the product is flushed.

The obvious concern is that this makes it very easy for the driver to circulate product through the meter prior to delivery, which goes against S.3.1. It should be noted that it also goes against S.3.1. when the driver climbs on top of the tanker and clears the hose. The submitter has voiced concerns involving the safety of this practice noting that the operator could be subject to falls from the tanker. The distance between the flush system and the hose reel is also a factor in how easy it is for the driver to facilitate fraud.

Manifold flush systems are available from OEMs and can be found in various catalogs. Looking on multiple websites, these systems are being installed across the country and for some manufacturers seem to be standard equipment for new trucks. The submitter of VTM-1 has also seen these systems installed on trucks that are for sale where the seller notes the system as a selling point. He can foresee these systems being mandated in the future as a safety requirement and would like W&Ms to have a clear policy before that happens.

Another concern is with systems fabricated onsite. These systems are often difficult to distinguish and installed in an inconspicuous manner. While the submitter of VTM-1 has ordered many of these systems out-of-service until repaired, it can be frustrating for the owner because the truck was used in another state for years and approved by weights and measures jurisdiction in the other state. This lack of uniformity is problematic for both officials and private industry.

NCWM 2018 Annual Meeting: The Committee heard comments from OWM that this item needed additional work to address concerns that had been identified in OWM's 2018 Interim Meeting (and earlier) analyses. While there are clear benefits to improving safety when flushing hoses, OWM and others have noted these systems can facilitate fraud without appropriate safeguards in place. OWM noted the language in the Item Under Consideration in the Committee's 2018 Interim Report would:

1. provide an (unintentional) exemption to the provisions for "diversion of product" for *all* single meter, multiple product, multiple compartment systems;
2. would (unintentionally) require all such systems to be equipped with a manifold flush system;
3. fail to include requirements for the system to clearly indicate (on both display and recorded representations) when the flush system is in operation; and
4. fail to include limitations on how the user is permitted to appropriately use these systems.

In discussing the changes OWM felt were needed prior to the Annual Meeting, the submitter and OWM agreed that some of OWM's proposed changes would be considered editorial and others technical in nature. Since other than editorial changes could affect the Voting status of the item, OWM offered the following two courses of action for the Committee to consider:

1. Downgrade the item to Informational to allow time to address all the changes that are needed; or
2. Split the item into two parts to allow the portion of the item needing only editorial changes to move forward for vote; and carryover the remaining portion to allow time for it to be further developed and considered during the next NCWM cycle.

Rather than hold up the entire item to be considered in the next Conference cycle, the submitter requested the item be split into two parts to allow the completed portion, including the editorial changes, to move forward for vote.

NCWM 2019 Interim Meeting: The Committee heard comments to Agenda Item VTM-1 as well as position statements from MMA that they objected to manifold flush systems. NIST OWM provided an analysis to the Committee prior to the Interim Meeting. The comments heard during the open hearing and/or received prior to the Interim meeting are summarized below:

Mr. Hal Prince (FL) stated that it was missing any inclusion for limitation of use, such as when delivering multiple products. Mr. Prince suggested that the Committee consider language forwarded by the SWMA in its 2018 Annual Report. Mr. Prince also suggested that the item be kept developmental. Mr. Dan Murray (Murray Equipment, Total Controls System) stated that Manifold Flush Systems were a big problem in Europe where they are permitted. Mr. Murray suggested these systems could facilitate fraud and NTEP should carefully consider this before granting approval. These systems should also be sealed. Mr. Murray's opinion was that the item should be withdrawn. Mr. Dmitri Karimov speaking on behalf of Meter Manufacturers Association, stated that MMA objected to manifold flush systems.

NIST OWM agreed with the WWMA and the CWMA that this item is fully developed and agreed with assigning it a voting status. OWM provided the following review of the operation of the equipment, proposed changes, and additional points to consider:

- At the 2018 NCWM Annual Meeting the Conference voted to allow an exemption to S.3.1. for Manifold Flush Systems, which is currently in the 2019 HB 44 VTM code.
- S.3.1. states "no means" shall be provided to divert liquid from the measuring chamber of the meter or the discharge line.
- A manifold flush system allows liquid to be diverted from the discharge line on single hose multi-compartment VTMs so that liquid of one product is not mixed with liquid of another in the discharge line.
- Without a manifold flush system, the operator must manually return the product to the correct compartment to clear the discharge line before using another product.
- There are safety hazards with manually returning the product to storage (operator climbing on top of tank and lifting hose to return the product. There are also safety concerns when not properly clearing the discharge lines prior to delivering a different product and because of these safety concerns it was reported that more of these systems will likely be installed on single hose multicompartment trucks.
- Although safety is a high priority, the "means" used to return product back to storage is not as visible and makes facilitation of fraud a high possibility.
- The additional changes proposed are intended to ensure such systems are designed such that they do not facilitate fraud; help ensure owners understand their responsibilities when installing such a system; and ensure uniformity in enforcement though out the country.
- The changes reflect the suggested language from OWM's previous analysis and incorporate comments received from the MMA and others during the 2018 Annual meeting.

Non-retroactive dates may need to be added to allow time for manufacturers of flush systems to incorporate the safeguards into their systems. During the committee's work session, the Committee considered the comments received during the Interim Meeting open hearings and recommended a voting status for this item.

NCWM 2019 Annual Meeting: The Committee supported amendments proposed to subparts (f) and (g) based upon statements from the submitter (NY) indicating that manufacturers of manifold flush systems will need additional time to incorporate the safeguards into their systems. The Committee also agreed to place the item on the voting consent calendar as amended, and as shown in the Item Under Consideration.

During the open hearing sessions, the Committee heard comments from NIST OWM's Mrs. Tina Butcher offering a revision of S.3.1.1.(f). suggesting this portion be split into separate bullet points. Also heard were comments from Mr. Jim Willis (NY) in support of NIST OWM's suggestion and his recommendation for making this a nonretroactive requirement to allow manufacturers time to accommodate the necessary changes.

During the voting session, it was requested this item be removed from the voting consent calendar and voted on separately. The item failed to receive enough votes for adoption and was therefore returned to the Committee.

NCWM 2020 Interim Meeting: The Committee heard from Ms. Butcher (NIST OWM) who recommended that VTM-18.1 and VTM-20.1 be combined because both items address manifold flush systems, but VTM 18-1 does not restrict the use of the system to certain products and VTM 20-1 restricts the use of the system to home heating fuel. Mrs. Butcher recommended that the combined item be given a developing status to address the design and use of these systems adequately. Mrs. Butcher also recommended improvements to VTM 18-1 and VTM 20-1.

Mr. Dmitri Karimov (MMA) agreed with the language proposed in VTM 18-1 and acknowledged that there is value in the alternative proposal VTM-20.1 and supports combining both proposals into one. Mr. Hal Prince (FL) also agreed that Item VTM-18.1 and VTM-20.1 be combined and given a developing status. Mr. Prince expressed a willingness to work with submitters to further develop the items and noted that he has concerns with cross-contamination caused by these systems. Mr. Jim Willis agreed with Mrs. Butcher's statements. Mr. Karimov recommended including more categories for types of fuels in the proposal is important such as flammable, explosive, etc. Mr. John Hathaway (Murray Equipment) submitter of VTM-20.1 expressed interest in working together with the submitters of VTM-18.1.

During the Committee's work session, the committee agreed that this item, VTM-18.1 should be combined with VTM-20.1 and be given a developing status to allow the submitters of both items to work together towards resolving the conflicts in these two items.

NCWM 2020 Annual Meeting: Due to the 2020 Covid-19 pandemic, this meeting was adjourned to January 2021, at which time it was held as a virtual meeting. Due to constraint of time, only those items designated as 2020 Voting Items were addressed. All other items were addressed in the subsequent 2021 NCWM Interim Meeting.

NCWM 2021 Interim Meeting: The Committee heard from Mr. Mike Smith (NY) who supports VTM 18.1 as a Developing item and he agreed to work with the other submitters of this item on paragraphs S.3.1.1. (f) and (g) and to address contamination. Mr. Hal Prince (FL) supports a Developing status for VTM-18.1 and noted that with VTM-18.1 there will be issues with fuel contamination. The concern raised in previous discussions was that if these manifold systems are used with multi-product, single discharge hose dispensers for the delivery of both motor fuels and home heating fuels, a small amount of home heating fuel mixed with a motor fuel could be problematic. It was also noted that these fuels could get contaminated repeatedly whenever there is a change from one fuel to another and that there is also the safety issue of flashing when mixing a gasoline with diesel or kerosene. Ms. Diane Lee report that VTM-18.1 and VTM-20.1 conflict. VTM-20.1 restricts the use of these systems to be used with only home heating fuels. Dmitri Karimov (MMA) noted if VTM-18.1 is adopted then VTM-20.1 would not be required. Mr. Charles Stutesman, (KS) was not sure if VTM-18-1 and VTM-20-1 were being discussed together and it was pointed out that it was agreed that they be combined at the 2020 interim meeting. Mr. John Hathaway (Total Control Systems) agreed with a Developing status for this item and noted that the changes to Paragraphs (f) and (g) would help to address some of the issues that were raised. The committee agreed to a Developing status for VTM-18.1 and to Withdraw VTM-20.1. The committee also stated that any concerns with contamination and safety should also be addressed.

NCWM 2021 Annual Meeting: Mr. Jim Willis (NY, submitter) reported that there are no updates due to the pandemic and requested that it remain under Developing status. NIST OWM included written comments in its analysis.

NCWM 2022 Interim Meeting:

Item under consideration presented to 2022 NCWM Interim meeting as:

S.3.1. Diversion of Measured Liquid. – No means shall be provided by which any measured liquid can be diverted from the measuring chamber of the meter or the discharge line thereof. However, two or more delivery outlets may be installed if means are provided to ensure that:

- (b) liquid can flow from only one such outlet at one time; and
- (b) the direction of flow for which the mechanism may be set at any time is definitely and conspicuously indicated.

This paragraph does not apply to the following:

- (2) Equipment used exclusively for fueling aircraft.
- (2) Multiple-product, single-discharge hose metering systems that are equipped with systems designed to flush the discharge hose, provided the flushing system complies with the provisions of paragraph S.3.1.1. Means for Clearing the Discharge Hose, **Multiple-Product, Single-Discharge Hose Metering Systems.**
(Amended 2018 **and 20XX**)

S.3.1.1. Means for Clearing the Discharge Hose, Multiple-Product, Single-Discharge Hose Metering Systems. - **Multiple-product, single-discharge hose M**metering systems may be equipped with systems specifically designed to facilitate clearing of the discharge hose prior to delivery to avoid product contamination. In such systems, a valve to temporarily divert product from the measuring chamber of the meter to a storage tank, shall be installed only if all the following are met:

- (i) the discharge hose remains of the wet-hose type;
- (j) the valve and associated piping are approved by the weights and measures authority having jurisdiction over the device prior to commercial use;
- (k) the valve is permanently marked with its purpose (e.g. flush valve);
- (l) the valve is installed in a conspicuous manner and as far from the hose reel as practical;
- (m) the system clearly and automatically indicates the direction of product flow during operation of the flush system; and
- (n) *clear means, such as an indicator light or audible alarm, is used to identify when the valve is in use on both quantity indications and any associated recorded representations (e.g., using such terms as “flushing mode” or “not for commercial use”);*
[nonretroactive as of January 1, 2024.]
- (o) *effective, automatic means shall be provided to prevent passage of liquid through any such flush system during normal operation of the measuring system; and*
[nonretroactive as of January 1, 2024.]
- (p) no hoses or piping are connected to the inlet when it is not in use.

(Added 2018)(**Amended 20XX**)

UR.2.6. Clearing the Discharge Hose.

UR.2.6.1. Clearing the Discharge Hose, General. – **A manifold flush or similar system designed to accommodate the flushing of product on single-hose, multiple-product systems is not to be used during a commercial transaction. The following restrictions apply:**

- 1 d) The inlet valves for the system are not to be connected to any hose or piping (dust covers are
2 permitted) when not in use.
- 3 e) When the flushing system is in operation, the discharge hose is only to be connected to the port
4 for the product type being flushed from the discharge line.
- 5 f) Following the flushing process, indications and recording elements must be reset to zero prior
6 to beginning a commercial delivery.
7 (Added 20XX)

8 **UR.2.6.2. Records.** Whenever, prior to delivery, a different product is pumped through the discharge hose
9 to avoid contamination, a record including the date, time, original product, new product, and gallons pumped
10 shall be maintained. These records shall be kept for a period of 12 months and available for inspection by the
11 weights and measures authority.
12 (Added 2018)

13 The Committee heard from Mr. Jim Willis (NY, submitter) and provided an update that contained amended language
14 with modifications to UR.2.6.2 and creating UR.2.6.3. The amendments were agreed upon by the other joint
15 submitters, NIST OWM and Murray Equipment. He stated that the new proposed language would hold device owners
16 responsible for ensuring there is no cross-contamination of fuels and also allows jurisdictions to prohibit using
17 manifold flush systems or dispensing dissimilar products through a single meter. The Meter Manufacturers
18 Association, Mr. John Hathaway (Murray Equipment), Ms. Cheryl Ayer (NH), and Mr. John McGuire (NJ) also voiced
19 support for the amended language and urged the item be given a voting status. Mr. Hal Prince (FL) opposes the entire
20 item, indicating the use of a single meter to dispense different products is not legal in his state and has concerns of
21 cross-contamination of fuel. During the Committee work session, the committee assigned this item a voting status
22 with the amended language seen above as the item under consideration. The item as presented to the 2022 NCWM
23 interim meeting can be seen below the item under consideration.

24 **Regional Associations' Comments:**

25 WWMA 2021 Annual Meeting: Matt Douglas (California - DMS): California supports further development. Has
26 there been any further development since annual meeting?

27 The WWMA S&T Committee recommends the status remain Developmental. The Committee recommends that the
28 submitters (NIST, New York and Murray Equipment) continue their work together to further develop the item.

29 SWMA 2021 Annual Meeting: No comments were received on this item. NIST requests this item remain
30 Developmental.

31 This committee recommends the status remain Developing at the request of the submitter.

32 CWMA 2021 Interim Meeting: The committee heard comments from the floor. Diane Lee-NIST comments about
33 this item are in NCWM Annual report. Charles Stutesman-Kansas was the intent of this item for vehicle motor fuel or
34 for all items such as home heating oil.

35 CWMA S&T Committee recommends item as a developing item.

37 NEWMA 2021 Interim Meeting: Comments were heard from Jim Willis (New York) as submitter of this item. He
38 stated that communication was in process with Murray Controls in regards to changes to this proposal. The flushing
39 “systems” have been around for decades and not just as OEM systems. The driver would climb on top the truck to
40 flush a line. Now they can flush the hose without the danger of falling off the truck. Some suggestions have been made
41 to limit the products carried on the truck to similar products. NYS does not support such language as the flush system
42 actually allows for the safe clearing of the hose and minimizes contamination. A flush manifold enables a truck to
43 carry different products at the same time. Jim Willis (New York) recommends further development. Lou Sakin

(Hopkinton/Northbridge, MA) asked when development may be finished. Jim Willis responded that hopefully by the NCWM Interim meeting. John McGuire (New Jersey) supported developing status.

The NEWMA Specifications and Tolerances Committee recommends that this item remain in Developing Status and encourages New York, NIST and Murray Controls to continue working towards full development.

NEWMA Report: VTM-18.1

Regional recommendation to NCWM on item status:

- ☒ Recommend as a Voting Item on the NCWM agenda
- ☐ Recommend as an Information Item on the NCWM agenda
- ☐ Recommend as an Assigned Item on the NCWM agenda
(To be developed by an NCWM Task Group or Subcommittee)
- ☐ Recommend as a Developing Item on the NCWM agenda
(To be developed by source of the proposal)
- ☐ Recommend Withdrawal of the Item from the NCWM agenda
(In the case of new proposals, do not forward this item to NCWM)
- ☐ No recommendation from the region to NCWM
(If this is a new proposal, it will not be forwarded to the national committee by this region)

Comments and justification for the regional recommendation to NCWM: *(This will appear in NCWM reports)*

Mr. Jim Willis (NY), Mr. John McGuire (NJ), Mr. Ethan Bogren (Westchester County, NY) and Ms. Tina Butcher (NIST OWM) rose in support of the item as voting.

After hearing comments from the floor, the committee considered the item to be fully developed and recommended that the item retains voting status.

Additional letters, presentation and data may have been submitted for consideration with this item. Please refer to <https://www.ncwm.com/publication-16> to review these documents.

VTM-20.2 A Table T.2. Tolerances for Vehicle Mounted Milk Meters.

NOTE: This item was revised based on changes that were made by the Committee at the 2021 Interim Meeting. The item under consideration was removed from the voting consent calendar at the 2021 Annual Meeting and the S&T Committee made this a developing item)

Source:

POUL TARP A/S

Purpose:

Change tolerances to accommodate more efficient milk-metering systems.

Item Under Consideration:

Amend Handbook 44, Vehicle-Tank Meters Code as follows:

T.2. Tolerance Values. – Tolerances shall be as shown in Table 1. Accuracy Classes and Tolerances for Vehicle-Tank Meters Other Than Vehicle-Mounted Milk Meters and Table 2. Tolerances for Vehicle-Mounted Milk Meters. (Amended 1995, **20XX**)

Table 2.
Tolerances for Vehicle-Mounted Milk Meters

Indication (gallons)	Maintenance Tolerance (gallons)	Acceptance Tolerance (gallons)
100	0.5	0.3
200	0.7	0.4
300	0.9	0.5
400	1.1	0.6
500	1.3	0.7
Over 500	Add 0.002 gallon per indicated gallon over 500	Add 0.001 gallon per indicated gallon over 500

(Added 1989)

Table 2.
Tolerances for Vehicle-Mounted Milk Meters

	Acceptance Tolerance	Maintenance Tolerance
Complete Measuring System	0.5%	0.5%
Meter Only	0.3%	0.3%

(Amended 20XX)

Background/Discussion:

A Milk Meter Tolerance Task Group was formed and assigned to this item. Please contact the task group chair for more information:

Mr. Charlie Stutesman
Kansas Department of Agriculture
785-564-6681, charles.stutesman@ks.gov

Existing tolerances are based on the accuracy of the Flow meter itself. The proposed Tolerances are based on Milk Metering Systems where the magnetic flow meter is a part of the Milk Metering system handling milk containing air.

The accuracy of the Flow meter will always be influenced by the way it is used. The only way you can obtain the accuracy described by the manufacture is when the flow meter is operating as a “stand alone” unit and, equally important, only if the product passing through the flow meter is complete air-free.

The submitter provided the following:

During the past 20 years, the need for improved efficiency in the collection of milk has resulted in the use of milk pumping equipment being installed on milk tankers.

One of the most obvious places for a modern Dairy to optimize is the amount of time that the milk tanker uses to make a collection. If you can reduce the collection time at each farmer, the Dairy will be able to get a significant reduction in collection and transport cost for the benefit of the Farmer, Consumer and the Dairy itself. At the same time, you will get an environmental benefit as a result of reduced CO2 in the milk collection process.

The consequence of introducing pump systems on milk tankers is that it causes air to be mixed with the milk which again will influence the accuracy of the magnetic flow-meter mounted in the system. Milk entrains air unlike petroleum liquids which do not. As you know, the flow meter will count anything that passes through the meter – liquid as well as air – and it is therefore essential that as much air as possible is removed from the milk

1 before it reaches the flow-meter. However, it is widely recognized that it is not possible to remove all the air from
2 the milk, which will result in an inaccuracy.

3 It is therefore essential that the tolerances for vehicle mounted milk pump systems using magnetic flow-meters
4 for determining milk volume reflects today's way of collecting milk. This means that existing Tolerance for milk
5 meters cannot be used when the milk meter is a part of a system where different system parts will influence the
6 accuracy of the count. Such milk metering systems will need to be classified with their own tolerances.

7 Based on our 25 years of experience as a manufacturer of these systems and more than 3000 installations on milk
8 trucks operating in more than 15 countries, we would like to propose that the Tolerance for Vehicle Mounted
9 Milk Metering Systems is changed from 0.3% to 0.5% and that the tolerances will be listed and classified
10 separately and not be associated with products from the oil industry. Our proposal is consistent with Weights &
11 Measures tolerances accepted around the world.

12 We hope that the NCWM will consider our proposal and we will be more than happy to meet with you and answer
13 any questions you may have. We believe that a change of Tolerance is necessary in order for the Handbook 44 to
14 reflect today's milk collection and the technical progress within milk collection.

15 Yours sincerely

16 Poul Tarp

17 President POUL TARP A/S

19 The POUL TARP milk pump system holds an MID approval which is recognized and in accordance with guidelines
20 and standards described in the **OIML - INTERNATIONAL ORGANIZATION OF LEGAL METROLOGY**

1 FLOW COMPUTERS REGULATION IN THE US:

DANAK
PROD Reg.nr. 7025

FORCE
Certification

EC-Type Examination Certificate
Measuring Instrument Directive

Certificate number: **DK-0200-MI005-006**
Issued by FORCE Certification, Denmark
EC-notified body number 0200

In accordance with the Directive 2004/22/EC of the European Parliament and Council of March 31st, 2004 on measuring instruments (MID) with later amendments.

Issued to: Ingeniørfirmaet Poul Tarp A/S
Jomfruløkken 4
DK - 8930 Randers NØ
Denmark

Reference No.: 115-24938

Type of instrument: Milk Measuring System on road tankers (or stationary)

Type designation: PT LVMS - Poul Tarp Liquid Volume Measuring System

Type variants: type 2, type 3 and type 4

Valid until: August 10, 2025

Number of pages: 38 including appendix

Date of issue: August 10, 2015

Approved by: *[Signature]*
Lene Savstrup Kristensen
Certification Manager

Processed by: *[Signature]*
Lars Parnø
Examiner

The conformity markings may only be affixed to the above type approved equipment. The manufacturer's Declaration of Conformity may only be issued and the notified body identification number may only be affixed on the instrument when the production/product assessment module (D or F) of the Directive is fully complied with and controlled by a written inspection agreement with a notified body. This EC-type examination certificate may not be reproduced except in full, without written permission by FORCE Certification.

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FORCE
Certification

DK-0200-MI005-006

Appendix to
EC-Type Examination Certificate
Measuring Instrument Directive

Number: **DK-0200-MI005-006**
Issued by FORCE Certification, Denmark
EC-notified body number 0200

Revision	Issue date	Changes
DK-0200-MI005-006	09-01-2015	First issue
DK-0200-MI005-006	10-08-2015	Second issue

The measuring system has the following characteristics

Accuracy class	0.5
Mechanical class	M3
Electromagnetic class	E3
Climatic class	Condensing/open location, H3
Ambient temperature	-25 / +55 °C
Liquid temperature	0 / +50 °C
Liquid pressure max	1 bar
Liquid types	Milk (Raw milk)
Liquid density	1,035 Kg/L at 5 °C +/- 0,02 Kg/L
Liquid conductivity	≥ 5 µS/cm

Flow characteristics for Measuring System, including Minimum Measured Quantity (MMQ), depends on actual flow sensor Proces Data 340 series in combination with Gas Elimination Device (GED) used:

MS/Meter	GED	Qmax Type	Qmax [m³/h]	Qmax [L/m]	Qmin [m³/h]	Qmin [L/m]	MMQ [L]	Inlet [mm]
Type2+4/CS1	PTe355	22,2	600	4	67	300	51	
Type3/C63	PTe506	80	1334	5	84/(250)*	300/(100)*	63,5	
Type3/C76	PTe506	90	1500	12	200	300	75	
Type3/C102	PTe506	90	1500	18	300	300	102	

Note: The ratio between Qmax and Qmin of the measuring system, shall be at least 5 (5:1) within the flow rate range of the actual meter sensor in combination with relevant Gas elimination device.
*) MMQ 100 liter only after first delivery on full system.

Primary display on flow computer S12:

Indication:

Maximum capacity	99999 L	or	99999,9 L
Minimum increment of registration	1 L		0,1 L

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DK-0200-MI005-006

Applied documents

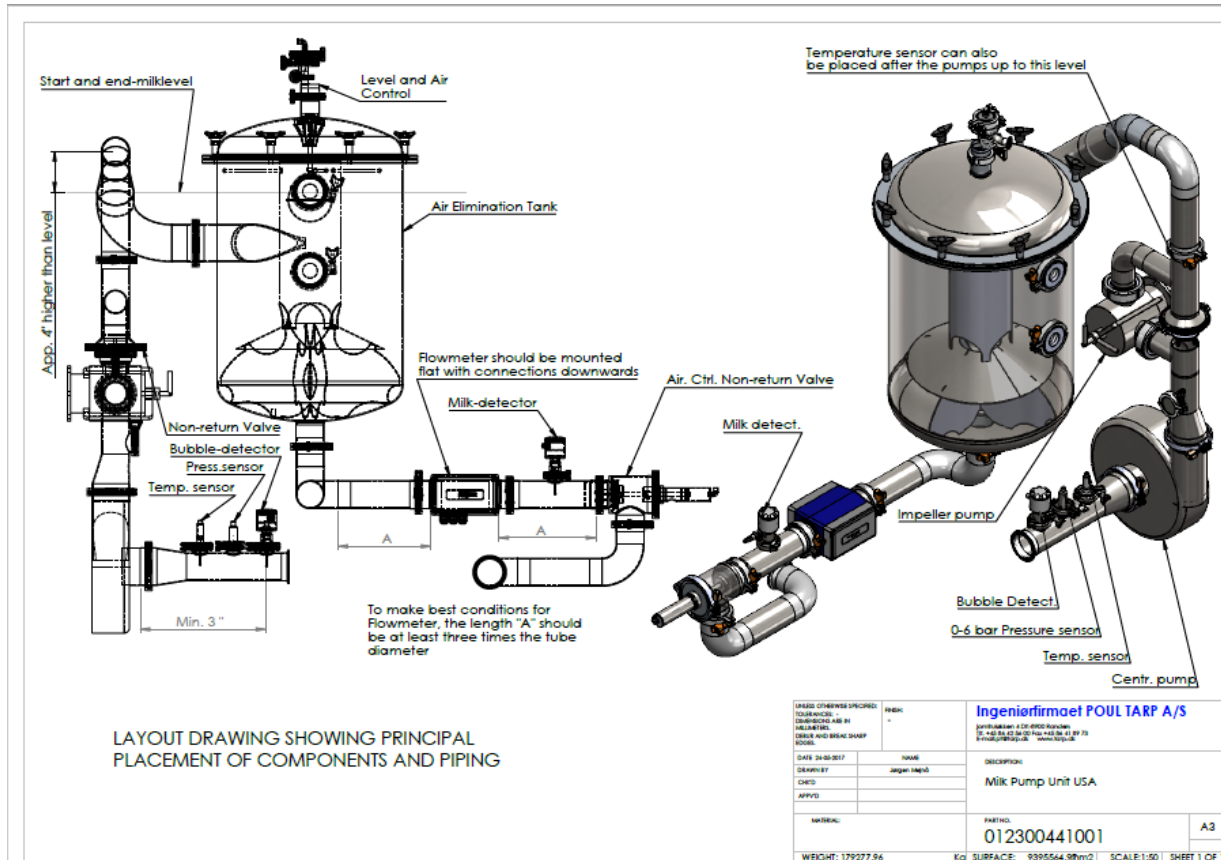
Recommendations	Guides
OIML R117 (1995)	WELMEC Guide 10.5 Marking of fuel dispensers (2006)
OIML R117-1 (2007)	WELMEC Guide 10.6 Sealing of fuel dispensers (2008)
OIML D11 (2004)	
OIML R117-2 Annex - E (CD2)	

Applied Evaluation Certificates belonging to this Type Examination Certificate:

- Evaluation Certificate Force Certification No. 115-24938.05, issued 10.08.2015
- Evaluation Certificate and Description NMI no. TC7204 rev 6, issued 26 august 2014
- Documentation folder NMI no. TC7204-4

Technical documentation
Reference no.: 114-30557.

The standards related to metrological aspects come from OIML R117-1 for liquids (Dynamic measuring systems for liquids other than water, part 1: Metrological and technical requirements) and documents D11 (General requirements for electronic measuring instruments) and D31 (General requirements for software-controlled measuring instruments) from OIML



NCWM 2020 Interim Meeting: Mr. Carey McMahon (Poul Tarp) provided a presentation on his company's VTM milk metering system advocating for expanding tolerances for these systems.

Ms. Leigh Hamilton (Piper) provided a presentation concerning the piper system and stated in her presentation that piper currently has an approved NTEP certificate for their device that is in service in the U.S. Ms. Leigh opposes this item to increase the tolerances for milk meters and noted in her presentation that there may not be a need to increase the tolerances in order to move forward in allowing innovation in milk measurements.

Mr. Charles Stutesman (KS) provided a presentation on research that KDA has done on the history of 3 HB 44 Codes (3.31. VTMs, 3.35. Milk Meters, and 4.42. Farm Milk Tanks) and the issue of Piper's NTEP Certificate. Mr. Stutesman discussed complications involved in measurement of product using various methods and potential shortcomings of Piper's NTEP Certificate.

Mr. Doug Musick (KS) stated that he does not believe there is enough information presented to change existing tolerances and noted that the Piper system was only evaluated for accuracy up to a measurement of 300 gallons. He also noted that he believes that Piper's certificate should be amended to qualify the system for draft sizes up to 300 gallons. Mr. Mike Keilty (Endress + Hauser) commented that he had concerns with Piper's certificate. Ms. Hamilton noted that Piper followed and followed guidelines as provided during the NTEP evaluation. Ms. Diane Lee (NIST OWM) stated that the committee may want to consider a developing status for this item and that more information is needed concerning air elimination methods for milk metering systems.

A representative from the Dairy Farmers of America, stated that they oppose the increase in tolerance but supports the use of VTM metering systems. Mr. Carey McMahon (Poul Tarp) pointed out that the Poul Tarp system can be accurate for any size measurement, but the beginning and end of the measurement would not be accurate measures (within tolerance) due to entrained air in the product when the flow is not uniform. Mr. Dmitri Karimov (MMA) stated that the proposal should be further developed and pointed out that due to the tolerance structure becoming more stringent as the volume of the measurement increases, the acceptance tolerance at 500 gallons is unreasonable. Mr. Hal Prince (Florida) stated that he does not agree with expanding the tolerances. Mr. Prince believes that air elimination should be the focus and that the proposal should be assigned to a task group. Mrs. Tina Butcher (NIST OWM) noted that testing should be performed using multiple quantities and flowrates. Mr. Charles Stutesman (KS) pointed out that confusion is generated by multiple HB 44 codes addressing the measurement of milk and that the proposal should be assigned to a TG to sort this out. Mr. Stutesman also pointed out there is no requirements in HB 44 for air elimination pertaining to milk metering in these codes. Mrs. Butcher noted that the current HB 44 requirements may not be flexible enough for this new technology and that the existing codes may need to be reviewed and updated.

Ms. Leigh Hamilton (Piper) stated that this is not simply a consideration of only a change in tolerances. There are other requirements (currently in the OIML standard) that should also be considered in making any changes to the existing HB 44 requirements. Mr. Mike Keilty (Endress+Hauser) stated that air elimination is a difficult problem to mitigate and noted that he is not sure if it is necessary to expand the existing tolerances or make other amendments. Mr. Carey McMahon (Poul Tarp) stated that using the existing HB 44 tolerances in the VTM Code, at a draft of 5000 gallons, the tolerance value is highly unreasonable (KS) noted that the type evaluation performed on the Piper system was limited to a draft of 300 gallons. If evaluation had included other draft sizes, the Piper system may have failed the testing.

Mr. Ken Ramsburg (MD) stated that the proposal should be given a developing status. Mr. Ramsburg agreed that there is no existing requirement for this type of system addressing air elimination and stated that the flow meter, air eliminator, plumbing, and pumps all need to be considered during evaluation and the evaluation should be conducted on the system.

Mr. Tim Chesser (AR) questioned whether the flow meter used in the system is appropriate and noted that there are many unanswered questions surrounding this issue. Mr. Jim Willis (NY) recommended a developing status for this item. Mr. Kevin Schnepf (CA) stated that although he is opposed to relaxing existing tolerances, he supports the development of this proposal by an assigned task group.

During the Committee's work session, the committee agreed that this item has merit and should be given an Assigned status. The charge to the assigned task group will be to address three HB 44 codes (VTM, Farm Milk Tanks and Milk meters) to review the requirements and tolerances found in these codes and assess the need for changes.

NCWM 2020 Annual Meeting: Due to the 2020 Covid-19 pandemic, this meeting was adjourned to January 2021, at which time it was held as a virtual meeting. Due to constraint of time, only those items designated as 2020 Voting Items were addressed. All other items were addressed in the subsequent 2021 NCWM Interim Meeting.

NCWM 2021 Interim Meeting: The Committee heard from Mr. Charles Stutesman (KS, Chair of the Milk Meter Task Group) who gave an update on the task group activities. Mr. Stutesman reported that the Milk Meter Task group worked via e-mail communication and reviewed and discussed the proposed Milk Meter Tolerances in Agenda item VTM-20.2. The Milk Meter Task Group also discussed the tolerances that are included in NIST HB 44 for Milk meters in various parts of HB 44 which include the VTM, Section 3.31, Farm Milk Tanks, Section 4.42., Mass Flow Meters, Section 3.37, and Milk Meters, Section 3.35. Mr. Stutesman also reported that the task group reviewed OIML tolerances for milk meters. Mr. Stutesman stated that after a review of the various tolerances, the task group agreed that the OIML tolerances provide tolerances that encompassed the system of measuring milk and not just a tolerance for the performance of the meter. The Milk Meter Task group agreed with proposing the use of the OIML milk meter tolerance as the milk meter tolerances in the VTM code. Mr. Stutesman provided a copy of the proposed changes to VTM-20.2. The proposed tolerances will align the tolerances in the VTM Code for Milk Meters with OIML Milk Meter Tolerances. Mr. Stutesman requested that this item move forward as a Voting item. The Committee also heard from Clark Cooney who noted that he supported the items as Developing because one company mentioned meeting the existing tolerances. It was mentioned that the company's testing was only performed over a limited range of volumes.

During the committees work session the committee agreed with the proposal from the milk meter task group to adopt OIML tolerances for milk meters in the VTM code, that this item be given a voting status, and that the item under consideration be replaced with the work groups proposal to adopt OIML tolerances. The committee also agreed with expanding the task group to address other milk meter codes in HB 44. The Item Under Consideration above are the tolerances agreed to by the milk meter task group and that align with OIML tolerances.

NCWM 2021 Annual Meeting: Mr. Charlie Stutesman provided an update on the milk meter task group activities. Mr. Stutesman noted that there was a field trip to observe milk metering systems. He noted that the proposed tolerances will align the milk tolerances with the OIML tolerances for milk meters and Mr. Stutesman noted that the OIML tolerances provides one tolerance for the meter and another tolerance for a milk metering system. He also noted that it may be impractical to perform an air eliminator test on these devices due to comingling of product.

During the committees work session, the Committee agreed to a Voting Status for this item and added it to its voting consent calendar.

During the voting session, Mr. Charlie Stutesman asked that consideration be given to adding a non-retroactive date to the proposed tolerances. It was questioned during the discussion that if a non-retroactive date was added to the tolerances, then, what tolerances would apply to existing meters that had been manufactured and tested prior to the non-retroactive date. One of the concerns expressed with having a new tolerance table without a nonretroactive date was whether or not existing devices would be required to be reevaluated in the NTEP. The conference voted against adding the nonretroactive requirement to the proposed tolerance table and the item under consideration to change the tolerances failed to receive the 27 votes from the House of State Representatives, so the item failed and went back to the S&T committee. The S&T Committee agreed to a Developing status for this item.

Note: For reference, the Item under Consideration that was included in the 2021 NCWM Interim Meeting Agenda is provided below:

Table 2. Tolerances for Vehicle-Mounted Milk Meters		
Indication (gallons)	Maintenance Tolerance (gallons)	Acceptance Tolerance (gallons)
100	0.5 <u>0.6</u>	0.3 <u>0.5</u>
200	0.7 <u>1.2</u>	0.4 <u>1.0</u>
300	0.9 <u>1.8</u>	0.5 <u>1.5</u>
400	1.1 <u>2.4</u>	0.6 <u>2.0</u>
500	1.3 <u>3.0</u>	0.7 <u>2.5</u>
Over 500	Add 0.002 <u>0.006</u> gallons per indicated gallon over 500	Add 0.001 <u>0.005</u> gallons per indicated gallon over 500

NCWM 2022 Interim Meeting: Mr. Charlie Stutesman (KS) spoke as chairperson of the Milk Meter Task Group. He requested that this item be assigned back to the task group for further development. Mr. Stutesman provided an update on the task group meeting in January 2022 in which they discussed tolerances in both 3.31 Vehicle Tank Meters and 3.35 Milk Meters and the need to have the tolerance be applied to both vehicle mounted and station meters as the manufacturers are developing meters that will be capable of being installed in either application. The tolerance tables can be found in the supporting documents. Mr. Stutesman also renewed the task groups request to expand its scope to include possibly creating a new code that contains requirements of both vehicle mounted and stationary milk meters and metering systems due to the unique properties of milk as a liquid. Speaking on behalf of himself, Mr. Stutesman (KS) stated that he has provided a document in the supporting documents that outlines the four active and five inactive NTEP certified meters and metering systems in terms of test draft size and applicable tolerances. He noted that the active four have a range of 0.12%-0.6%. He also noted that milk meters are the only liquid measuring device where the volume tolerance decreases as the draft size increases and suggests percentages more in line with OIML tolerance would be more appropriate. Mr. Ken Ramsburg (MD) suggested combining the two tolerances to be used for field

evaluations. Ms. Diane Lee (NIST OWM) commented that the task group should work toward making all test methods uniform. Mr. Doug Musick (KS) and Mr. Matt Douglas (CA) supported assigning this item to the task group for further development. During committee work sessions, the committee agreed to assign this item back to the milk meter task group so they may continue to ascertain data. In addition, the committee agreed to request that NCWM Chairman Ivan Hankins expand the scope of the task group to include all reference to milk meters, meter systems and related test methods, specifications and tolerance in an effort to harmonize the codes.

Regional Associations' Comments:

WWMA 2021 Annual Meeting: Diane Lee (NIST OWM): put forth by task group working on milk meters. They're still in process of reviewing. It was put forth to vote but last-minute change to make it non retroactive. This put it back to developing. What would happen to devices that are currently in the field? During annual meeting this was returned back to developing and NIST supports developing.

The WWMA S&T Committee recommends the status remain Developmental. During the WWMA S&T Work Session Diane Lee (NIST OWM) was asked for further clarification on her testimony. She provided the following clarification: "During the Annual Meeting a proposal was made to add a non-retroactive date. Because questions were raised as to how this would affect existing devices the item was moved from Voting to Developing." The Committee looks forward to hearing from the working group.

SWMA 2021 Annual Meeting: No comments were received on this item. This committee would like to see more evidence and reasoning on why these devices should not have to meet the existing tolerances, and why the tolerances listed are appropriate.

This committee recommends the item remain Developing so that the submitters can gather more evidence about the accuracy of these devices.

CWMA 2021 Interim Meeting: The committee heard comments from the floor. Charles Stutesman-Kansas would like to see item be returned to task group.

CWMA S&T Committee recommends that the item be assigned to Milk Meter Tolerance Task Group and be an assigned item.

NEWMA 2021 Interim Meeting: Jim Willis (New York) commented as a member of the task group about the field trip that was taken in Rochester NY just prior to the NCWM meeting in July to witness the truck mounted Milk Meters in action. The task group is asking for recommendations in-regards to a tolerance value that people would be comfortable with. Jim Willis commented that the tolerance of 0.5% is considered too large by some, but we have 0.4% in the handbook now in-regards to checking a milk tank with a meter. Jimmy Cassidy (MA) asked if any systems currently meet the requirements in the handbook and Jim Willis (New York) replied that currently there is one milk meter system on tank trucks that meets the requirements currently in the handbook.

The NEWMA Specifications and Tolerances Committee recommends that this item remain in Developing Status.

NEWMA Report: VTM-20.2	
Regional recommendation to NCWM on item status:	
<input type="checkbox"/>	Recommend as a Voting Item on the NCWM agenda
<input type="checkbox"/>	Recommend as an Information Item on the NCWM agenda
<input checked="" type="checkbox"/>	Recommend as an Assigned Item on the NCWM agenda <i>(To be developed by an NCWM Task Group or Subcommittee)</i>
<input type="checkbox"/>	Recommend as a Developing Item on the NCWM agenda <i>(To be developed by source of the proposal)</i>
<input type="checkbox"/>	Recommend Withdrawal of the Item from the NCWM agenda <i>(In the case of new proposals, do not forward this item to NCWM)</i>
<input type="checkbox"/>	No recommendation from the region to NCWM <i>(If this is a new proposal, it will not be forwarded to the national committee by this region)</i>

Comments and justification for the regional recommendation to NCWM: (This will appear in NCWM reports)

Mr. Jim Willis (NY) commented as a member of the Milk Meter Task Group. He indicated that the task group has made strides and hopes for ability to perform additional work on the item.

After hearing comments from the floor, the committee recognized the need for further development of the item and recommended that the item retain an assigned status. The committee recommends the NCWM Milk Meter Task Group continue to work with stakeholders to further develop this item.

Additional letters, presentation and data may have been submitted for consideration with this item. Please refer to <https://www.ncwm.com/publication-16> to review these documents.

LPG – LIQUIFIED PETROLEUM GAS AND ANHYDROUS AMMONIA LIQUID-MEASURING DEVICES

LPG-22.1 V A.1. General., and Appendix D – Definitions. Liquefied Petroleum Gas Retail Motor Fuel Device.

Source:

North Carolina Department of Agriculture and Consumer Services

Purpose:

Provide a clearer definition of retail motor fuel device, in relation to LP-Gas, is needed to allow for the continued use of much of the existing dispenser equipment in the field. Those that are for delivery into a vehicle should comply with the appropriate HB 44 requirements, while those that dispense into a portable container, even if later used as a “motor fuel”, can used a non-RMFD dispenser.

Item Under Consideration:

Amend Handbook 44, Liquefied Petroleum Gas and Anhydrous Ammonia Liquid-Measuring Devices Cod as follows:

A.1.General. – This code applies to devices used for the measurement of liquefied petroleum gas and anhydrous ammonia in the liquid state, whether such devices are installed in a permanent location or mounted on a vehicle.

For retail motor fuel devices, see Appendix D, definition of liquefied petroleum gas retail motor fuel device.

And amend Handbook 44, Appendix D – Definitions as follows:

Liquefied Petroleum Gas Retail Motor Fuel Device. – A device designed for the measurement and delivery of liquefied petroleum gas used as a fuel for internal combustion engines in licensed vehicles bearing a state or federal license plate for use on public roads. The term means the same as “retail motor fuel dispenser” and “retail motor fuel device” as it appears in section 3.32 LPG and Anhydrous Ammonia Liquid-Measuring Devices [3.32]

motor-fuel device or motor-fuel dispenser or retail motor-fuel device. – A device designed for the measurement and delivery of liquids used as fuel for internal-combustion engines. The term “motor-fuel dispenser” means the same as “motor-fuel device”; the term “retail motor-fuel device” applies to a unique category of device. (Also see **definition definitions of “retail device.” and “liquefied petroleum gas retail motor fuel dispenser”**) [3.30, ~~3.32~~, 3.37]

Previous Action:

New

Original Justification:

By definition in HB 44, LP-Gas (propane) is a motor fuel, however the majority of propane that is sold is not for motor fuel use. Most dispensers in the field are to fill bottles/cylinders/containers, and should be able to continue in that purpose, even if that container may end up fueling a motor, such as a forklift, mower or generator. I think the intent of a “retail motor fuel device” is that the majority of that product is going into vehicles. So, I have purposely chosen to use “licensed vehicles” to help define the appropriate device as “highway” and “non-highway” is a separate road tax issue. I think it is too much to ask locations, such as campground, with a dispenser to primarily fill grill cylinders, to add a retail motor fuel device because they occasionally fill a container that may be used on propane lawn mower, or similar equipment.

I suggest an addition to section A.1. to draw attention to this definition and the applicability of the code in that context. The alternative would be to change all instances of “retail motor fuel dispenser” and “retail motor fuel device” in section 3.32 to “liquefied petroleum gas retail motor fuel device”.

The problem encountered by our staff is that existing, container filling dispensers later had a “T” installed and another hose was added, which had a K15 nozzle on it, currently required by the *LP-Gas Code* for filling vehicles. At that time, it was determined the equipment was being used., in part, as a retail motor fuel device and the appropriate HB 44 sections applied, which they could not meet (they were installed after the 2017 requirements took effect). I will note the existence of the nozzle alone does not make it and RFMD, as containers can be retrofitted to accept that nozzle, but it is an indication that questions on equipment usage need to be asked.

There are currently several NTEP approved LPG retail motor fuel dispensers in the marketplace and are defined by those manufacturers as such. This would maintain the level playing field for both the manufacturers and the businesses that have already installed LP-Gas RMFDs for the purpose of fueling vehicles.

The submitter acknowledged that This will effectively define devices for use with “vehicles” and “equipment”. Some would suggest that current HB 44 requirements should apply to all dispensers that may result in usage as a “motor fuel”, but this is not practical in terms of cost of equipment given the fraction of that type sale many locations may have. This is not how we typically consider items, but as LP-Gas, a long existing product, and corresponding devices, is moving more into the alternative fuel market, there should be some consideration given to better determine where a RMFD is required. The alternative is to not enforce the requirements at all or selectively enforce them at some locations and not others, which is not equitable to the industry or the customers.

The submitter requested that this be a Voting Item in 2022.

Comments in Favor:

Regulatory:

- The submitter of this item explained the need to accurately define devices that meter liquid propane gas (LPG) as a motor fuel. There have been instances where a device that is primarily used for filling bottles or vessels has been retrofitted with a nozzle to also fill vehicles, essentially making it a retail motor fuel device. A few regulators commented that the term “license” may be confusing as some states require off-road vehicles to be licensed as well. Several regulators voiced support of this item.

Industry:

- A representative of an LPG trade organization voiced support for this proposal.

Advisory:

-

Comments Against:

Regulatory:

-

Industry:

-

Advisory:

-

Neutral Comments:**Regulatory:**

-

Industry:

-

Advisory:

-

Item Development:

NCWM 2022 Interim Meeting: During the committee work session, the committee discussed the term “licensed vehicles” and the use of alternate language. After deliberation, the committee settled on language they feel would be acceptable to the body (“vehicles bearing a state or federal license plate for use on public roads”). The updated language appears in the Item Under Consideration as a voting item.

Regional Associations’ Comments:

WWMA 2021 Annual Meeting: Diane Lee (NIST OWM): This is a newer item. They will be meeting to discuss ramifications. Bruce Swiecicki (National Propane Gas Association): 3 items addressing the same problems. He is in favor of this item. They submitted 22.3. All of the LPG proposals would be favorable. (he's submitted info and comments (LPG-22.3). Dwight Farr (U-Haul Program Manager) : helps clarify definitions. He has no problems with this.

The WWMA S&T Committee recommends that this item be assigned a Developing status. The Committee agrees that the proposal has merit. The item’s language needs to be adjusted to provide clarity so that the proposed definition applies only to Retail Motor Fuel – Liquefied Petroleum Gas devices; The use of the term “designed” is vague. The Committee recommends that additional study is needed to assess how the revised definition will affect the application of specific sections of the code.

SWMA 2021 Annual Meeting: Steven Benjamin, North Carolina, stated that he is seeing businesses add hoses to existing devices, essentially creating a RMFD. He recommended moving this forward as a Voting Item. Mr. Keilty, Endress+Hauser, stated that we could explore adding a RMFD component to LPG to deal with this issue.

This committee feels this item is fully developed and recommends moving this item forward as a Voting Item.

CWMA 2021 Interim Meeting: The committee heard comments from the floor. Loren Minnich-Kansas had issues with the word “licensed”. What does it mean?

CWMA S&T Committee recommends item as developing.

NEWMA 2021 Interim Meeting: During the NEWMA S&T open hearings, no Comments were heard on this item.

The NEWMA Specifications and Tolerances Committee recommends that this item remain in Developing Status.

NEWMA Report: LPG-22.1
Regional recommendation to NCWM on item status: <ul style="list-style-type: none"> <input type="checkbox"/> Recommend as a Voting Item on the NCWM agenda <input type="checkbox"/> Recommend as an Information Item on the NCWM agenda <input type="checkbox"/> Recommend as an Assigned Item on the NCWM agenda (To be developed by an NCWM Task Group or Subcommittee) <input type="checkbox"/> Recommend as a Developing Item on the NCWM agenda (To be developed by source of the proposal) <input type="checkbox"/> Recommend Withdrawal of the Item from the NCWM agenda (In the case of new proposals, do not forward this item to NCWM) <input checked="" type="checkbox"/> No recommendation from the region to NCWM (If this is a new proposal, it will not be forwarded to the national committee by this region)
Comments and justification for the regional recommendation to NCWM: (This will appear in NCWM reports) No comments were heard from the body on this item.

Additional letters, presentation and data may have been submitted for consideration with this item. Please refer to <https://www.ncwm.com/publication-16> to review these documents.

LPG-15.1 D N.3. Test Drafts.

Previously LPG-4

Note: In 2019 this item was combined with Block 1 "Terminology For Testing Standards" and other items that addressed terminology for standards and the use of "master meters." Based on comments heard during the 2021 Annual Meeting, the S&T Committee recommended that all items that were combined with Block 1 "Terminology For Testing Standards" that originally appeared as a separate item or a separate block of items on the S&T agenda prior to 2019, be removed from Block 1 "Terminology For Testing Standards" and appear as originally presented. Item LPG-15.1 was removed from Block 1 "Terminology For Testing Standards" and now appears as a separate item on the 2022 Interim Meeting agenda.

Source:

Endress + Hauser Flowtec AG USA

Purpose:

Amend Handbook 44 to allow field reference standards meters to be used to test and place into service dispensers and delivery system flow meters.

Item Under Consideration:

Amend Handbook 44, LPG and Anhydrous Ammonia Liquid-Measuring Devices as follows:

N.3. Test Drafts.

N.3.1 Minimum Test - Test drafts should be equal to at least the amount delivered by the device in 1 minute at its normal discharge rate.
(Amended 1982)

N.3.2. Field Reference Standard Meter Test. – The minimum quantity for any test draft shall be equal to or greater than the amount delivered in one minute at the flow rate being tested.
(Added 20XX)

Background and Discussion:

This item has been assigned to the submitter for further development. For more information or to provide comment, please contact:

Mr. Michael Keilty
Endress + Hauser Flowtec AG
970-586-2122, michael.keilty@us.endress.com

The use of transfer standards is recognized in Code sections 3.34 Cryogenic Liquid-Measuring Devices Code and 3.38 Carbon Dioxide Liquid-Measuring Devices Code and 3.39 Hydrogen Gas-Measuring Devices – Tentative Code. Transfer standard is only defined for testing cryogenic liquid measuring devices. It has been pointed out that the term transfer standard is not correct and that field reference standard meters may be more appropriate. See new the item under consideration, updated on September 8, 2017.

Field evaluation of LPG meters and CNG dispensers and LNG dispensers is very difficult using volumetric and gravimetric field standards and methods. The tolerances for these applications are such that using field reference standard meters are more efficient and safer. With CNG and LNG and LPG applications, the field reference standard meters are placed in-line with the delivery system as it is used to fill tanks and vehicles. The use of field reference standard meters eliminates return to storage issues. The use of field reference standard meters is easier and faster compared to the use of traditional field standards. The cost of using field reference standard meters and transporting them is much less than the cost of traditional field provers and standards.

Recognition in Handbook 44 will enable States to allow field reference standard meters to place systems into service and for field enforcement.

Volumetric field provers and gravimetric field proving are susceptible to environmental influences. The State of Colorado uses a field reference standard meter to test propane delivery truck meters. The State of Nebraska has used a field reference standard meter to test agricultural chemical meters. Other States have asked that there be recognition in HB44 in order for their State to allow the use of field reference standard meters.

In some applications, field reference standard meters are not more accurate than the meters used in the application. For that reason, longer test drafts and possibly more tests may need to be run.

The State of California is purported to have conducted a short study of field reference standard meters in the past. The conclusion did not lead to wide adoption of the practice.

Section 3.37 Mass Flow Meters user requirement U.R.3.8. Return of Product to Storage, Retail Compressed Natural Gas Dispensers requires that the natural gas which is delivered into the test container must be returned to storage. This is difficult and most often not complied with when the test vessel contents are released to atmosphere. States often have difficulties in remote locations finding suitable field reference equipment.

The Committee initially considered a proposal to modify paragraph N.3. Test Drafts and to add a new paragraph N.3.2. Transfer Standard Test as shown below. Note that, in Fall 2016, Mr. Keilty provided an update to this proposal as shown in the Item Under Consideration above.

N.3. Test Drafts. –

N.3.1 Minimum Test - Test drafts should be equal to at least the amount delivered by the device in one minute at its normal discharge rate.
(Amended 1982)

N.3.2. Transfer Standard Test. – When comparing a meter with a calibrated transfer standard, the test draft shall be equal to at least the amount delivered by the device in 2 minutes at its maximum discharge rate.

The submitter recommended that NIST update EPO 28 for CNG dispensers and EPO 26 for LPG Liquid Measuring Systems to include transfer standard meter tests. NIST Handbook 105-4 should also be revised to specifically address the transfer standard meter and the requirements for use.

The S&T Committee might also consider amending Sections 3.30 Liquid-Measuring Devices Code and 3.31 Vehicle-Tank Meters Code to allow transfer standard meters.

The Committee received written comments on all items in Block 4 and Block 5, as well as LPG-4 and MFM-2 emphasizing the need for there to be more study and discussion of the issues to assess the ramifications of all the proposed changes. The Committee also received written comments from the SMA that it looks forward to further information on these items and stating that it is important to be consistent in our use of terms across multiple sections of NIST Handbook 44. The Committee agreed to carryover this group of items on its 2019 agenda to allow for further discussion and development of these proposals.

NCWM 2019 Interim Meeting: The S&T Committee decided to combine the items on the agenda dealing with the issue of transfer standard (including items already combined into blocks) into one block. Block 1 (New) of the Interim Meeting report now includes Gen-3, Block 1 (original items from the 2019 interim agenda that appeared under Block 1), Block 2, LPG-3 and MFM-5, which were all separate items and blocks of items on the S&T Committee's 2019 Interim Meeting agenda (NCWM Publication 15). Agenda items Gen-3, Block 1, Block 2, LPG-3, and MFM-5 are listed separately on the Interim agenda with a note added beneath each individual item referring the reader to the New B1 items. All items under this New B1 have retained the same numbering system for ease in referring to the appendix for discussion on each item.

2019 NCWM Annual Meeting: Mr. Brett Gurney (NCWM Chairman) commented regarding the formation of a Task Group assigned to further develop this block proposal. The TG is charged with providing definitions for various types of standards (transfer, field, reference, etc.) as well as the criteria to be met by these types of standards. The completion date given to the TG is July 2021. The Committee agreed to the Assigned status for this block of items and looks forward to hearing updates from the TG. the Chair of the task group was:

Mr. Jason Glass
Kentucky Department of Agriculture
502-573-0282, jason.glass@ky.gov

NCWM 2020 Interim Meeting: Field Standard TG Chair Jason reported that the Task Group met prior to the Interim meeting and has begun discussion of the items under Block 1. Mr. Glass stated that bi-weekly teleconference meetings were scheduled and that the group was optimistic but had significant work to accomplish.

Mr. Russ Vires (SMA) supports the Scale item, SCL 18.1; in this block, Mr. Dimitri Karimov (Meter Manufacturers Association) supports the Task Group activities, Ms. Tina Butcher (NIST OWM) was encouraged with the progress on terminology and provided an update on the Mass Flow Meter testing reporting that field testing was conducted October 28 to November 1, 2019 and that State and Industry participation included Colorado, Florida, Oregon, Emerson, and Tulsa Gas Technology.

Mr. Kurt Floren (Los Angeles Co., CA) raised concerns with GEN-19.1. regarding the definition of "Standard, Field" and its reference to "stable" standards and how long a standard is expected to be stable, which is typically 1-year, for which he believes should be longer. Mr. Floren also questioned the statement in the definition "tested over a range of environmental and operational conditions that the measuring devices is used..." Mr. Floren noted that he was unsure if all laboratories will have the capabilities to test over this wide range of conditions. Mr. Floren also expressed concerns with the definition "Standard, Transfer" citing that this standard may not meet the fundamental considerations requirement for standards over a long period of time or wide range of environmental conditions.

Mr. Steve Harrington (OR) echoed Mr. Floren's comments. Field Standard TG Chair Glass responded that these are concerns of the TG and these issues will be discussed and considered as the TG develops these items.

During the Committee's work session, the Committee agreed that this item should remain an Assigned item.

NCWM 2021 Interim Meeting: NCWM Field Standard TG Chair, Mr. Jason Glass (KY) provided an update on the Task Group activities. Mr. Glass reported that the field standard Task Group is following the activities of the NIST Master Meter Project and that the Task Group reviewed API specifications for use of master meters as a standard and a test protocol that will be used to ensure uniformity in collecting data on master meters used as field standards. He also reported that the TG does not have a recommendation for this item. Mr. Glass also reported that he would be stepping down as the TG Chair. Mr. Mike Keilty (Endress+Hauser AG) thanked Chair Glass and the TG for their work and requested that Block 1, LPG-15.1, N.3. and Block 1 MFM-15.1, N.3 be removed from Block 1 items and to allow those items to move forward separate from the other Block 1 Items. Mr. Keilty stated that similar language was added to the Hydrogen code and that the proposed language in LPG-15.1 N.3. and MFM-15.1, N.3 will allow for the recognition of master meters as field standards. Mr. Henry Oppermann (WM-Consulting), stated that data is needed to ensure that master meters can be used over a range of conditions. Mr. Bob Murnane (Seraphin) stated that jurisdictions have the ability to use meters and that Block 1 LPG-15.1, N.3 and Block 1 MM-15.1, N.3 should remain in Block 1 until data is available to support the use of master meters as a standard. Mr. Keilty mentioned that there has been useful dialog regarding master meters in the TG, but that he is concerned that the TG is not close to deciding and he expressed concerns with the TG's focus on the NIST Master Meter Project. Ms. Tina Butcher (NIST OWM) provided an update on the NIST Master Meter Project and noted that States have the regulatory powers to accept or reject a standard. She also mentioned that NIST is working with States to collect data needed to assess master meters and preliminary testing was conducted and data was collected on CNG at Tulsa Gas Technology's facility in fall 2019. Ms. Diane Lee (NIST OWM) noted that NIST OWM feels that it is premature to add more language to the NIST Handbook 44 on master meters without data to support its use.

During the Committee's work session, the Committee agreed to keep all items in Block 1 and that this item should remain with an Assigned status.

NCWM 2021 Annual Meeting: Mr. Glass reported that he would be stepping down as the Field Standard TG Chair. The Committee heard updates from members of the Task Group during open hearings. Mr. Mike Keilty (Endress+Hauser AG) noted that two of the items had been on the agenda since 2015 and requested that they be removed from the block and recommended recognizing the use of master meters. Other comments were to keep the items together until data is analyzed from the NIST Field Reference Standard Work Group to support the use of master meters but that if some items were removed from the block, all items should be removed from the block. Based on comments heard during the 2021 Annual Meeting, the S&T Committee recommended that all items that were included in Block 1 "Terminology For Testing Standards" that originally appeared as a separate item or a separate block of items on the S&T agenda in and prior to 2019, be removed from Block 1 "Terminology For Testing Standards" and appear as originally presented.

During the 2021 Committee work session the Committee recognized that the Task Group has accomplished all it is able to at this point and is recommending the Task Group be disbanded and will make said recommendation to the NCWM Chairman. The Committee agreed to break all items in Block 1 into individual items and designate them all as Developing. The Committee thanks the Task Group and its members for their work.

NCWM 2022 Interim Meeting:

Item under consideration presented to 2022 NCWM Interim meeting as:

N.3. Test Drafts.

N.3.1 Minimum Test - Test drafts should be equal to at least the amount delivered by the device in 1 minute at its normal discharge rate.
(Amended 1982)

N.3.2. Field Reference Standard Meter Test. – The minimum quantity for any test draft shall be equal to or greater than the amount delivered in one minute at the flow rate being tested.
(Added 20XX)

Mr. Keilty shared a presentation on field standard meters during open hearings relevant to both LPG 15.1 and MFM 15.1. The intent of the presentation was to describe initial and ongoing calibration traceability, compare OIML

tolerances vs NIST Handbook 44, describe the benefits and show example. An abbreviated copy of the presentation is available on the NCWM website in the interim meeting documents archive. Mr. Keilty commented that he believes LPG 15.1 and MFM 15.1 are fully developed and should receive voting status for the annual meeting. He has updated the proposal to exclude the term “reference” from “field reference standard meter test”, as shown above. He requests that the committee provide specific guidance if a developing status is assigned. A comment from industry (Bob Murnane – Seraphin) stated that N.3.2 in the proposal conflicts with the current code which states normal test drafts must be at least one minute at the maximum discharge flow rate of installation conditions. The current wording allows for a test to be conducted at any flow rate for one minute. There was concern from a regulator (Charles Stutesman, Kansas) echoing these concerns. Diane Lee (NIST) requested that more data be made available so that NIST is able to compare worldwide data against test data compiled within the US by NIST. Mahesh Albuquerque (Colorado) expressed support for this item to receive voting status. Marc Butler (Emerson Micro Motion) expressed confusion at the two notes, thinking that perhaps they conflicted with each other; are they both needed or are they independent? Tina Butcher (NIST) expressed that she recognizes the use and importance of master meters, but is concerned with the purpose of this item. Tina suggests that the statement for use be reworked as test draft criteria is so critical. Tina recommended and offered NIST OWM assistance on this item.

During the S&T Committee work session, the committee recognized the submitters desire that a voting status be recommended but determined that there were too many concerns and confusion expressed. The committee recommends that the submitter develop the item further by aligning language to existing language in Handbook 44, clarifying the purpose to help avoid confusion of the new code on new equipment, and reaching out to NIST OWM or other industry or regulatory officials for feedback.

Regional Associations’ Comments:

WWMA 2021 Annual Meeting: Michael Keilty (Endress + Hauser) : in 2014 - he submitted a form 15 to edit content and add N.3.2. It was set to developing. Several W/M officials have supported this. Asks that this be a voting item in 2022. Bob Murnane (Seraphin) : this is to allow a field reference standard meter, this definition does not currently exist. Recommends that this be withdrawn so that the definitions can be worked out. Diane Lee (NIST OWM) : this item was put forth in 2015 - purpose was: to accept a specific master meter in the field. It's not necessary to ref. field ref. standards in specific code. NIST and states are working to collect data to see if master meters can be used. States are to determine which standards are to be used in the states. N.3.2 was an issue. there was no information as to justify a different test draft size than was specified in N.3 or if it is necessary to use a field reference meter. Bruce Swiecicki (National Propane Gas Association): he lent support to this discussion (master meters). It would be nice to have something in HB44 to assist in uniformity. Michael Keilty (Endress + Hauser) : to address Diane Lee: he agrees and disagrees. Agree: it was stated that jurisdictions are responsible for their own equipment, however, he was told by states that they need something in HB44 to tell them what should be used. Again - wants voting on this item in 2022.

The WWMA S&T Committee recommends the status remain developmental. The Committee recommends that consideration be made that this item be included in Block 5, as they refer to the same terminology in HB:44. A letter was submitted to the Committee by Michael Keilty (Endress + Hauser) and will be posted to the NCWM website. NIST OWM also submitted analysis on this item which can be found at the following link on the NCWM website : <https://www.ncwm.com/annual-archive>

SWMA 2021 Annual Meeting: Mr. Oppermann, Seraphin, supports the Withdrawal of this item because it is unnecessary, as master meters can already be recognized as field standards. Mr. Keilty, Endress+Hauser, the submitter of this item, supports striking “Reference” and “Meter” from this proposal, and moving it forward as a Voting Item. This committee feels that the item is fully developed and is looking forward to seeing more data on the performance accuracy of master meters by the states that are currently using these devices.

This committee recommends this item move forward as a Voting item with the editorial changes requested by Mr. Keilty.

CWMA 2021 Interim Meeting: The committee heard comments from the floor. Michael Keilty-Endress+Hauser Flow asked that the item be moved to voting and if not, asks for suggestions from the committee on how to improve item. Dr. Henry Opperman-Weights and Measures Consultants does not support the item. Says it does not explain mass flow meter as a standard and where is the data that supports this item. Tina Butcher-NIST agreed with comments

from Dr. Henry Opperman. Charles Stutesman-Kansas agreed with Tina Butcher but understands the submitting of this proposal and should be moved as a voting item.

CWMA S&T Committee recommend this item moving forward as a voting item.

NEWMA 2021 Interim Meeting: Michael Keilty (Endress + Hauser Flowtec) as the submitter of this item, gave a history of the item from 2015 and is recommending voting status with changes striking text seen below. Michael also has submitted comments which are available on the NCWM website.

N.3.2. Field Reference Standard Meter-Test. – The minimum quantity for any test draft shall be equal to or greater than the amount delivered in one minute at the flow rate being tested.
(Added 20XX)

Henry Opperman (Seraphin) commented that the latest information was not reviewed and changes are immature as data has not been produced to justify this. And he added that NIST OWM is currently undertaking a study to gather data and this data could help provide justification for this item and recommends further development. Rick Harshman (NIST OWM and Bob Murnane (Seraphin) also recommended further development.

The NEWMA Specifications and Tolerances Committee recommends that this item remain in Developing Status and asks that the submitter collaborate with NIST and or provide data to support this item.

NEWMA Report: LPG-15.1

Regional recommendation to NCWM on item status:

- ☐ Recommend as a Voting Item on the NCWM agenda
- ☐ Recommend as an Information Item on the NCWM agenda
- ☐ Recommend as an Assigned Item on the NCWM agenda
(To be developed by an NCWM Task Group or Subcommittee)
- ☐ Recommend as a Developing Item on the NCWM agenda
(To be developed by source of the proposal)
- ☒ Recommend Withdrawal of the Item from the NCWM agenda
(In the case of new proposals, do not forward this item to NCWM)
- ☐ No recommendation from the region to NCWM
(If this is a new proposal, it will not be forwarded to the national committee by this region)

Comments and justification for the regional recommendation to NCWM: *(This will appear in NCWM reports)*

Mr. Bob Murnane (Seraphin) commented that he does not believe this item is fully developed and recommended that the committee consider withdrawing the item. Mr. Murnane read from submitted comments. Of note, MR. Murnane indicated that under the Fundamental Considerations in HB44, the State Director has the authority to evaluate standards for use in certifying meters and the fear is that if this proposal goes through, the handbook would have to be changed for each new technology. Mr. Murnane explained that several states have already evaluated meters to use as standards and determined them to be accurate to use. If this proposal is adopted, Mr. Murnane believes that it would take powers away from State Directors to evaluate and use these standards. Ms. Tina Butcher (NIST OWM) commented that the concept of master and reference meter is to use the meter as a standard in place of provers. The authority to use them rests with the State Director, however, there needs to be a method to ensure accuracy. Ms. Butcher mentioned several alternatives as outlined in the submitted NIST analysis.

During open hearings, comments were heard from the floor regarding this item and MFM-15.1 at the same time.

After hearing comments from the floor, the committee does not believe the item is fully developed, even though the item has been on the agenda for several years. The committee recommended that the item be withdrawn.

Additional letters, presentation and data may have been submitted for consideration with this item. Please refer to <https://www.ncwm.com/publication-16> to review these documents.

LPG-22.2 W S.2.6. Zero-Set-Back Interlock, for Stationary Customer-Operated Retail Motor-Fuel Devices, Electronic.

Source:

U-Haul International, Inc.

Purpose:

The proposal will address practical issues that propane marketers encounter when trying to comply with the zero setback requirements for propane stationary and truck-mounted meters in Handbook 44.

Amend Handbook 44, Liquefied Petroleum Gas and Anhydrous Ammonia Liquid-Measuring Devices Cod as follows:

S.2.65.2. Zero-Set-Back Interlock for Stationary Customer-Operated Retail Motor-Fuel Devices - A device shall be constructed so that:

(a) after a delivery cycle has been completed by moving the starting lever to any position that shuts off the device, an automatic interlock prevents a subsequent delivery until the indicating elements and recording elements, if the device is equipped and activated to record, have been returned to their zero positions;

(b) the discharge nozzle cannot be returned to its designed hanging position (that is, any position where the tip of the nozzle is placed in its designed receptacle and the lock can be inserted) until the starting lever is in its designed shut-off position and the zero-set-back interlock has been engaged; and

(c) in a system with more than one dispenser supplied by a single pump, an effective automatic control valve in each dispenser prevents product from being delivered until the indicating elements on that dispenser are in a correct zero position.

[Retroactive Nonretroactive as of January 1, 2017 2023]

(Added 2016, Amended 2022 20XX)

Previous Action:

New

Original Justification:

Motor fuel, within the context of NFPA 58, refers to any container that has the potential to provide propane to fuel an engine. This can include a multitude of DOT cylinders and ASME containers that are not for the propulsion of an automobile. Current mechanical meter technology utilized in a standard propane dispenser for the filling of portable containers, such as those utilized in NFPA 58 for motor fuel applications or those that do power automobiles, are not capable of being equipped with a zero-set-back interlock and the technology will not be potentially available until 2022, per meter manufacturers.

NFPA 58 currently does not allow the public to refuel its automobiles. All automobiles or other containers must be filled by a specially trained employee. A proposed change has been introduced for consideration in the 2023 edition of NFPA 58 that would permit public refueling of automobiles as long as the dispensing system meets very specific safety requirements, including a specialized nozzle, and is furnished with visible instructions. Upon the acceptance of this new public refueling allowance the propane industry agrees that Zero-Setback-interlocks are needed. These public self-service automotive dispensing systems will be listed to Underwriters Laboratories Standard 495 and will be dedicated to the filling of motor vehicles.

Most propane dispensed is for purposes other than motor-fuel. Pursuant to NFPA 58, this is accomplished by a trained and certified employee dispensing propane, typically using mechanical meters, into cylinders and tanks. The employee is trained and required to manually reset the meter to zero after each transaction and verify the meter is reset prior to initiating a subsequent transaction. This has been and remains an accepted practice for dispensing propane. This process is the industry standard for approximately 97% of all propane used in the United States. See U.S. Department of Energy, Alternative Fuels Data Center afdc.energy.gov/fuels/propane_basics.html.

Unlike traditional motor-fuel, such as gasoline or diesel, customers cannot currently dispense propane into their vehicles. If NFPA 58 is amended to allow customers to dispense their own propane into their vehicles and the demand for propane as motor-fuel increases, the market will drive retailers to provide electronic customer-operated retail motor-fuel devices to meet the demand and customer expectations for efficient and expedient fueling transactions. At that time, the electronic customer-operated motor-fuel devices will certainly need to incorporate an automatic zero-set-back interlock. It is simply too early in the process to effectively force mechanical retail motor-fuel devices out of the market for such a small percentage of the retail propane market (approximately 3%).

It is difficult to counter the argument above. Opponents of this proposed change may argue that automatic zero-set-back interlocks are necessary to prevent customers being overcharged for propane.

The submitter requested that this be a Voting Item in 2022.

Comments in Favor:

Regulatory:

- NCWM Interim 2022: Several regulators spoke in favor of this item but suggested that it be assigned a developing status. Comments were heard to keep “customer operated” in the proposal and to work with submitters of LPG-22.3.

Industry:

- NCWM Interim 2022: A propane industry representative speaking on behalf of the submitter commented that this proposal would work well for electronic meters but not analog as they would be costly to retrofit. He also suggested removing “customer operated” but keeping “electronic”. After hearing other comments from the floor, he offered to submit updated language to the committee to correct concerns and asked for a voting status.

Advisory:

-

Comments Against:

Regulatory:

-

Industry:

-

Advisory:

-

Neutral Comments:

Regulatory:

- NCWM Interim 2022: A regulator cautioned that this requirement may not allow electronic meters to meet marking requirements of retail motor fuel devices.

Industry:

-

Advisory:

- NCWM Interim 2022: NIST OWM also indicated that the use of retroactive in the original proposal may not be the intended term and suggested using nonretroactive instead

Item Development:

NCWM 2022 Interim Meeting: During the committee work session, the committee received updated language that renumbered the item to reflect the current handbook and included “nonretroactive” with a new date. The committee agreed to update the item under consideration to reflect these changes. The committee also agreed to assign this item a developing status. The committee asked the submitter to work with the submitter of LPG-22.3 in order to consider combining the items and to make sure the language is consistent with other areas of the handbook.

Following the 2022 Interim Meeting the submitters of this item and Item LPG-22.3 collaborated on a joint proposal as requested. For this reason, the Committee has withdrawn this item. See Item LPG-22.3 for the new proposal.

Regional Associations’ Comments:

WWMA 2021 Annual Meeting: Dwight Farr (U-Haul Program Manager): they proposed this amendment. The majority of propane meters are mechanical - this forces them to switch to electronic. He wants this to only pertain to electronic meters. This will effect the infrastructure growth. This will deter alt. fuel options (sites just will not sell LPG as retail fuel instead of switching to electronic). customer cannot dispense their own LPG - has to be a specially trained associate. setting back every time a single customer brings in multiple tanks will be detrimental to the customer. this only applies to 3% of his customers. Wants this to be a voting item next year. Bruce Swiecicki (National Propane Gas Association): supports this proposal as stated. This will go a long way towards fixing the problem. Cadence Matijevich (Nevada) : Question for submitter: retroactive status? Dwight Farr (U-Haul Program Manager): retroactive to 2017 - law was established at that year. Cadence Matijevich (Nevada): the way it is written, it will not suffice. Dwight Farr (U-Haul Program Manager): if it needs to be changed, so be it.

The WWMA S&T Committee recommends based on testimony heard in open hearings and input from the NIST advisors during the work session that this item be assigned a Developing status. The Committee also recommends that the submitters of LPG-22.2 and LPG-22.3 combine their efforts to develop one of the items with consideration to the 2022 version of NIST HB44.

SWMA 2021 Annual Meeting: Steven Benjamin, North Carolina, stated that he is opposed to this item, because he feels it will allow device manufacturers to cut corners on “full service” devices. Tim Chesser, Arkansas, opposes this item. He stated that it was a bad item, seemed incomplete, and recommended it be withdrawn.

This committee agrees that the item could allow subpar devices to be put into commerce, that the item itself is incomplete, and recommends this item be Withdrawn.

CWMA 2021 Interim Meeting: Committee received updated proposal to S.2.5. and S.2.6 from Bruce Swiecicki - National Propane Gas Association because technology won’t be available till 2022 per manufacturers.

CWMA S&T Committee recommends item move forward as a developing item.

NEWMA 2021 Interim Meeting: No Comments were heard on this item. The NEWMA Specifications and Tolerances Committee recommends that this item remain in Developing Status.

Additional letters, presentation and data may have been submitted for consideration with this item. Please refer to <https://www.ncwm.com/publication-16> to review these documents.

LPG-22.3 D S.2.5. Zero-Set-Back Interlock., S.2.5.2. Zero -Set-Back Interlock for Stationary Customer -Operated Electronic Retail Motor-Fuel Devices.

Source:

National Propane Gas Association and U-Haul International, Inc.

Purpose:

The proposal will address practical issues that propane marketers encounter when trying to comply with the zero-set-back requirements for propane stationary and truck-mounted meters in Handbook 44.

Item Under Consideration:

Amend Handbook 44, Liquefied Petroleum Gas and Anhydrous Ammonia Liquid-Measuring Devices Cod as follows:

S.2.5. Zero-Set-Back Interlock.

S.2.5.1. Zero-Set-Back Interlock, Electronic Stationary Meters (Other than Stationary Retail Motor-Fuel Dispensers) and Electronic Vehicle-Mounted Meters. – A device shall be constructed so that after an individual delivery or multiple deliveries at one location have been completed, an automatic interlock system shall engage to prevent a subsequent delivery until the indicating element and, if equipped, recording element have been returned to their zero positions.

[Nonretroactive as January 1, 2021]

(Added 2019)

(Amended 2021)

S.2.5.2. Zero-Set-Back Interlock for Stationary Customer-Operated Electronic Retail Motor-Fuel Devices. – A device shall be constructed so that:

(a) after a delivery cycle has been completed by moving the starting lever to any position that shuts off the device, an automatic interlock prevents a subsequent delivery until the indicating elements and recording elements, if the device is equipped and activated to record, have been returned to their zero positions;

(b) the discharge nozzle cannot be returned to its designed hanging position (that is, any position where the tip of the nozzle is placed in its designed receptacle and the lock can be inserted) until the starting lever is in its designed shut-off position and the zero-set-back interlock has been engaged; and

(c) in a system with more than one dispenser supplied by a single pump, an effective automatic control valve in each dispenser prevents product from being delivered until the indicating elements on that dispenser are in a correct zero position.

[Nonretroactive as of January 1, 2017]

(Added 2016)

Previous Action:

New

Original Justification:

National Propane Gas Association:

This proposal was developed by the National Propane Gas Association's Technology, Standards and Safety Committee, a volunteer organization comprised of 2500+ members, including propane retail marketers and others providing products or services to the propane industry.

In S.2.5, the removal of the vehicle mounted meters from this two-minute requirement is necessary as the initiation of a vehicle mounted meter is performed at the truck prior to moving the delivery hose to the customer tank, sometimes as far as 150 feet from the meter, or in installations with multiple containers that may require continued adjustment of

containers or delivery hose to complete a delivery. This configuration can lead to periods of up to 5 minutes between initial meter engagement and first container filling or between containers being filled on a single delivery.

In revised S.2.6, we are proposing that vehicle mounted meters be allowed periods between meter engagement and product flow of greater than 2 minutes prior to automated time out initiation. A five-minute period is more practical as the initiation of a vehicle mounted meter is performed at the truck prior to moving the delivery hose to the customer tank, sometimes as far as 150 feet from the meter, or in installations with multiple containers that may require continued adjustment of containers or delivery hose to complete a delivery. The configuration on a typical bobtail can lead to periods of up to 5 minutes between initial meter engagement and first container filling or additionally periods of greater than two minutes can transpire between containers being filled on a single delivery.

Addressing proposed new S.2.7, motor fuel, within the context of NFPA 58, refers to any container that has the potential to provide propane to fuel an engine. This can include a multitude of DOT cylinders and ASME containers that are not for the propulsion of an automobile. Current mechanical meter technology utilized in a standard propane dispenser for the filling of portable containers, such as those utilized in NFPA 58 for motor fuel applications or those that do power automobiles, are not capable of being equipped with a zero-set-back interlock and the technology will not be potentially available until 2022, per meter manufacturers.

NFPA 58 does not currently explicitly allow the public to refuel its automobiles. All automobiles or other containers must be filled by a specially trained employee. A proposed change has been introduced for consideration in the 2023 edition of NFPA 58 that would permit public refueling of automobiles as long as the dispensing system meets very specific safety requirements, including a specialized nozzle, and is furnished with visible instructions. Upon the acceptance of this new public refueling allowance the propane industry agrees that Zero-Setback-interlocks are needed. These public self-service automotive dispensing systems will be listed to Underwriters Laboratories Standard 495 and will be dedicated to the filling of motor vehicles.

In view of the above information, existing dispenser systems that may only be utilized by qualified trained employees should be permitted to continue operations with the existing meter technology and should not be required to include Zero-Set-Back Interlocks. This should include when the dispenser is removed from one location and installed in another, as long as the original meter remains functional. Existing cabinetry and controls utilized in a standard dispenser cabinet generally include non-digital meters and no electronic controls with the exception of a single switch that operates the pump. These simplistic designs are still effective and should not be prohibited from use in future (new) installations in which the transfer process is attended by trained personnel. Limiting the scope of this section will allow attended dispenser operations which are primarily utilized for filling of portable containers to remain consistent in design and construction. Current use of this technology has not resulted in any known impact to the consumer or over-charge situations. The term "self-operated" is used in other locations in Handbook 44 and would include electronic dispensing devices and meters, which would then be consistent with the prior two sections that are limited to electronic meters.

It is difficult to counter the arguments above. The sheer difficulties that a service person can encounter when a wet hose must be carried over terrain fairly long distances between receiving containers should be sufficient justification to approve this proposal. The counter argument to new S.2.7 would be that the customer may not be able to view the meter to ensure it is set back to zero. The submitter requested that this be a Voting Item in 2022.

U-Haul International, Inc.

Motor fuel, within the context of NFPA 58, refers to any container that has the potential to provide propane to fuel an engine. This can include a multitude of DOT cylinders and ASME containers that are not for the propulsion of an automobile. Current mechanical meter technology utilized in a standard propane dispenser for the filling of portable containers, such as those utilized in NFPA 58 for motor fuel applications or those that do power automobiles, are not capable of being equipped with a zero-set-back interlock and the technology will not be potentially available until 2022, per meter manufacturers.

NFPA 58 currently does not allow the public to refuel its automobiles. All automobiles or other containers must be filled by a specially trained employee. A proposed change has been introduced for consideration in the 2023 edition of NFPA 58 that would permit public refueling of automobiles as long as the dispensing system meets very specific safety requirements, including a specialized nozzle, and is furnished with visible instructions. Upon the acceptance of

1 this new public refueling allowance the propane industry agrees that Zero-Setback-interlocks are needed. These public
 2 self-service automotive dispensing systems will be listed to Underwriters Laboratories Standard 495 and will be
 3 dedicated to the filling of motor vehicles.

4 Most propane dispensed is for purposes other than motor-fuel. Pursuant to NFPA 58, this is accomplished by a trained
 5 and certified employee dispensing propane, typically using mechanical meters, into cylinders and tanks. The
 6 employee is trained and required to manually reset the meter to zero after each transaction and verify the meter is reset
 7 prior to initiating a subsequent transaction. This has been and remains an accepted practice for dispensing
 8 propane. This process is the industry standard for approximately 97% of all propane used in the United States. *See*
 9 U.S. Department of Energy, Alternative Fuels Data Center afdc.energy.gov/fuels/propane_basics.html.

10 Unlike traditional motor-fuel, such as gasoline or diesel, customers cannot currently dispense propane into their
 11 vehicles. If NFPA 58 is amended to allow customers to dispense their own propane into their vehicles and the demand
 12 for propane as motor-fuel increases, the market will drive retailers to provide electronic customer-operated retail
 13 motor-fuel devices to meet the demand and customer expectations for efficient and expedient fueling transactions. At
 14 that time, the electronic customer-operated motor-fuel devices will certainly need to incorporate an automatic zero-
 15 set-back interlock. It is simply too early in the process to effectively force mechanical retail motor-fuel devices out
 16 of the market for such a small percentage of the retail propane market (approximately 3%).

17 **Comments in Favor:**

18 **Regulatory:**

- 19 • Several regulators voiced support for this item, including adding the 5 minute timeout to each section.

20 **Industry:**

- 21 • After hearing comments from the floor, the submitter understands that modifications must be made to
 22 the item, in terms of numbering, to line up with the 2022 version of the handbook. The submitter also
 23 now feels that a 2-minute time out may be unattainable and believes a 5 minute timeout would be
 24 appropriate in each section.

25 **Advisory:**

- 26 •

27 **Comments Against:**

28 **Regulatory:**

- 29 • A regulator voiced concern with the intent and indicated that aspects of this proposal are also included
 30 in LPG-22.2 and he is opposed to item, except for the 5- minute timeout being applied.

31 **Industry:**

- 32 •

33 **Advisory:**

- 34 •

35 **Neutral Comments:**

36 **Regulatory:**

- 37 •

38 **Industry:**

- 39 •

40 **Advisory:**

- NIST OWM pointed to new numbering in the 2022 version of the handbook and suggested that the item under consideration be renumbered for accuracy. NIST OWM also noted that the automatic timeout is currently 3 minutes in most other specifications and urged the committee to consider if it is necessary in other applications.

Item Development:

NCWM 2022 Interim Meeting: During the committee work session, the committee reviewed a document that was provided by the submitter with updated language and paragraph numbering, however, members of the committee concluded the proposal was still not fully developed. The committee agreed to amend the proposal as requested by the submitter. The committee recommended the submitter of this item work with the submitter of LPG-22.2 to harmonize the two proposals.

Following the 2022 Interim Meeting, the submitters of this item and Item LPG-22.2 collaborated on a joint proposal as requested. For this reason, the Committee withdrew Item LPG-22.2. See the Item under Consideration for the new joint proposal.

For more information or to provide comment, please contact:

Bruce Swiecicki
National Propane Gas Association
815-806-9035m bswiecicki@npga.org

And

Konrad Pilatowicz
U-Haul International, Inc.
konrad_pilatowicz@uhaul.com

Regional Associations' Comments:

WWMA 2021 Annual Meeting: Bruce Swiecicki (National Propane Gas Association): This addresses two subjects: has to do with zero setback, but were breaking out vehicle meters. In some situations with a bobtail where there may be several tanks not close to one another and the operator has to carry the long hose.. They have to walk from tank to tank. They want more time (5-minute timer). He supports this but wants to break out the systems that aren't used full time for Retail motor fuel. Dwight Farr (U-Haul Program Manager): they are in support of the NPGA proposal. Tina Butcher (NIST OWM): Look at the previous verbiage. The Conference did vote on changes with regard to zero setback and time out in 2021. The paragraph number is different than the 2020 version.

The WWMA S&T Committee recommends based on testimony heard in open hearings and input from the NIST advisors during the work session that this item be assigned a Developing status. The Committee also recommends that the submitters of LPG-22.2 and LPG-22.3 combine their efforts to develop one of the items with consideration to the 2022 version of NIST HB44.

SWMA 2021 Annual Meeting: Steve Benjamin, North Carolina, supports this item. This committee recommends this item move forward as a Voting item.

CWMA 2021 Interim Meeting: Committee received updated proposal to S.2.5. and S.2.6 from Bruce Swiecicki - National Propane Gas Association because technology won't be available 2022 per manufacturers.

CWMA S&T Committee recommends item move forward as a developing item.

NEWMA 2021 Interim Meeting: No Comments were heard on this item. The NEWMA Specifications and Tolerances Committee recommends that this item remain in Developing Status.

NEWMA Report: LPG-22.3	
Regional recommendation to NCWM on item status:	
<input type="checkbox"/>	Recommend as a Voting Item on the NCWM agenda
<input type="checkbox"/>	Recommend as an Information Item on the NCWM agenda
<input type="checkbox"/>	Recommend as an Assigned Item on the NCWM agenda (To be developed by an NCWM Task Group or Subcommittee)
<input type="checkbox"/>	Recommend as a Developing Item on the NCWM agenda (To be developed by source of the proposal)
<input type="checkbox"/>	Recommend Withdrawal of the Item from the NCWM agenda (In the case of new proposals, do not forward this item to NCWM)
<input checked="" type="checkbox"/>	No recommendation from the region to NCWM (If this is a new proposal, it will not be forwarded to the national committee by this region)
Comments and justification for the regional recommendation to NCWM: (This will appear in NCWM reports)	
No comments were heard from the body on this item.	

Additional letters, presentation and data may have been submitted for consideration with this item. Please refer to <https://www.ncwm.com/publication-16> to review these documents.

MFMM – MASS FLOW METERS

MFMM-15.1 D N.3. Test Drafts.

Previously MFMM-2

Note: In 2019 this item was combined with Block 1 “Terminology For Testing Standards” and other items that addressed terminology for standards and the use of “master meters.” Based on comments heard during the 2021 Annual Meeting, the S&T Committee recommended that all items that were combined with Block 1 “Terminology For Testing Standards” that originally appeared as a separate item or a separate block of items on the S&T agenda prior to 2019, be removed from Block 1 “Terminology For Testing Standards” and appear as originally presented. Item MFMM-15.1 was removed from Block 1 “Terminology For Testing Standards” and now appears as a separate item on the 2022 Interim Meeting agenda.

Source:

Endress + Hauser Flowtec AG USA

Item Under Consideration:

Amend Handbook 44, Mass Flow Meters Code as follows:

N.3. Test Drafts.

N.3.1 Minimum Test - The minimum test shall be one test draft at the maximum flow rate of the installation and one test draft at the minimum flow rate. More tests may be performed at these or other flow rates. (See T.3. Repeatability.)
(Amended 1982 **and 20XX**)

N.3.2. Field Reference Standard Meter Test. – The minimum quantity for any test draft shall be equal to or greater than the amount delivered in one minute at the flow rate being tested.

(Added 20XX)

Background/Discussion:

This item has been assigned to the submitter for further development. For more information or to provide comment, please contact:

Mr. Michael Keilty
Endress + Hauser Flowtec AG USA
970-586-2122, michael.keilty@us.endress.com

The use of transfer standards is recognized in Code sections 3.34 Cryogenic Liquid-Measuring Devices Code and 3.38 Carbon Dioxide Liquid-Measuring Devices Code and 3.39 Hydrogen Gas-Measuring Devices – Tentative Code. Transfer standard is only defined for testing cryogenic liquid measuring devices. It has been pointed out that the term transfer standard is not correct and that field reference standard meters may be more appropriate. See new the item under consideration, updated on September 8, 2017.

Field evaluation of LPG meters and CNG dispensers and LNG dispensers is very difficult using volumetric and gravimetric field standards and methods. The tolerances for these applications are such that using field reference standard meters are more efficient and safer. With CNG and LNG and LPG applications, the field reference standard meters are placed in-line with the delivery system as it is used to fill tanks and vehicles. The use of field reference standard meters eliminates return to storage issues. The use of field reference standard meters is easier and faster compared to the use of traditional field standards. The cost of using field reference standard meters and transporting them is much less than the cost of traditional field provers and standards.

Recognition in Handbook 44 will enable States to allow field reference standard meters to place systems into service and for field enforcement.

Volumetric field provers and gravimetric field proving are susceptible to environmental influences. The State of Colorado uses a field reference standard meter to test propane delivery truck meters. The State of Nebraska has used a field reference standard meter to test agricultural chemical meters. Other States have asked that there be recognition in HB44 in order for their State to allow the use of field reference standard meters.

In some applications, field reference standard meters are not more accurate than the meters used in the application. For that reason, longer test drafts and possibly more tests may need to be run.

The State of California is purported to have conducted a short study of field reference standard meters in the past. The conclusion did not lead to wide adoption of the practice.

Section 3.37 Mass Flow Meters user requirement U.R.3.8. Return of Product to Storage, Retail Compressed Natural Gas Dispensers requires that the natural gas which is delivered into the test container must be returned to storage. This is difficult and most often not complied with when the test vessel contents are released to atmosphere. States often have difficulties in remote locations finding suitable field reference equipment.

In the fall of 2016, Mr. Keilty provided an update to the Item under Consideration. That update appears in the agenda. The previous proposed Item under Consideration was as follows:

N.3. Test Drafts. –

N.3.1 Minimum Test - Test drafts should be equal to at least the amount delivered by the device in one minute at its normal discharge rate.
(Amended 1982)

N.3.2. Transfer Standard Test. – When comparing a meter with a calibrated transfer standard, the test draft shall be equal to at least the amount delivered by the device in 2 minutes at its maximum discharge rate.

The submitter recommends that NIST update EPO 28 for CNG dispensers and EPO 26 for LPG Liquid Measuring Systems to include transfer standard meter tests. NIST Publication R 105-4 should also be revised to specifically address the transfer standard meter and the requirements for use.

The S&T Committee might also consider amending Sections 3.30 Liquid-Measuring Devices Code and 3.31 Vehicle-Tank Meters Code to allow transfer standard meters.

The Committee received written comments on all items in Block 4 and Block 5, as well as LPG-4 and MFM-2 emphasizing the need for there to be more study and discussion of the issues to assess the ramifications of all the proposed changes. The Committee also received written comments from the SMA that it looks forward to further information on these items and stating that it is important to be consistent in our use of terms across multiple sections of Handbook 44. The Committee agreed to carryover this group of items on its 2019 agenda to allow for further discussion and development of these proposals.

NCWM 2019 Interim Meeting: The S&T Committee decided to combine the items on the agenda dealing with the issue of transfer standard (including items already combined into blocks) into one block. Block 1 (New) of the Interim Meeting report now includes GEN-3, Block 1 (original items from the 2019 interim agenda that appeared under Block 1), Block 2, LPG-3, and MFM-5, which were all separate items and blocks of items on the S&T Committee's 2019 Interim Meeting agenda (NCWM Publication 15). Agenda items GEN-3, Block 1, Block 2, LPG-3, and MFM-5 are listed separately on the Interim agenda with a note added beneath each individual item referring the reader to the New B1 items. All items under this New B1 have retained the same numbering system for ease in referring to the appendix for discussion on each item.

NCWM 2019 Annual Meeting: Mr. Brett Gurney (NCWM Chairman) commented regarding the formation of a Task Group assigned to further develop this block proposal. The TG is charged with providing definitions for various types of standards (transfer, field, reference, etc.) as well as the criteria to be met by these types of standards. The completion date given to the TG is July 2021. The Committee agreed to the Assigned status for this block of items and looks forward to hearing updates from the TG. The Chair of the task group was:

Mr. Jason Glass
Kentucky Department of Agriculture
502-573-0282, jason.glass@ky.gov

NCWM 2020 Interim Meeting: Field Standard TG Chair, Jason Glass reported that the Task Group met prior to the Interim meeting and has begun discussion of the items under Block 1. Mr. Glass stated that bi-weekly teleconference meetings were scheduled and that the group was optimistic but had significant work to accomplish.

Mr. Russ Vires (SMA) supports the Scale item, SCL 18.1; in this block, Mr. Dimitri Karimov (Meter Manufacturers Association) supports the Task Group activities, Ms. Tina Butcher was encouraged with the progress on terminology and provided an update on the Mass Flow Meter testing reporting that field testing was conducted October 28 to November 1, 2019 and that State and Industry participation included Colorado, Florida, Oregon, Emerson, and Tulsa Gas Technology.

Mr. Kurt Floren (Los Angeles Co., CA) raised concerns with GEN-19.1. regarding the definition of "Standard, Field" and its reference to "stable" standards and how long a standard is expected to be stable, which is typically 1-year, for which he believes should be longer. Mr. Floren also questioned the statement in the definition "tested over a range of environmental and operational conditions that the measuring devices is used..." Mr. Floren noted that he was unsure if all laboratories will have the capabilities to test over this wide range of conditions. Mr. Floren also expressed concerns with the definition "Standard, Transfer" citing that this standard may not meet the fundamental considerations requirement for standards over a long period of time or wide range of environmental conditions.

Mr. Steve Harrington (OR) echoed Mr. Floren's comments. Field Standard TG Chair Glass responded that these are concerns of the TG and these issues will be discussed and considered as the TG develops these items.

During the Committee's work session, the Committee agreed that this item should remain an Assigned item.

NCWM 2021 Interim Meeting: NCWM Field Standard TG Chair, Mr. Jason Glass (KY) provided an update on the Task Group activities. Mr. Glass reported that the field standard Task Group is following the activities of the NIST Master Meter Project and that the Task Group reviewed API specifications for use of master meters as a standard and a test protocol that will be used to ensure uniformity in collecting data on master meters used as field standards. Mr. Glass also reported that the TG does not have a recommendation for this item. Mr. Glass also reported that he would be stepping down as the TG Chair. Mr. Mike Keilty (Endress+Hauser AG) thanked Chair Glass and the TG for their work and requested that Block 1, LPG-15.1, N.3. and Block 1 MFM-15.1, N.3 be removed from Block 1 items and to allow those items to move forward separate from the other Block 1 Items. Mr. Keilty stated that similar language was added to the Hydrogen code and that the proposed language in LPG-15.1 N.3. and MFM-15.1, N.3 will allow for the recognition of master meters as field standards. Mr. Henry Oppermann (W&M Consulting), stated that data is needed to ensure that master meters can be used over a range of conditions. Mr. Bob Murnane (Seraphin) stated that jurisdictions have the ability to use meters and that Block 1 LPG-15.1, N.3 and Block 1 MM-15.1, N.3 should remain in Block 1 until data is available to support the use of master meters as a standard. Mr. Keilty mentioned that there has been useful dialog regarding master meters in the TG, but that he is concerned that the TG is not close to deciding and he expressed concerns with the TG's focus on the NIST Master Meter Project. Ms. Tina Butcher (NIST OWM) provided an update on the NIST Master Meter Project and noted that States have the regulatory powers to accept or reject a standard. She also mentioned that NIST is working with States to collect data needed to assess master meters and preliminary testing was conducted and data was collected on CNG at Tulsa Gas Technology's facility in fall 2019. Ms. Diane Lee (NIST OWM) noted that NIST OWM feels that it is premature to add more language to the NIST Handbook 44 on master meters without data to support its use.

During the Committee's work session, the Committee agreed to keep all items in Block 1 and that this item should remain with an Assigned status.

NCWM 2021 Annual Meeting: Mr. Glass reported that he would be stepping down as the Field Standard TG Chair. The Committee heard updates from members of the Task Group during open hearings. Mr. Michael Keilty noted that two of the items had been on the agenda since 2015 and requested that they be removed from the block and recommended recognizing the use of master meters. Other comments were to keep the items together until data is analyzed from the NIST Field Reference Standard Work Group to support the use of master meters but that if some items were removed from the block, all items should be removed from the block. Based on comments heard during the 2021 Annual Meeting, the S&T Committee recommended that all items that were included in Block 1 "Terminology For Testing Standards" that originally appeared as a separate item or a separate block of items on the S&T agenda in and prior to 2019, be removed from Block 1 "Terminology For Testing Standards" and appear as originally presented.

During the 2021 Committee work session the Committee recognized that the Task Group has accomplished all it is able to at this point and is recommending the Task Group be disbanded and will make said recommendation to the NCWM Chairman. The Committee agreed to break all items in Block 1 into individual items and designate them all as Developing. The Committee thanks the Task Group and its members for their work.

NCWM 2022 Interim Meeting:

Item under consideration presented to 2022 NCWM Interim meeting as:

N.3. Test Drafts.

N.3.1 Minimum Test - The minimum test shall be one test draft at the maximum flow rate of the installation and one test draft at the minimum flow rate. More tests may be performed at these or other flow rates. (See T.3. Repeatability.)

(Amended 1982 **and 20XX**)

N.3.2. Field Reference Standard Meter Test. – The minimum quantity for any test draft shall be equal to or greater than the amount delivered in one minute at the flow rate being tested.

(Added 20XX)

Mr. Keilty shared a presentation on field standard meters during open hearings relevant to both MFM 15.1 and LPG 15.1. The intent of the presentation was to describe initial and ongoing calibration traceability, compare OIML tolerances vs NIST Handbook 44, describe the benefits and show example. An abbreviated copy of the presentation is available on the NCWM website in the interim meeting documents archive. Mr. Keilty commented that he believes MFM 15.1 and LPG 15.1 are fully developed and should receive voting status for the annual meeting. He has updated the proposal to exclude the term “reference” from “field reference standard meter test”, as shown above. He requests that the committee provide specific guidance if a developing status is assigned. A comment from industry (Bob Murnane – Seraphin) stated that N.3.2 in the proposal conflicts with the current code which states normal test drafts must be at least one minute at the maximum discharge flow rate of installation conditions. The current wording allows for a test to be conducted at any flow rate for one minute. There was concern from a regulator (Charles Stutesman, Kansas) echoing these concerns. Diane Lee (NIST) requested that more data be made available so that NIST is able to compare worldwide data against test data compiled within the US by NIST. Mahesh Albuquerque (Colorado) expressed support for this item to receive voting status. Marc Butler (Emerson Micro Motion) expressed confusion at the two notes, thinking that perhaps they conflicted with each other; are they both needed or are they independent? Tina Butcher (NIST) expressed that she recognizes the use and importance of master meters, but is concerned with the purpose of this item. Tina suggests that the statement for use be reworked as test draft criteria is so critical. Tina recommended and offered NIST OWM assistance on this item.

During the S&T Committee work session, the committee recognized the submitters desire that a voting status be recommended but determined that there were too many concerns and confusion expressed. The committee recommends that the submitter develop the item further by aligning language to existing language in Handbook 44, clarifying the purpose to help avoid confusion of the new code on new equipment, and reaching out to NIST OWM or other industry or regulatory officials for feedback.

Regional Associations’ Comments:

WWMA 2021 Annual Meeting: Michael Keilty (Endress + Hauser): companion item to LPG-15.1. this is enabling language. Wants this to be a voting item in 2022. Bob Murnane (Seraphin): does not recognize the verbiage, needs a definition - see previous comments (referencing LPG-15.1, field reference standard meter). Diane Lee (NIST OWM): agree with Michael about companion item. Clarification to both items: MFM-15.1 - in HB the purpose statement is not there. In Amendment A there is already criteria there. Needed justification for language in N.3.2 - standard meter test - the min. quant. for any test draft shall be equal to or greater than am. delivered in 1 min. of the amount being tested. in CNG there is a 1/3 test being conducted. it wouldn’t even take a minute to deliver. the question was: how do you come up with 1 min. and this would not be appropriate for all master meters. Michael Keilty (Endress + Hauser): addressing Diane: in 2016 there was supposed to be a vote. NIST tech. adviser brought this up. There was a revision to the time to be extended. CNG is completely separate, EPO does say 1/3 but that was when CNG tanks were small (delivered at lower flow rate and shorter time). Mr. Wagner can verify, he made it 1 min. because N.3.1 says one test draft at the max. flow rate and one at the min. flow rate of installation. The WWMA S&T Committee recommends the status remain developmental.

The Committee recommends that consideration be made that this item be included in Block 5, as they refer to the same terminology in HB:44. A letter was submitted to the Committee by Michael Keilty (Endress + Hauser) and will be posted to the NCWM website. NIST OWM also submitted analysis on this item which can be found at the following link on the NCWM website: <https://www.ncwm.com/annual-archive>

SWMA 2021 Annual Meeting: Mr. Oppermann, Seraphin, stated that this creates a conflict with the Mass Flow Meter code regarding the minimum test. He also stated that he believes this item is unnecessary, because Field Standard Tests are already specified. Mr. Keilty, Endress+Hauser, the submitter, suggested an editorial revision to some terms. He stated that he simply wants the use of master meters recognized as Field Standards and recommends tis item be oved forward as Voting with the revisions made.

This committee feels this item is fully developed and recommends it be moved forward as a Voting item.

CWMA 2021 Interim Meeting: Michael Keilty-Endress+Hauser Flow asked that the item be moved to voting and if not, asks for suggestions from the committee on how to improve item. Dr. Henry Opperman-Weights and Measures Consultants does not support the item. Says it does not explain mass flow meter as a standard and where is the data

that supports this item. Tina Butcher-NIST agreed with comments from Dr. Henry Opperman. Charles Stutesman-Kansas agreed with Tina Butcher but understands the submitting of this proposal and should be moved as a voting item.

CWMA S&T Committee recommend this item moving forward as a voting item.

NEWMA 2021 Interim Meeting: Michael Keilty (Endress + Hauser Flowtec) commented and recommended voting status with the changes below.

N.3.2. Field Reference Standard Meter Test. – The minimum quantity for any test draft shall be equal to or greater than the amount delivered in one minute at the flow rate being tested.

(Added 20XX)

Rich Harshman (NIST OWM) commented and discussions were had regarding states meeting the requirement of flow time that may be less than the one minute flow in N.3.2. Michael Keilty responded that new equipment is in place and will meet the requirement in N.3.2. Henry Opperman (Weights and Measures Consulting) commented that some NTEP certs may have been issued that would not meet the N.3.2 in this proposal. The committee would like to have clarification on questions regarding the current NTEP certs and test draft sizes that are currently being used.

The NEWMA Specifications and Tolerances Committee recommends that this item remain in Developing Status.

NEWMA Report: MFM-15.1
<p>Regional recommendation to NCWM on item status:</p> <p> <input type="checkbox"/> Recommend as a Voting Item on the NCWM agenda <input type="checkbox"/> Recommend as an Information Item on the NCWM agenda <input type="checkbox"/> Recommend as an Assigned Item on the NCWM agenda <i>(To be developed by an NCWM Task Group or Subcommittee)</i> <input type="checkbox"/> Recommend as a Developing Item on the NCWM agenda <i>(To be developed by source of the proposal)</i> <input checked="" type="checkbox"/> Recommend Withdrawal of the Item from the NCWM agenda <i>(In the case of new proposals, do not forward this item to NCWM)</i> <input type="checkbox"/> No recommendation from the region to NCWM <i>(If this is a new proposal, it will not be forwarded to the national committee by this region)</i> </p>
<p>Comments and justification for the regional recommendation to NCWM: <i>(This will appear in NCWM reports)</i></p> <p>Mr. Bob Murnane (Seraphin) commented that he does not believe this item is fully developed and recommended that the committee consider withdrawing the item. Mr. Murnane read from submitted comments. Of note, MR. Murnane indicated that under the Fundamental Considerations in HB44, the State Director has the authority to evaluate standards for use in certifying meters and the fear is that if this proposal goes through, the handbook would have to be changed for each new technology. Mr. Murnane explained that several states have already evaluated meters to use as standards and determined them to be accurate to use. If this proposal is adopted, Mr. Murnane believes that it would take powers away from State Directors to evaluate and use these standards. Ms. Tina Butcher (NIST OWM) commented that the concept of master and reference meter is to use the meter as a standard in place of provers. The authority to use them rests with the State Director, however, there needs to be a method to ensure accuracy. Ms. Butcher mentioned several alternatives as outlined in the submitted NIST analysis.</p> <p>During open hearings, comments were heard from the floor regarding this item and LPG-15.1 at the same time.</p> <p>After hearing comments from the floor, the committee does not believe the item is fully developed, even though the item has been on the agenda for several years. The committee recommended that the item be withdrawn.</p>

Additional letters, presentation and data may have been submitted for consideration with this item. Please refer to <https://www.ncwm.com/publication-16> to review these documents.

MFM-22.1 V Table T.2. Accuracy Classes and Tolerances for Mass Flow Meters.

Source:

NIST, Office of Weights and Measures

Purpose:

Currently Handbook 44, Section 3.37 Mass Flow Meters Code paragraph A.2. Vapor (Gases) recognizes measurements of hydrocarbon gases, but the code is silent to this product application in Table T.2 Accuracy Classes and Tolerances for Mass Flow Meters. This proposed modification to Table T.2 clarifies the tolerances the code developers intended to apply to hydrocarbon gas measurements. The amendment of Table T.2. will assist officials and industry by providing the exact tolerances applicable to hydrocarbon gas measurements and eliminate any need to borrow tolerances established and deemed appropriate for similar gas applications in this code (i.e., compressed natural gas) or from other code sections.

Item Under Consideration:

Amend Handbook 44, Mass Flow Meters Code as follows:

Table T.2. Accuracy Classes and Tolerances for Mass Flow Meters				
Accuracy Class	Application or Commodity Being Measured	Acceptance Tolerance	Maintenance Tolerance	Special Tolerance
.
.
2.0	- Compressed natural gas as a motor-fuel <u>- All other hydrocarbon gases and any other hydrocarbon gas/air mix applications not shown in the table</u>	1.5 %	2.0 %	2.0 %
.
.

Previous Action:

New

Original Justification:

Since the 1991 adoption of the Mass Flow Meters (MFM) Code the Application section of the code has recognized devices designed to dynamically measure the mass in two applications; liquids and hydrocarbon gas in the vapor state. In fact, these applications remain unchanged in the current 2020 handbook. These applications will not change with the upcoming publication of the 2022 edition of the handbook in late fall 2021.

Table T.2 Accuracy Classes and Tolerances for Mass Flow Meters was included in the MFM Code in 1994 in response to criticism that mass flow meters had an unfair advantage over other metering technology when used in the same product applications. Including Table T.2. in the code also resulted in corresponding requirements for marking a mass flow meter with an accuracy class to which the device is expected to perform. The tolerance table format has aligned the tolerances for similar product applications across multiple measuring device codes throughout the handbook (except in the codes for milk meters and electric vehicle fueling systems).

Prior to amending the MFM Code in 1994 to include the new tolerance table format there were only two applicable tolerances for MFM, they were designated paragraphs T.2 and T.3 as follows:

Tolerance paragraphs T.2 and T.3 shown below were excerpted from the 1992 edition of NIST Handbook 44 MFM Code

T.2. Tolerances for Liquid-Measuring Devices. – The maintenance tolerance shall be 0.5 percent of the measured quantity. The acceptance tolerance shall be 0.3 percent of the measured quantity.

T.3. Tolerances for Vapor-Measuring Devices. – Maintenance and acceptance tolerances for mass flow meters shall be 2.0 percent and 1.5 percent, respectively.

The original Acceptance Tolerance of 1.5 percent and Maintenance Tolerance of 2.0 percent applicable to gaseous products were never modified and deemed also applicable to the compressed natural gas (CNG) motor fuel product application when CNG was recognized for the first time in the MFM Code in 1994 as part of new Table T.2. Accuracy Classes and Tolerances for Mass Flow Meters. Multiple new product applications were added to the new tolerance table in the MFM Code in 1994, but these applications and products were consistent with those recognized in tolerance tables in other measuring device codes. It should be noted that the modification of the MFM tolerances in 1994 did not result in the carryover of the gas tolerances and designation of the corresponding new accuracy class to the hydrocarbon vapor product application that appeared in paragraph A.2 Vapor (Gases).

During the January 2021 NCWM Interim Meeting, Mr. Michael Keilty (Endress+Hauser Flow) noted that there is no specific tolerance recognized in MFM Code Table T.2 for “other gases.” Consequently, this 2022 proposal is being submitted to amend the MFM Code to include the hydrocarbon vapor product application under current Accuracy Class 2.0 along with CNG engine fuel because it appears hydrocarbon gases in the vapor state were inadvertently overlooked in 1994 when the liquid/vapor (T.2./T.3.) tolerance paragraphs were moved into Table T.2. under a single table format that specifies all tolerances applicable to mass flow meters.

This proposal is a housekeeping item that clarifies the originally intended hydrocarbon (HC) vapor products tolerances that should have carried over from paragraph format to a new table format (Table T.2.) during the 1994 modification of the NIST Handbook 44 Section 3.37 Mass Flow Meters Code. The primary intent of the 1994 amendments to the code were to recognize for the first time compressed natural gas as an engine fuel when sold through a retail motor-fuel dispenser. It should be noted that HC vapor products and their corresponding tolerances (i.e., Acceptance of 1.5 percent and Maintenance of 2.0 percent) had been recognized since the 1991 adoption of the code. Should the community receive comments in opposition to or be questioned about the appropriateness of using the 1991 levels of permissible error for HC vapor products; measuring device manufacturers, laboratories and regulatory officials are being advised about this proposal and solicited for their input. Hearing no opposition to the proposal the community can move forward to correct the 1994 oversight. Requests to include the recognition of newer product applications in this proposal might be considered in 2022. However, if there is not sufficient data to support adding other products to the Table T.2 tolerances at this time, it is recommended these additional new product applications become a separate proposal or be revisited in 2023 or a later date.

The submitter requested that this be a Voting Item in 2022.

Comments in Favor:

Regulatory:

- Matt Douglas (California) supports as a voting item.

Industry:

- Michael Keilty (Endress + Hauser) is in support for voting.
- Marc Buttler (Emerson-Micro Motion) supports item as voting.
- Dimitri Karimov (Meter Manufacture Association) supports item as a voting item.

Advisory:

- Juana Williams (NIST) gave a brief explanation of the table and cleanup and expressed her support of a voting status for this item.

Comments Against:

Regulatory:

- Charlie Stutesman (Kansas) opposes the item in the context of questioning whether manufactures of the devices can meet the prescribed tolerances for hydrocarbon vapor meters.

Industry:

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Advisory:

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Neutral Comments:**Regulatory:**

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Industry:

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Advisory:

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Item Development:

NCWM 2022 Interim Meeting: Based on comments in support of this item heard during the open hearings, the committee recommends this item move forward with a voting status.

Regional Associations' Comments:

WWMA 2021 Annual Meeting: Matt Douglas (California - DMS): The language is clarifying. CA DMS supports this item. Michael Keilty (Endress + Hauser): states other gasses (hydrocarbon gasses). Solves issue with blended gasses. He supports this item.

The WWMA S&T Committee recommends that this item be assigned a Voting status. The Committee agrees that this item has merit and is fully developed.

SWMA 2021 Annual Meeting: Mr. Keilty, Endress+Hauser, commented that this item is a simple language cleanup from NIST, and that he supports moving it forward as a Voting item.

This committee recommends moving this item forward as a Voting item.

CWMA 2021 Interim Meeting: Michael Keilty-Endress+Hauser Flow asked that item be moved to voting item.

CWMA S&T Committee recommends item move forward as a voting item.

NEWMA 2021 Interim Meeting: Juana Williams (NIST OWM) commented that this is a housekeeping item that adds clarification. Michael Keilty (Endress + Hauser Flowtec), Lou Sakin, (Hopkinton/Northbridge, MA) and Jim Willis (New York) agreed with and recommended Voting Status for this item.

The NEWMA Specifications and Tolerances Committee recommends that this item be moved forward with a Voting Status.

NEWMA Report: MFM-22.1**Regional recommendation to NCWM on item status:**

- ☒ Recommend as a Voting Item on the NCWM agenda
☐ Recommend as an Information Item on the NCWM agenda
☐ Recommend as an Assigned Item on the NCWM agenda
(To be developed by an NCWM Task Group or Subcommittee)
☐ Recommend as a Developing Item on the NCWM agenda

<p><i>(To be developed by source of the proposal)</i></p> <p><input type="checkbox"/> Recommend Withdrawal of the Item from the NCWM agenda <i>(In the case of new proposals, do not forward this item to NCWM)</i></p> <p><input type="checkbox"/> No recommendation from the region to NCWM <i>(If this is a new proposal, it will not be forwarded to the national committee by this region)</i></p>
<p>Comments and justification for the regional recommendation to NCWM: <i>(This will appear in NCWM reports)</i></p> <p>Ms. Tina Butcher (NIST OWM) commented that this is a housekeeping item. The intent of this item is to add reference to all hydrocarbon gasses and mixtures to the tolerance table as they were inadvertently omitted during previous updates to this section of the handbook.</p> <p>After hearing comments from the floor, the committee considered the item to be fully developed and recommended that the item retains voting status.</p>

Additional letters, presentation and data may have been submitted for consideration with this item. Please refer to <https://www.ncwm.com/publication-16> to review these documents.

EVF – ELECTRIC VEHICLE FUELING SYSTEMS

EVF-21.1 D A.1. General

Source:

ABB, BTCPower, Electrify America, Edison Electric Institute, EVConnect, EVgo, Greenlots, Rivian, Siemens, Tesla, Tritium

Purpose:

To provide clarity on how Handbook 44, Sec. 3.4 tentative code will apply to existing EVSE that are in the ground before it becomes effective by identifying which elements are non-retroactive.

Item Under Consideration:

Amend Handbook 44, Electric Vehicle Fueling Systems as follows:

A.1. General – This code applies to devices, accessories, and systems used for the measurement of electricity dispensed in vehicle fuel applications wherein a quantity determination or statement of measure is used wholly or partially as a basis for sale or upon which a charge for service is based.

A.1.1 Effective Dates for DC EVSE – All DC EVSE used for commercial purposes and put into service on or before January 1, 2023 are exempt from this standard for a period of 10 years from the date put into service. comply

A.1.2 Effective Dates for AC EVSE – All AC EVSE used for commercial purposes and put into service on or before January 1, 2022 are exempt from this standard for a period of 10 years from the date put into service.

Previous Action:

- 2021: Developing Item

Original Justification:

While it is important to ensure that consumers are receiving accurate and transparent information regarding the accuracy of EV charging stations, the cost to retrofit existing stations that often do not include an integrated meter, especially DCFC where commercial DC metering technology is not readily available today, will be cost prohibitive. In CA Initial Statement of Reasons (ISOR) for adopting specifications and tolerances requirement for commercial EVSE, CA estimated that it costs approximately \$4,500 to upgrade existing Level 2 stations and \$20,000 to upgrade existing DCFC. To put this into context, CA DMS utilized 2015 DOE data stating that the average commercial Level

2 EVSE costs between \$3,000-\$6,000 and the average DCFC up to \$40,000 or more. The retrofit costs would represent a significant investment amount that does not seem warranted. The ISOR is available here: https://www.cdfa.ca.gov/dms/pdfs/regulations/EVSE_ISOR.pdf. According to DOE AFDC station locator there are 23,000 level 2 station with 66,000 connectors in the U.S. and 3,700 DCFC stations with 14,000 connectors. Being conservative and utilizing just the number of stations, it would cost \$92M to upgrade the existing Level 2 station in the U.S. today and \$74M to upgrade the existing DCFC stations, a number that is expected to grow as more stations are deployed. Placing this excessive upgrade burden on manufacturers and network operators is not feasible and an alternative pathway needs to be explored to ensure consumer transparency and EVSE accuracy for existing stations without requiring extensive retrofits. This number also does not include the amount of public funding across various states that has been invested in these EVSE that would prematurely potentially be ripped out and replaced. It could also have the unintended consequence that the EV industry stops charging for charging services at existing sites or shut them down if the investment in retrofits is greater than the benefit of continuing to operate. Stranded assets across the country are a valid concern and should not be taken lightly. It is important to not prematurely replace EVSE in the field until the useful life of the system has been obtained. Spending a significant amount of capital to upgrade existing stations rather than investing in new infrastructure does not appear aligned with EV deployment goals. Therefore, it is recommended that there is consideration for making sure requirements are non-retroactive and there is a phase in timeline for existing stations. The language utilized above is similar to what CA DMS implemented, which was the first state to adopt a version of Handbook 44 Sec 3.4 for EVSE. The date for DC EVSE is set at January 1, 2023 to match California's timeline but also because this is when DC metering technology is expected to be commercially available in the market and integrated into DC EVSE by most EVSE manufacturers that are either working on their own product or with third party meter manufacturers.

In general, it appears that there is some openness to considering how legacy EVSE that are in the ground today should be treated when considering that DC metering technology integrated into the EVSE was not commercially available when many of these stations were developed. The main concern that has been raised is regarding whether there should be an overall exemption for existing EVSE to the measurement provisions in HB 44 Sec 3.4 or whether existing EVSE should be exempt from certain requirements in the subsections of Sec 3.4 that are not feasible to attain. In reviewing the subsections of Sec 3.4, the proposal submitters determined that it would not be feasible to meet most subsections of Sec 3.4 with equipment that is in the ground with the exception of S.5 Marking (except S.5.2) and S.6 printing requirements. To ensure there is not confusion between which stations were in the ground prior to dates referenced above, EVSE owners and operators will need to work with local weights and measures officials on a self-reporting mechanisms or some other mechanism for tracking station service dates. CA will be the first state that will need to determine how this process will operate in the field given it has already adopted the exemption noted above and compliance for new AC stations is effective January 1, 2021. On the consumer side, EVSE operators and owners today can provide certain provisions to ensure the accuracy of the commercial transaction that can be facilitated outside of having a meter integrated into the EVSE. For instance, some owners and operators may be able to utilize the accuracy that is traceable via the measurement technology in the EV that accounts for any losses and ensure the consumer is being accurately and fairly billed for what he or she is receiving.

The submitter requested voting status for this item in 2021.

Comments in Favor:

Regulatory:

- 2021 Interim: Mr. Samuel Ferris (California) supported Developing status but noted that an exemption from requirements in the handbook is not common and that the life span of the equipment may only be seven to ten years.
- 2022 Interim: A regulator from Nevada supports developing status.
- 2022 Interim: A regulator from New York supports developing status and looks forward to reasonable modifications of the proposal by the submitter. He does not favor a 10-year grace period and wishes for a permanent code status.

Industry:

- 2021 Interim: Ms. Francesca Wahl (Tesla) and Mr. Keith Bradley (Electrify America) supported Developing status.

- 2021 Interim: Ms. Francesca Wahl (Tesla) supported this item.
- 2021 Interim: Mr. Kevin Miller (Charge Point) expressed concerns with allowing an exemption for 10-years and equipment should be able to meet the requirements and supports a Developing status for this item.
- 2021 Annual: Ms. Francesca Wahl (Tesla) noted that she will be working to incorporate feedback and will work with the EVF National Work group to develop an updated proposal. Ms. Wahl also provided a letter to the S&T Committee concerning the Developing status for this item.
- 2022 Interim: A member of the submitting group recommends developing status and provided background and stated they are working on revised draft for proposal. The submitters worked with NIST OWM and EVFE Subgroup for feedback. The commentor stated a revised proposal will be developed and noted there are significant modifications from the original proposal.
- 2022 Interim: A member of industry representing Electrify America, commented section 3.40 in Handbook 44 was developed before the company was established. A revised proposal is expected to be submitted. Recommends the item remain a developing item.
- 2022 Interim: A member of industry representing EVgo, a joint submitter recommends developing status.

Advisory:

- 2022 Interim: No Comments

Comments Against:

Regulatory:

- 2022 Interim: A regulator from California DMS recommends withdraw, however stated a developmental status is acceptable.
- 2022 Interim: A regulator from New York would like to see a permanent code in the area EVFSs and stated the 10-year exempt period is not acceptable. The commentor stated he is supportive of seeing reasonable changes from the joint submitters.

Industry:

- 2022 Interim: A member of industry representing ChargePoint is not in support of this item and recommends withdraw. He stated the proposal signals to the market things are in flux and supports removal of the proposal and tentative code status. The industry member noted the recent passage of the law providing \$7.8 billion in funding to invest in U.S. EV charging.

Advisory:

- 2021 Interim: Ms. Diane Lee (NIST OWM) noted that the proposal is not clear as written and expressed concerns with an exemption for 10 years.
- 2021 Annual: Ms. Juana Williams (NIST OWM), stated that it was unclear as to the exact type of use that entitles an EVSE to an exemption to NIST HB 44 requirements. Ms. Williams also pointed out that the exemption would allow a generation of devices to operate for 10-years without have to comply with the requirements and could be viewed as competitively unfair to traditional or other alternative vehicle fueling applications.
- 2022 Interim: An advisory member representing NIST OWM stated the current proposal conflicts with the general code for the term retroactive. The representative stated the submitters of the item discussed an alternative proposal with NIST OWM and they are awaiting a final draft of this alternative proposal.

Neutral Comments:

Regulatory:

- 2022 Interim: No Comments

Industry:

- 2022 Interim: No Comments

Advisory: 2022 Interim: No Comments

Item Development:

NCWM 2021 Interim Meeting: The committee assigned Developing status for this item. For more information or to provide comment, please contact:

Ms. Francesca Wahl
Tesla
650-435-0422, fwahl@tesla.com

The Committee suggests that the submitters of this item consider the responses to the proposal from the regional meetings, NIST, OWM and EVFS work group and update the item under consideration to address the comments and as necessary prepare a revised proposal for the EVFS work group to address the concerns with this item.

NCWM 2022 Interim Meeting: The Committee maintained developing status for this item. The Committee suggests the submitters take into consideration the comments provided during open hearings and prepare a revised draft proposal to NIST OWM, the EVFE Subgroup, etc. to provide a comprehensive proposal to membership.

Regional Associations' Comments:

WWMA 2021 Annual Meeting: Justin Wilson (ChargePoint): in the notes for 2021(Interim) there is an error: the notations are incorrect. They recommend withdraw of this proposal. They think the flexibility should be provided to state officials. Kevin Schnepf (California - DMS): extended exemptions are not appropriate - this is still tentative. This should be withdrawn.

The WWMA S&T Committee recommends this item be Withdrawn. The Committee makes this recommendation based on testimony heard during the open hearings and previous reports including recommendations from other Regions.

SWMA 2021 Annual Meeting: The committee received no comments on this item. This committee recommends this item be Withdrawn due to the item allowing a 10-year exemption.

CWMA 2021 Interim Meeting: Tina Butcher-NIST has not seen a revised proposal from the submitters. Submitters recommend item stay developing.

CWMA S&T Committee recommends item stay developing.

NEWMA 2021 Interim Meeting: Francesca Wahl (Tesla) speaking on behalf of the submitters group of EVSE companies asked for further development as the submitters work with the national work group to develop language that will satisfy regulators in-regards to time frames of implementation dates. Alex Beaton from EV GO supported Francesca's comments and supports a development status. Juana Williams (NIST OWM) commented in-regards to blanket exemptions that release devices from compliance for such an extended period-of-time seemed too long. (see NIST comments on NCWM website)

The NEWMA Specifications and Tolerances Committee recommends that this item remain in Developing Status.

NEWMA Report: EVF-21.1

Regional recommendation to NCWM on item status:

- ☐ Recommend as a Voting Item on the NCWM agenda
- ☐ Recommend as an Information Item on the NCWM agenda
- ☐ Recommend as an Assigned Item on the NCWM agenda
(To be developed by an NCWM Task Group or Subcommittee)
- ☒ Recommend as a Developing Item on the NCWM agenda
(To be developed by source of the proposal)

<input type="checkbox"/> Recommend Withdrawal of the Item from the NCWM agenda <i>(In the case of new proposals, do not forward this item to NCWM)</i> <input type="checkbox"/> No recommendation from the region to NCWM <i>(If this is a new proposal, it will not be forwarded to the national committee by this region)</i>
Comments and justification for the regional recommendation to NCWM: <i>(This will appear in NCWM reports)</i> <p>Ms. Tina Butcher (NIST OWM) commented that this item was originally submitted by a group of manufacturers. The item went to EV-USNWG, received feedback and the submitters have been working to address comments from national and regional levels. Mr. Alex Beaton (EVGo) commented as one of the submitters. He indicated that the submitters heard feedback from regulators regarding the originally proposed 10-year exemption for EV meters and has modified the proposal. For DC meters, the submitters are looking to propose that all meters manufactured prior to 2024 will be subject to 5% accuracy tolerance and those manufactured after 2024 will be subject to a 1% accuracy tolerance. Both percentages for accuracy have been supported by data. For AC meters, Mr. Beaton indicated that prior changes to the proposal have been removed as the submitters believe with calibration, all meters can meet current code. Mr. Beaton believes the updated proposal will be available prior to the 2022 Annual Meeting.</p> <p>After hearing comments from the floor, the committee recognized the need to further develop this item and recommended the item retain developing status. The committee suggested that the submitters to continue to work with regulatory stakeholders and share data in order to further the development of the item, and urges the timely submission of proposals for committee to review prior to annual and interim meetings.</p>

Additional letters, presentation and data may have been submitted for consideration with this item. Please refer to <https://www.ncwm.com/publication-16> to review these documents.

EVF-20.1 V S.1.3.2. EVSE Value of the Smallest Unit.

NOTE: The item under consideration includes editorial changes by the submitter, NIST, OWM, to correctly reflect the appropriate strikeout/underlines when editing existing text in NIST HB 44. NIST OWM included other recommendations for changes to the text in their analysis, but these changes were more than editorial.

Source:

NIST, Office of Weights and Measures

Purpose:

Specify the maximum permissible value of the indicated and/or recorded electrical energy unit by an EVSE. Establish a value for the energy unit of measurement (kilowatt-hour) that is: suitable for all commercial transactions and does not significantly lengthen the time (by a factor of 25) to conduct a test of an EVSE.

Item Under Consideration:

Amend Handbook 44, Electric Vehicle Fueling Systems follows:

S.1.3. EVSE Units.

~~**S.1.3.2. EVSE Value of Smallest Unit.** – The value of the smallest unit of indicated delivery by an EVSE, and recorded delivery if the EVSE is equipped to record, shall not be greater than 0.0005 MJ or 0.0001 kWh.~~
(Amended 2020)

S.1.3.2. EVSE Value of Smallest Unit. – The value of the smallest unit of indicated delivery by an EVSE, and recorded delivery if the EVSE is equipped to record, shall be 0.005 MJ or 0.001 kWh;
(a) for AC and DC systems shall not exceed 0.0005 MJ or 0.0001 kWh; and
(b) the value in electrical energy units in terms of:
(1) the megajoule (MJ) shall be expressed as a decimal multiple or submultiple of 5; or
(2) the kilowatt hour (kWh) shall be expressed as a decimal multiple or submultiple of 1.

1 (Amended 2020)

2 **Background/Discussion:**

3 This item has been assigned to the submitter for further development. For more information or to provide comment,
4 please contact:

5 Ms. Juana Williams
6 NIST, Office of Weights and Measures
7 301-975-3989, juana.williams@nist.gov

8 In 2014 the U.S. National Work Group (USNWG) on Electric Vehicle Fueling and Submetering (EVFS) deliberated
9 about the Electric Vehicle Fueling System's appropriate value for the display of electrical energy when sold in
10 kilowatt-hour units of measurement. Based on the typical EVSE's ratings (i.e., charging power and current) the work
11 group agreed that the value of the indicated or recorded charge should be in increments of 0.001-kilowatt hour (kWh).
12 Members of the work group noted that the value could be inexpensively modified. Most recently it has been
13 determined that the currently specified value of 0.001 kWh for the electricity unit of measurement in relation to the
14 time for a test standard to complete an accuracy test at 10 % of the maximum deliverable amperes increases the length
15 of the test by a factor of 25.

16 Each Handbook 44 code specifies the appropriate unit(s) of measurement (indicated and recorded) that is permitted
17 for all device applications that a code applies to. The accepted SI (metric) unit of measurement for a device application
18 in each code is in most cases followed by its equivalent corresponding recognized U. S. customary unit. Measurements
19 in SI or customary units can be supported through calibrations by an accredited (or recognized) laboratory. Each
20 handbook code also specifies the maximum value for a unit of measurement that can be indicated or recorded by the
21 device for a specific product application or rate of delivery.

22 Unlike the scales' codes, the EVSE code specifies the "smallest" value of the unit that is permitted to be indicated for
23 the quantity of electricity being measured; whereas the scales codes specify the value that the unit *shall be equal to or*
24 *shall not be greater than*. The language in the scales code clearly states that there is only one acceptable value for the
25 unit of measurement or establishes a value that the unit cannot exceed.

26 The measuring devices codes specify that the smallest value for the unit of delivery indicated or recorded for a
27 commodity *shall not exceed* a specific value. The value varies depending on the type of commodity and/or device's
28 flow rate or falls into the category of all other meters. Yet it is clear the unit of measurement's value cannot be
29 exceeded although lesser values are acceptable if the device has that capability, maintains accuracy, and sales in that
30 particular indicated or recorded quantity are appropriate.

31 To provide adequate resolution (i.e., value of the kWh unit) in the EVSE's customer display of the electrical energy
32 transaction information and to facilitate accuracy testing of the system two alternate proposals were developed that
33 recommend somewhat different modifications of paragraph S.1.3.2. EVSE Value of Smallest Unit.

34 The first option for modifying the code that was developed and circulated to the Electric Vehicle Fueling Equipment
35 (EVFE) Subgroup for consideration would be to recognize EVSEs equipped with a customer display of 0.005 MJ or
36 0.001 kWh and a test mode display on the EVSE face, accessible internally, or activated by controls accessed by the
37 official that indicates in 0.0005 MJ or 0.0001 kWh increments.

38 Also, part of the information circulated to the Subgroup included a second option of modifying the value of the
39 displayed and/or recorded kilowatt-hour energy units from 0.005 MJ or 0.001 kWh to a higher resolution of 0.0005
40 MJ or 0.0001 kWh. The first option shown below would modify paragraph S.1.3. EVSE Units to include a new
41 subparagraph S.1.3.3. EVSE Value of Smallest Unit Test Mode to allow for a higher resolution value of the kilowatt-
42 hour indications as a test mode display separate from the display used for the display transaction. The test mode
43 display would either continuously indicate on the face of the dispenser or an internal display accessible during the
44 inspection and test of the dispenser or display the quantity by using controls on the device.

S.1.3. EVSE Units.

S.1.3.3. EVSE Value of Smallest Unit Test Mode. – EVSE shall display the electricity measured for each transaction in 0.0005 MJ or 0.0001 kWh energy units through:

- (a) **a continuous indication on the face of the EVSE;**
- (b) **an internal display accessible during the inspection and test of the EVSE; or**
- (c) **a display of the quantity by using controls on the device.**
- (Added 20XX)**

S.1.3.34. Value Defined. ...
(Amended 2020)

A test display mode is permissible for the mass flow meter compressed natural gas and liquefied natural gas dispenser applications. Although this option was entertained by the USNWG in 2014, further discussion would be needed to provide guidelines on how the indication must operate to comply with handbook requirements. When this option was circulated in 2019 to the USNWG EVFE Subgroup, the interest was more in favor of a single higher resolution display (i.e., 0.0001 kWh). However, there was some concern expressed about potential rounding issues were there to be two separate indications having different display resolution.

Since the 2015 adoption of Handbook 44, Section 3.40 paragraph S.1.3.2. EVSE Value of Smallest Unit has specified that the smallest unit of indicated delivery by an EVSE, and recorded delivery if the EVSE is equipped to record, shall not be greater than 0.005 MJ or 0.001 kWh. It is anticipated that the community would question the cost to modify the equipment's design; however, after discussions about the possible quantity value of "d" as large as 0.1 kWh, industry indicated that the value for the unit of measurement could be inexpensively modified. The EVSE code has tentative status and to date no equipment has undergone the type evaluation process. The community anticipates there will be slight modifications to requirements and test procedures to address various generations of equipment, design configurations, and business models in the marketplace.

NCWM 2020 Interim Meeting: Ms. Tina Butcher (NIST OWM) reported that this item was submitted by NIST OWM to modify the value for "d" specified for Kilowatt-hour for EVSEs to recommend a higher resolution for "d" that does not significantly lengthen the time to conduct the accuracy test of EVSE. Ms. Butcher added that it is uncertain if the item is fully developed and request it be made developing. Mr. Kevin Schnepf (CA) stated California has already made the change, however he supports a Developing status for this item. Mr. Jim Willis (NY) provided similar comments to those of Mr. Schnepf. *NOTE: The NIST OWM analysis includes a recommended that the phrase "shall not be greater than" be removed.*

During the Committee's work session, the committee agreed that this item should be given a Developing status to allow the submitter to continue to work with the work group concerning this item.

NCWM 2021 Annual Meeting: Ms. Juana Williams explained that NIST OWM recommends the community reconsider the original proposed modifications of paragraph S.1.3.2 which do not limit the electrical energy unit to being expressed only as a single fixed numerical value but permit a manufacturer to design a display that measures in a numerical value of 0.0005 MJ or 0.0001 kWh or some other numerical value as long as the chosen value does not exceed those MJ or kWh maximum values specified in paragraph S.1.3.2. Whatever, the quantity unit value it would remain unchangeable during the commercial use of the system or dispenser. Proposed new paragraph S.1.3.X. Expressed Value of EVSE Electrical Energy Unit will clarify the value of the quantity unit shall only be expressed as either decimal multiples or submultiples of the numbers 1, 2, or 5 as shown below.

S.1.3.X. Expressed Value of EVSE Electrical Energy Unit. – The electrical energy unit value shall be a decimal multiple or submultiple of 1, 2, or 5.

The Committee recommended a Developing status for this item.

Comments in Favor:**Regulatory:**

- 2022 Interim Meeting: A regulator from California DMS supports as voting with NIST OWM edits.

Industry:**Advisory:**

- 2022 Interim Meeting: The submitter from NIST OWM commented California, New York, and Ohio are currently testing AC systems and should have resolution to sufficiently test these devices. She added California is currently requiring a 0.0001 kWh and has issued eleven type approvals on these devices with this requirement, noting DC systems are not inspected as this time and there is little data on these systems. The advisory member provided a summary of OWM's written analysis and referred membership to OWM's latest alternate proposals by OWM. She also noted the kWh and MJ value is limited to decimal multiples or submultiples of 1 or 5, respectively, and would allow the option of a maximum unit value indicated to three decimal places for DC EVSEs, but only four decimal places in all cases for AC EVSEs.

Comments Against:**Regulatory:**

- 2022 Interim Meeting: A regulator from New York commented the MMQ should be based on time and not on the number of decimal places or resolution, the time of the test is unchanged. He commented this is not a necessary based on New York State's testing of these units.

Industry:

- 2022 Interim Meeting: A member of Electrify America stated there is no need to assure consistency with California EV code and does not see the importance of the resolution as it does not affect the speed of the test. This issue is more applicable to AC rather than DC.

Advisory:**Neutral Comments:****Regulatory:****Industry:****Advisory:****Item Development:**

The Committee has considered the three options provided by the submitter, NIST OWM. Proposal 1, as it appears in Publication 15 and the two alternative proposals published in NIST OWM's written analysis. The Committee has considered the three proposals and has agreed the item is fully developed and is supported by current AC EVSEs in commercial use. The Committee understands there may be more data available at the time of vote providing additional information on the value of the smallest unit in DC EVSE systems. The Committee agreed with recommendations that Proposal 1, which appeared in the Item Under Consideration in the January 2022 S&T Agenda and shown below, should be further modified to clarify the permissible numerical values for expressing the unit of measurement (i.e., MJ or kWh):

S.1.3. EVSE Units.

S.1.3.2. EVSE Value of Smallest Unit. – The value of the smallest unit of indicated delivery by an EVSE, and recorded delivery if the EVSE is equipped to record, shall not be greater than 0.0005 MJ or 0.0001 kWh.
(Amended 2020)

Committee has assigned a voting status for the item as shown below at the 2022 Annual Meeting. This alternate proposal replaces Proposal 1 in the Item Under Consideration to read as follows:

S.1.3.2. EVSE Value of Smallest Unit. – The value of the smallest unit of indicated delivery by an EVSE, and recorded delivery if the EVSE is equipped to record, shall be 0.005 MJ or 0.001 kWh.;

- 1 **(a) for AC and DC systems shall not exceed 0.0005 MJ or 0.0001 kWh; and**
 2 **(b) the value in electrical energy units in terms of:**
 3 **(1) the megajoule (MJ) shall be expressed as a decimal multiple or submultiple of 5; or**
 4 **(2) the kilowatt hour (kWh) shall be expressed as a decimal multiple or submultiple of 1**

5 **Regional Associations' Comments:**

6 WWMA 2021 Annual Meeting: Kevin Schnepf (California - DMS): Supports this item. This was adopted in
 7 California and helped in time of testing. It would be beneficial to all (less timely). In support. Tina Butcher (NIST
 8 OWM): Echoes what Kevin Schnepf indicated: the proposed change will align with California standards - no
 9 alternative suggestions have been made yet. Move to a vote to get in alignment.

10 The WWMA S&T Committee recommends that this item be assigned a Voting status. The Committee agrees that this
 11 item has merit and is fully developed.

12 SWMA 2021 Annual Meeting: The committee received no comments on this item. This committee recommends the
 13 item move forward as a Voting item.

14 CWMA 2021 Interim Meeting: Diane Lee-NIST and Tina Butcher-NIST recommend this item for voting as it is in
 15 line with California.

16 CWMA S&T Committee recommends this item as a voting item.

17 NEWMA 2021 Interim Meeting: Jim Willis (New York) commented in-regards to the value of the smallest unit. NY
 18 has tested many charging stations that have a resolution to the thousands place and have not experienced any issues
 19 with this. The additional decimal place in New York's opinion is not needed and may place an unneeded requirement
 20 for some companies in the industry. Juana Williams (NIST OWM) commented that the proposed change aligns the
 21 requirement with those already adopted and in use by the California Division of Measurement Standards. This
 22 alignment is needed to ensure consistency in inspection and testing of Electric Vehicle Fueling Systems in both type
 23 evaluation and field inspection and testing. NIST OWM notes that the NIST U.S. National Work Group has discussed
 24 the possibility that additional changes may be needed to this paragraph; however, no specific recommendations have
 25 been suggested to this point and do not appear to be imminent. Thus, to avoid inconsistencies noted above and delays
 26 in inspecting and testing this equipment, the Committee may wish to move this item forward for a vote. Jim Willis
 27 (New York) commented that alignment with California is not a reason to change something that is working as intended.
 28 And that New York does not believe this change is necessary.

29 The NEWMA Specifications and Tolerances Committee recommends that this item move forward as a Voting item.

NEWMA Report: EVF-20.1
Regional recommendation to NCWM on item status: <ul style="list-style-type: none"> <input checked="" type="checkbox"/> Recommend as a Voting Item on the NCWM agenda <input type="checkbox"/> Recommend as an Information Item on the NCWM agenda <input type="checkbox"/> Recommend as an Assigned Item on the NCWM agenda (To be developed by an NCWM Task Group or Subcommittee) <input type="checkbox"/> Recommend as a Developing Item on the NCWM agenda (To be developed by source of the proposal) <input type="checkbox"/> Recommend Withdrawal of the Item from the NCWM agenda (In the case of new proposals, do not forward this item to NCWM) <input type="checkbox"/> No recommendation from the region to NCWM (If this is a new proposal, it will not be forwarded to the national committee by this region)
Comments and justification for the regional recommendation to NCWM: (This will appear in NCWM reports)
Ms. Tina Butcher (NIST OWM) commented that the language in the handbook conflicts with what California DMS was applying in the field. The USNWG is still working on the proposal and may have additional changes by Annual

Meeting. Mr. James Cassidy (MA) commented that due diligence should be made to properly vet any changes to this proposal.

After hearing comments from the floor, the committee recognized agreed to recommend this item retain voting status, however, urges the timely submission of proposals for committee to review prior to annual and interim meetings.

1

2 Additional letters, presentation and data may have been submitted for consideration with this item. Please refer to
3 <https://www.ncwm.com/publication-16> to review these documents.

4 **EVF-21.5 D T.2. Load Test Tolerances.**

5 **Source:**

6 ABB, BTCPower, Electrify America, Edison Electric Institute, EVConnect, EVgo, Greenlots, Rivian, Siemens, Tesla,
7 Tritium

8 **Purpose:**

9 To create separate metering requirements for DC EVSE due to significant technology differences and challenges
10 between AC and DC systems.

11 **Item Under Consideration:**

12 Amend Handbook 44, Electric Vehicle Fueling Systems as follows:

13 **T.2. Load Test Tolerances.**

14 **T.2.1. AC EVSE Load Test Tolerances.** – The tolerances for AC EVSE load tests are:

15 (a) Acceptance Tolerance: 1.0 %; and

16 (b) Maintenance Tolerance: 2.0 %.

17 **T.2.2. DC EVSE Load Test Tolerances.** – **The tolerances for DC EVSE load tests:**

18 (a) **Devices installed prior to January 1, 2033**

19 i. **Acceptance Tolerance: 2.5 %; and**

20 ii. **Maintenance Tolerance: 5.0 %**

21 (b) **Devices installed January 1, 2033 or later**

22 i. **Acceptance Tolerance: 1.0 %; and**

23 ii. **Maintenance Tolerance: 2.0 %**

24 **Previous Action:**

- 25 • 2021: Developing Item

26 **Original Justification:**

27 Proposed changes to the text to differentiate alternating current (AC) EVSE from direct current (DC) EVSE. Metering
28 for DC architected systems is considerably more complicated and in ways that the original drafting of this provision
29 never contemplated. For example, the tentative code when initially written never contemplated 350kW EVSE or liquid

cooled cabling from the charging post to the connector. As such, it is necessary to separate the implementation dates of some of the specifications, tolerances, and other technical requirements. DC metering solutions are still being researched and developed and are not yet commercially available to be integrated into DC chargers at scale and at reasonable cost. While the supply chain for the physical meters themselves is slowly catching up, the metering system in a DC EVSE, particularly high-power DC EVSE that utilize liquid-cooled cables, goes beyond the physical meter itself which is incorporated in the main housing of the EVSE. For example, measurements may also need to be taken at the connector end of the dispenser and software and algorithms must be developed, validated, and integrated into the EVSE system to allow for accurate metering of kWh delivered to the vehicle. Implementing more complex metering systems needed for DCFC requires significant design and manufacturing changes to DC EVSE.

The proposed tolerances account for the fact that these systems are still in development and are untested. The proposed timeline provides the industry with enough time to develop, test, validate, and deploy reliable DC metering system technology. This timeline is also consistent with the timeline approved by the State of California which accounts for the vast majority of the EVSE market. EVSE manufacturers are working diligently to meet the California timeline and are confident that it can be met.

While it is important to ensure that consumers are receiving accurate and transparent information regarding the accuracy of EV charging stations, it is also important that the technology to deliver high accuracy is available and reliable.

There is concern about both the proposed timeline and the accuracy requirement. Some are concerned that the accuracy specification of 2.5% acceptance and 5% maintenance is too high and does not provide sufficient consumer confidence that all charge sessions are equal regardless of provider and station. The proposers would note that this is a new and evolving technology where charging providers place a premium on customer experience as they compete for this growing market. Thus far, customers have not registered complaints about lack of transparency. Some are concerned that the timeline for instituting a metering regime is too far into the future. The proposers acknowledge the few years it will take to have reliable DC metering systems commercially available at scale but are working as quickly as possible to develop and integrate these systems into their chargers. Some are also concerned that the metering requirements have been in a place for several years already and therefore the EVSE community should not need more years to develop solutions. The proposers note that current DC EVSE technology was never contemplated by the existing metering regime and DC technology, particularly high-power DC EVSE, were not in existence at the time the original specifications were set. For example, the first 350kWh EVSE with liquid cooled cables weren't deployed in the US until 2018.

The submitter requested voting status for this item in 2021.

Comments in Favor:

Regulatory:

- 2021 Interim: Recommended Developing status.
- 2022 Interim: A regulator from Nevada supports developing status.

Industry:

- 2021 Interim: Mr. Michael Krauthamer (AFTE) and Mr. Keith Bradley (Electrify America), supported the item and recommended Developing status.
- Annual 2021: The submitters requested to maintain Developing status.
- 2022 Interim: A member of the submitting group recommends the item remain developing. The commentor stated the group will be submitting a revised proposal addressing comments and feedback received.

Advisory:

- 2022 Interim: No comments

Comments Against:

Regulatory:

- 2022 Interim: A regulator from California DMS recommends the item to be withdrawn.

Industry:

- Interim 2021: Mr. Samuel Ferris (CA) recommended a Developing status for this item. Mr. Kevin Miller (Charge Point) recommended that this item be withdrawn and noted that his devices meet the tolerance in NIST HB 44.
- 2022 Interim: A member of industry representing ChargePoint recommends withdraw of this item due to no details of the 2022 alternate proposals recently developed by the submitters.

Advisory:

- 2022 Interim: An advisory member representing NIST OWM reiterated 2021 comments against blanket exemptions and dual tolerances yet awaits the rework of alternate proposals recently developed by the submitters that would be ready to be revisited in future EVFE Subgroup meetings. The member encourages the submitters to work with NIST OWM on the final draft of any proposed changes.

Neutral Comments:**Regulatory:**

- 2022 Interim: No comments

Industry:

- 2022 Interim: No comments

Advisory:

- 2022 Interim: No comments

Item Development:

2021 Interim Meeting: The Committee assigned Developing status for this item. For more information or to provide comment, please contact:

Mr. Asaf Nagler
ABB
202-639-4075, asaf.nagler@us.abb.com

NCWM 2022 Interim Meeting: During the committee work session this item was assigned Developing status. The Committee suggests the submitters take into consideration the comments provided during open hearings. The Committee recommends the submitter work with NIST OWM on the final draft of their 2022 alternate proposal for review and comments.

Regional Associations' Comments:

WWMA 2021 Annual Meeting: Kevin Schnepf (California - DMS): this was adopted in California Regulation. Just this past week (September 23rd, 2021) a complete analysis was done and clearly identified that they can meet the 1% tolerance. Recommends to be withdrawn. Justin Wilson (ChargePoint): Recommend to be withdrawn - equipment can meet tolerance as is. Keith Bradley (Electrify America): there are two questions: 1 - can devices in near term meet the tolerance? They are concerned with: when did this become possible? They are continuing to work on this. They are not urging changes to this item - they are working on it. Wants to leave it in developing status - more work to be done. Kurt Floren (LA County): when equipment is out there that is meeting the standards, this is not the time to roll back.

The WWMA S&T Committee recommends this item be Withdrawn. The Committee makes this recommendation based on testimony heard during the open hearings and previous reports including recommendations from other Regions.

Note: In the voting session, Cadence Matijevich (NV) requested that the recommendation of withdrawal of this item be changed to developing. The Committee reviewed item EVF 21.5 with consideration to the comment heard during the voting session. It is the position of the Committee based on open hearings and regional input to recommend withdraw of the item. The testimony provided during open hearings supported that devices can meet the current tolerances.

The Committee's charge is to recommend a status to the National S&T Committee, this will not eliminate the item from the agenda, it is our recommendation.

SWMA 2021 Annual Meeting: The committee received no comments on this item. This committee recommends this item be Withdrawn because we believe that current tolerances are attainable.

CWMA 2021 Interim Meeting: Diane Lee-NIST noted that there were comments regarding this item on the NCWM website.

CWMA S&T Committee recommends this item be withdrawn.

NEWMA 2021 Interim Meeting: Francesca Wahl (Tesla) representing the submitting group commented and was supported by Alex Beaton (EV GO) in-regards to a study and follow up webex meeting from Argonne National Lab. In-order to follow up on this study, the submitters are asking for a developing status. Juana Williams commented below and comments can also be found on the NCWM website.

1. NIST OWM asks if there are existing devices that can meet the current requirements? If there are, what are the justifications for proposing the relaxing of the tolerances, particularly without a sunset date (i.e., a retroactive date)?
2. From a technical perspective, OWM would be less reluctant to seeing the adoption of a phase-in date that includes an accompanying sunset date (i.e., a retroactive date). OWM asks what concrete issues can be cited by the submitters to counter any opposing arguments for a phase in period for DC systems? It would be important to have statistics on the population of devices not in compliance with requirements as discussion moves forward on this proposal.
3. This is not a typical practice to be done on an unlimited basis. This would be more palatable from both a competitive and enforcement standpoint if there are specific technical issues, that necessitate and justify relaxing tolerances on an industrywide basis. An additional concern is that companies are spending money to comply with the existing NIST HB section 3.40 tentative code yet are competing with a population of existing equipment.
4. NIST OWM also would ask how many devices are out there that would be put into use and competing with AC devices, thus creating a competitive advantage for DC devices?
5. There will be concerns about a dual tolerance structure since the proposal doesn't include a corresponding marking or some other type of information requirement to alert consumers that purchasing electricity from one fueling device does not provide the same accuracy assurance as it does from another fueling device. Bottom line multiple tolerance tiers frustrate value comparisons

The NEWMA Specifications and Tolerances Committee recommends that this item remain in Developing Status.

NEWMA Report: EVF-21.5	
Regional recommendation to NCWM on item status:	
<input type="checkbox"/>	Recommend as a Voting Item on the NCWM agenda
<input type="checkbox"/>	Recommend as an Information Item on the NCWM agenda
<input type="checkbox"/>	Recommend as an Assigned Item on the NCWM agenda (To be developed by an NCWM Task Group or Subcommittee)
<input checked="" type="checkbox"/>	Recommend as a Developing Item on the NCWM agenda (To be developed by source of the proposal)
<input type="checkbox"/>	Recommend Withdrawal of the Item from the NCWM agenda (In the case of new proposals, do not forward this item to NCWM)
<input type="checkbox"/>	No recommendation from the region to NCWM

(If this is a new proposal, it will not be forwarded to the national committee by this region)

Comments and justification for the regional recommendation to NCWM: (This will appear in NCWM reports)

Ms. Tina Butcher (NIST OWM) commented that this item was originally submitted by a group of manufacturers. The item went to EV-USNWG, received feedback and the submitters have been working to address comments from national and regional levels. Mr. Alex Beaton (EVGo) commented as one of the submitters. He indicated that the submitters heard feedback from regulators regarding the originally proposed 10-year exemption for EV meters and has modified the proposal. For DC meters, the submitters are looking to propose that all meters manufactured prior to 2024 will be subject to 5% accuracy tolerance and those manufactured after 2024 will be subject to a 1% accuracy tolerance. Both percentages for accuracy have been supported by data. For AC meters, Mr. Beaton indicated that prior changes to the proposal have been removed as the submitters believe with calibration, all meters can meet current code. Mr. Beaton believes the updated proposal will be available prior to the 2022 Annual Meeting.

After hearing comments from the floor, the committee recognized the need to further develop this item and recommended the item retain developing status. The committee suggested that the submitters to continue to work with regulatory stakeholders and share data in order to further the development of the item and urges the timely submission of proposals for committee to review prior to annual and interim meetings.

Additional letters, presentation and data may have been submitted for consideration with this item. Please refer to <https://www.ncwm.com/publication-16> to review these documents.

TXI – TAXIMETERS

TXI-22.1 V Table S.5. Categories of Device and Methods of Sealing

Source:

NIST, Office of Weights and Measures

Amend Handbook 44, Taximeters Code as follows:

<p>Table S.5. Categories of Device and Methods of Sealing</p>	
Categories of Device	Methods of Sealing
Category 1: No remote configuration capability.	Seal by physical seal or <u>two event counters: one for calibration parameters and one for configuration parameters.</u> for components that may be removed from the vehicle, a combination of physical seals and a physical or electronic link as described in S.5.2. Taximeters Calibrated to Specific Vehicles.

[Nonretroactive as of January 1, 2018]

(Table Added 2017) (Amended 2022)

Previous Action:

New

Original Justification:

Many of the current models of taximeters utilize compact, mobile-type devices (e.g., small compact electronic indicating elements, cellular telephones, computing tablets) that present a challenge based on their physical size to provide appropriate locations for provisions to attach a physical seal. For those devices, provision for applying a

security seal can be accomplished through the use of electronic means (e.g., data change audit trail) however, that option is not currently included.

The current verbiage included in Table S.5. under “Methods of Sealing” for Category 1 devices includes reference to paragraph S.5.2. “Taximeters Calibrated to Specific Vehicles” which recognizes the use of an electronic link to prevent the intentional or inadvertent use of a taximeter in a vehicle that the taximeter was not connected to when the taximeter was calibrated. Taximeters using the mechanical components of the vehicle (e.g., rotation of wheels, transmission) for input in the calculation of distance measurement must maintain those parameter values such as the size and level of inflation of tires for the distance measurement to be accurate. A change of these values can render the calibration of the taximeter inaccurate. This is not a type of sealing that a regulatory official would typically replace if removed/broken and it is believed that the inclusion in this portion of the Taximeters Code was not appropriate. This type of electronic “paring” between the vehicle and the taximeter is sufficiently addressed in S.5.2. and therefore, the reference in Table S.5. is not needed.

The addition of this electronic means for sealing for taximeters will align the language in this code with fifteen other HB 44 specific device codes.

The submitter requested that this be a Voting Item in 2022.

Comments in Favor:

Regulatory:

- 2022 Interim: No Comments

Industry:

- 2022 Interim: No Comments

Advisory:

- 2022 Interim: A representative of NIST OWM commented on recognizing other means for sealing and commented the addition of three parenthetical dates to clarify the enforcement date remains the same, table’s inclusion in the code, and the 2022 amendment to the table to recognize a Category 1 audit trail. The commentor supports a voting status for this item.

Comments Against:

Regulatory:

- 2022 Interim: No Comments

Industry:

- 2022 Interim: No Comments

Advisory:

- 2022 Interim: No Comments

Neutral Comments:

Regulatory:

- 2022 Interim: No Comments

Industry:

- 2022 Interim: No Comments

Advisory:

- 2022 Interim: No Comments

Item Development:

NCWM 2022 Interim Meeting: The Committee agrees the item as having merit and will align this code with other device codes. Based on no opposition and the submitters request for a vote, the committee has assigned a voting status for this item at the 2022 Annual Meeting with the added three parenthetical dates: enforcement date, date of inclusion in the code, and the 2022 amendment.

Regional Associations' Comments:

WWMA 2021 Annual Meeting: Tina Butcher (NIST OWM): They put this forward: the recommended changes are just to clarify what is already in place for audit trails. This is to fill in the blanks for what is considered the minimum for audit trails. This specifies two event counters for the minimum form of an audit trail.

The WWMA S&T Committee recommends that this item be assigned a Voting status. The Committee agrees that this item has merit and is fully developed.

SWMA 2021 Annual Meeting: The committee heard no comments on this item. This committee recommends this item move forward as a Voting item.

CWMA 2021 Interim Meeting: Tina Butcher-NIST recommends that this item move forward to voting. California has this in type evaluation now.

CWMA S&T Committee recommends this item move forward as a voting item.

NEWMA 2021 Interim Meeting: Juana Williams NIST- commented in support and feels the item is fully developed and ready for voting status. Jim Willis (New York) and John McGuire (New Jersey) also supported moving this item forward with a voting status.

The NEWMA Specifications and Tolerances Committee recommends that this item be given a Voting Status.

NEWMA Report: TXI-22.1
<p>Regional recommendation to NCWM on item status:</p> <p> <input checked="" type="checkbox"/> Recommend as a Voting Item on the NCWM agenda <input type="checkbox"/> Recommend as an Information Item on the NCWM agenda <input type="checkbox"/> Recommend as an Assigned Item on the NCWM agenda <i>(To be developed by an NCWM Task Group or Subcommittee)</i> <input type="checkbox"/> Recommend as a Developing Item on the NCWM agenda <i>(To be developed by source of the proposal)</i> <input type="checkbox"/> Recommend Withdrawal of the Item from the NCWM agenda <i>(In the case of new proposals, do not forward this item to NCWM)</i> <input type="checkbox"/> No recommendation from the region to NCWM <i>(If this is a new proposal, it will not be forwarded to the national committee by this region)</i> </p>
<p>Comments and justification for the regional recommendation to NCWM: (This will appear in NCWM reports)</p> <p>Ms. Tina Butcher (NIST OWM) commented that the goal of this item is to get specificity into the handbook regarding the minimum standards for event counter, electronic audit trails, and eliminate reference to prohibit it.</p> <p>After hearing comments from the floor, the committee considered the item to be fully developed and recommended that the item retains voting status.</p>

Additional letters, presentation and data may have been submitted for consideration with this item. Please refer to <https://www.ncwm.com/publication-16> to review these documents.

See Block 3 Items: Tolerances for Distance Testing.

GMA – GRAIN MOISTURE METERS 5.56 (A)

GMA-19.1 D Table T.2.1. Acceptance and Maintenance Tolerances Air Oven Method for All Grains and Oil Seeds.

Source:

NTEP Grain Analyzer Sector

Purpose:

Reduce the tolerances for the air oven reference method.

Item Under Consideration:

Amend Handbook 44, Grain Moisture Meter Code 5.56 (a) as follows:

T.2.1. Air Oven Reference Method. – Maintenance and acceptance tolerances shall be as shown in Table T.2.1. Acceptance and Maintenance Tolerances Air Oven Reference Method. Tolerances are expressed as a fraction of the percent moisture content of the official grain sample, together with a minimum tolerance. (Amended 2001)

Table T.2.1. Acceptance and Maintenance Tolerances Air Oven Reference Method		
Type of Grain, Class, or Seed	Tolerance	Minimum Tolerance
Corn, oats, rice, sorghum, sunflower	0.05 of the percent moisture content	0.8 % in moisture content
All other cereal grains and oil seeds	0.04 of the percent moisture content	0.7 % in moisture content

Table T.2.1. Acceptance and Maintenance Tolerances Air Oven Reference Method for All Grains and Oil Seeds	
<u>Tolerance</u>	<u>Minimum Tolerance</u>
<u>0.03 of the percent moisture content</u>	<u>0.5 % in moisture content</u>

(Amended 2001 and 20XX)

Background/Discussion:

This item has been assigned to the submitter for further development. For more information or to provide comment, please contact:

Mr. Karl Cunningham
Illinois Department of Agriculture
217-785-8301, karl.cunningham@illinois.gov

Samples and list of grains that AMS, FGIS request from states to include in their ongoing calibration program. States and other interested parties wanted to verify that corn samples from their state were included in the calibration data for NTEP meters because of variations states reported between UGMA meter and other meter technologies on corn samples.

During the 2016 Grain Analyzer Sector Meeting, numerous instances of inconsistent moisture meter measurements involving grain shipments from U.S. interior facilities to U.S. export port facilities were reported. The Sector received a suggestion that if the UGMA can make better measurements, then the Sector should consider reducing the applicable tolerances in HB 44. At the 2016 and 2017 Grain Analyzer Sector meetings Mr. Charlie Hurburgh (Iowa State University) agreed to chair a GA Sector Task Group to review the current HB 44 tolerance with both UGMA meters and Non-UGMA meters. During the 2018 meeting Mr. Hurburgh reported that based on data he analyzed from Iowa State Weights and Measures Grain Inspection reports, UGMA meters read closer to the reference air oven moisture results than non-UGMA meters.

It was also noted during the 2018 NTEP Grain Analyzer Sector meeting that the current tolerances were developed in 1991 and have not been changed to coincide with the change in technology for these devices; and this action is needed for grain industry risk management.

Prior to the 2019 NCWM Interim Meeting, all four regional weights and measures associations agreed to forward the proposal as a voting item on the Interim Agenda. However, following the regional meetings, additional data was submitted to the Sector which indicates a need to consider developing different tolerance for some grain types. Through a subsequent ballot, and a majority vote, the Sector agreed to recommend changing the status of the item to developing to provide the Sector time to consider additional data and changes to its original proposal.

NCWM 2019 Interim Meeting: The NCWM S&T Committee heard comments to agenda item GMA-3. Mr. Loren Minnich (KS) commented that he spoke with Ms. Diane Lee (NIST OWM) and she reported that one state was concerned with the application of the reduced tolerances to all grain types, specifically grains with hulls or husks. Mr. Minnich suggested that this item be assigned a “Developing” status to allow for more research into this issue. The committee also received written comments from NIST, OWM (see NIST, OWM Analysis posted on the NCWM Website). During the 2019 Interim Meeting, the S&T Committee considered the comments during the opening hearing and comments submitted prior to the meeting and assigned a “Developing” status for this item.

NCWM 2019 Annual Meeting: Ms. Diane Lee (NIST OWM) provided an update on the history of the item. Ms. Lee noted that the NTEP Grain Analyzer Sector will review data from Arkansas at its 2019 meeting intended to assure that proposed changes to the tolerances can be applied to all grains. Ms. Lee speaking on behalf of the Sector stated that the Developing status assigned to this item is appropriate.

NCWM 2020 Interim Meeting: The Committee heard from Ms. Diane Lee (NIST OWM) who stated that when this item was initially submitted the GMM Sector agreed to reduce tolerance based on data that was limited to corn and soybeans. Following the review of the initial data, additional data from Long Grain Rough Rice was reviewed and the sector agreed that additional data was needed on other grains to include oats, rice, and barley, prior to changing the tolerances. Ms. Lee requested that the item remain developing status as additional data is collected.

During the Committee’s work session, the committee agreed to retain this item as Developing to allow the submitter to continue working with members of the grain analyzer sector to collect additional data.

NCWM 2020 Annual Meeting: Due to the 2020 Covid-19 pandemic, this meeting was adjourned to January 2021, at which time it was held as a virtual meeting. Due to constraint of time, only those items designated as 2020 Voting Items were addressed. All other items were addressed in the subsequent 2021 NCWM Interim Meeting.

NCWM 2021 Annual Meeting: The Committee heard comments from Ms. Diane Lee (NIST OWM) who noted that additional data is needed to assess the proposed tolerances. Ms. Lee requested that this item remain Developing. During the Committee’s work session, the Committee agreed to a Developing status for this item.

NCWM 2022 Interim Meeting: The Committee heard comments from Ms. Diane Lee (NIST OWM) who noted that additional data is needed to assess the proposed tolerances. Ms. Lee added that states would be submitting more data. Ms. Lee requested that this item remain Developing. During the Committee's work session, the Committee agreed to a Developing status for this item.

Regional Associations' Comments:

WWMA 2021 Annual Meeting: Diane Lee (NIST OWM): This item has been on the agenda since 2019 - when it was proposed there was a study done on only corn and soybean samples (maybe we could lower the tolerances) subsequent to that, they received a report from a state to hold off to look at more data from different grain types (rough rice). Agreed to collect additional data, from a few additional states. A memo has gone out to participating states to collect more data on additional grains. They are in the process of collecting and hope to have a report in the interim on validity. Support as a developing item.

The WWMA S&T Committee recommends the status remain developmental.

SWMA 2021 Annual Meeting: The committee heard no comments on this item. This committee recommends this item remain Developing so that more data can be collected and presented in the future.

CWMA 2021 Interim Meeting: Diane Lee-NIST is part of the sector. The sector met in August of this year and four States will be submitting data. Once data is collected, it will be given to the Grain Sector for them to decide what to with the item. Doug Musick-Kansas are there old technology that can meet this requirement? Has any data been submitted regarding this?

CWMA S&T Committee recommends this item as developing.

NEWMA 2021 Interim Meeting: No comments were heard. The NEWMA Specifications and Tolerances Committee recommends that this item remain in Developing Status.

NEWMA Report: GMA-19.1	
Regional recommendation to NCWM on item status:	
<input type="checkbox"/> Recommend as a Voting Item on the NCWM agenda <input type="checkbox"/> Recommend as an Information Item on the NCWM agenda <input type="checkbox"/> Recommend as an Assigned Item on the NCWM agenda <i>(To be developed by an NCWM Task Group or Subcommittee)</i> <input checked="" type="checkbox"/> Recommend as a Developing Item on the NCWM agenda <i>(To be developed by source of the proposal)</i> <input type="checkbox"/> Recommend Withdrawal of the Item from the NCWM agenda <i>(In the case of new proposals, do not forward this item to NCWM)</i> <input type="checkbox"/> No recommendation from the region to NCWM <i>(If this is a new proposal, it will not be forwarded to the national committee by this region)</i>	
Comments and justification for the regional recommendation to NCWM: (This will appear in NCWM reports)	
<p>Ms. Tina Butcher (NIST OWM) commented on background for this item. There had been concerns if the current tolerances were too broad. The grain sector was looking into expanding the data set to include additional grains but there has been significant delay due to pandemic.</p> <p>After hearing comments from the floor, the committee recognized the need to further develop this item and recommended the item retain developing status.</p>	

Additional letters, presentation and data may have been submitted for consideration with this item. Please refer to <https://www.ncwm.com/publication-16> to review these documents.

MDM – MULTIPLE DIMENSION MEASURING DEVICES

MDM-22.1 D S.1.7. Minimum Measurement.

Source:

Parceltool P/L

Purpose:

Exempt mobile tape based MDMD devices from the 12D minimum measurement.

Item Under Consideration:

Amend Handbook 44, Multiple Dimension Measuring Devices Code as follows:

S.1.7. Minimum Measurement. – Except for entries of tare and mobile tape based MDMD devices, the minimum measurement by a device is 12 d. The manufacturer may specify a longer minimum measurement. For multi-interval devices, this applies only to the first measuring range (or segment) of each measurement axis (length, width, and height).
(Amended 2017 and 20XX)

Previous Action:

New

Original Justification:

The 12 d minimum measurement is designed for instruments that use an internal rounding function to round the actual measurement up or down to the nearest value of d before being displayed. For measurement of 12 d, or less, the potential error in the measurement is considered too large and therefore the specification of the 12 d minimum measurement is in place.

Measurements below 12 d are commonplace when using a mobile tape (tape measure) type of device for determining measurements. An accepted practice for this type of device is for the Measurement to be rounded up to the nearest whole unit of measurement (e.g., 1 inch) before being used to calculate any charges.

The submitter requested that this be a Voting Item in 2022.

Comments in Favor:

Regulatory:

-

Industry:

-

Advisory:

-

Comments Against:

Regulatory:

-

Industry:

- Russ Vires (SMA); SMA opposes the item.

Advisory:

-

Neutral Comments:

Regulatory:

- Matt Douglas (California Division of Measurement Standards) suggested that the submitter submit data and work with the MDMD sector to develop the item.

Industry:

-

Advisory:

- Darrel Flocken (NCWM, NTEP); Explained the device they are seeking this change for is a tape measure and they may have misunderstood what they are asking for.
- This was first proposed in 2019 and was withdrawn. There appears to be no new justification.

Item Development:

NCWM 2022 Interim Meeting: During the committee work session, the committee determined that more input was needed from the submitter. This item has been assigned to the submitter for further development. For more information or to provide comment, please contact:

Tony Bauer
Parceltool P/L
+61 439-89-2468, tbauer@cubical.com

Regional Associations' Comments:

WWMA 2021 Annual Meeting: Russell Vires (Mettler Toledo): Mettler is opposed to the change proposed here. No reason to eliminate the minimum measurement.

The WWMA S&T Committee recommends that this item be assigned a Developmental status. The Committee recommends that the submitter provide data to support why the devices are unable to meet the 12-division requirement. The Committee also recommends that the submitter consult the MDMD working group.

SWMA 2021 Annual Meeting: Russ Vires, Mettler Toledo, requested that this item be withdrawn because the justification was invalid.

This committee recommends this item be Withdrawn due to having no justification provided for the change.

CWMA 2021 Interim Meeting: No comments from the floor. CWMA S&T Committee has no recommendation for this item.

NEWMA 2021 Interim Meeting: Rick Harshman (NIST OWM) commented This is a new item and members of NIST OWM's LMDP have not had opportunity to review/consider it. There's little information provided in the background/discussion of this item. If the device has digital indication, by rounding all values up as is specified in the background/discussion, the device would fail to comply with HB 44 paragraph G-S.5.2.2.(c). Lou Sakin (Hopkinton/Northbridge, MA) commented that this item is in-need of further development.

The NEWMA Specifications and Tolerances Committee recommends that this item be given Developing Status.

NEWMA Report: MDM-22.1**Regional recommendation to NCWM on item status:**

- ☐ Recommend as a Voting Item on the NCWM agenda
☐ Recommend as an Information Item on the NCWM agenda
☐ Recommend as an Assigned Item on the NCWM agenda
(To be developed by an NCWM Task Group or Subcommittee)
☒ Recommend as a Developing Item on the NCWM agenda
(To be developed by source of the proposal)
☐ Recommend Withdrawal of the Item from the NCWM agenda
(In the case of new proposals, do not forward this item to NCWM)
☐ No recommendation from the region to NCWM
(If this is a new proposal, it will not be forwarded to the national committee by this region)

Comments and justification for the regional recommendation to NCWM: (This will appear in NCWM reports)

Mr. Russ Vires (SMA) rose to oppose the item. He commented that the justification provided by the submitter does not identify issue that is to be resolved. Mr. Vires suggested that the submitter work with MDM Workgroup for a solution and referenced the workgroup meets in May and will be discussing this proposal.

After hearing comments from the floor, the committee recognized the need to further develop this item and recommended the item retain developing status.

Additional letters, presentation and data may have been submitted for consideration with this item. Please refer to <https://www.ncwm.com/publication-16> to review these documents.

OTH – OTHER ITEMS**OTH-16.1 D Electric Watthour Meters Code under Development****Source:**

NIST, Office of Weights and Measures

Purpose:

- 1) Make the weights and measures community aware of work being done within the NIST U.S. National Work Group (USNWG) on Electric Vehicle Fueling and Submetering to develop proposed requirements for electric watthour meters used in submeter applications in residences and businesses;
- 2) Encourage participation in this work by interested regulatory officials, manufacturers, and users of electric submeters.
- 3) Allow an opportunity for the USNWG to provide regular updates to the S&T Committee and the weights and measures community on the progress of this work;
- 4) Allow the USWNG to vet specific proposals as input is needed.

Item Under Consideration:

This item was added to the NCWM S&T Committee's agenda as a "Developing Item" to allow a forum in which progress of the USNWG can be reported as it develops legal metrology requirements for electric watthour meters and continues work to develop test procedures and test equipment standards.

Ms. Tina Butcher (NIST OWM), Chair of the USNWG on Electric Refueling & Submetering has continued to provide regular updates to the Committee on this work and to encourage input and participation from the weights and measures community since the addition of this item to the Committee's agenda in 2016. See the Committee's 2016 through 2021 Final Reports for details.

The SG is nearing completion of a draft NIST Handbook code for “Non-Utility Electricity-Measuring Systems.” Work continues on a few sections of the draft code; however, the SG would like to begin getting feedback from the weights and measures community on the draft code.

The draft code is available for download at <https://www.ncwm.com/publication-15>.

The Subgroup asks the NCWM S&T Committee to consider (and the regional associations to support) the following.

1. Permitting the item to remain in a Developing status on its agenda to allow for further development and input on the draft Handbook 44 Code.
2. Permitting the SG to post the draft code along with other supporting documents on the NCWM S&T Committee’s web page. Areas under review and development by the SG will be noted in highlighted text.
3. Encouraging weights and measures officials and industry to study the draft code and provide input to the SG, including proposed changes along with rationale for such changes and any indication of support or opposition.

The SG requests comments be submitted to the SG Chair or Technical Advisor by the end of March 2022. The SG will review and address comments, updating the draft code as needed and requesting the NCWM S&T Committee to post updated versions for review as available. The SG will finalize a draft for submission in the 2022-2023 NCWM cycle.

The above approach will allow the SG the opportunity to solicit input and incorporate comments from the weights and measures community on the draft code in advance of proposing it for a vote more broadly.

The Electric Watthour Meter Subgroup (EWH SG) of the USNWG on Electric Vehicle Fueling & Submetering has held multiple in-person and web meetings since the 2017 NCWM Annual Meeting. This SG has held 15 virtual meetings since January 2021 focused on finalizing a draft code on “Non-Utility Electricity-Measuring Systems.”

Those interested in participating in this work are asked to contact SG Chair, Ms. Lisa Warfield, or Technical Advisor, Ms. Tina Butcher. Contact information is included in the “Background” section of this item.

Background/Discussion:

This item has been assigned to the submitter for further development. For more information or to provide comment, please contact:

Electric Vehicle Refueling Subgroup:

Ms. Tina Butcher, Chair
NIST Office of Weights and Measures
301-975-2196, tbutcher@nist.gov
Or
Ms. Juana Williams, Technical Advisor
NIST Office of Weights and Measures
301-975-2196, juana.williams@nist.gov

Electric Watthour Meters Subgroup:

Ms. Lisa Warfield, Chair
NIST Office of Weights and Measures
301-975-3308, lisa.warfield@nist.gov
Or
Ms. Tina Butcher, Technical Advisor
NIST Office of Weights and Measures
301-975-2196, tbutcher@nist.gov

This item was submitted as a Developing item to provide a venue to allow the USNWG to update the weights and measures community on continued work to develop test procedures and test equipment standards within its Electric Vehicle Refueling Subgroup. This item will also serve as a forum in which to report work on the development of a proposed tentative code for electric watthour meters in residential and business locations by the USNWG’s Electric Watthour Meters Subgroup and a placeholder for its eventual submission for consideration by NCWM.

Ms. Tina Butcher (NIST OWM), Chairman of the USNWG on Electric Refueling & Submetering has continued to provide regular updates to the Committee on this work. See the Committee’s 2016 through 2018 Final Reports for details.

NCWM 2018 Interim Meeting: No comments were heard on this item and the Committee agreed to maintain its “Developing” status. The Committee did not take comments during open hearings on Developing items at the 2018 NCWM Annual Meeting and agreed to allow only the submitter of a Developing item (or block of Developing items) to provide an update on the progress made to further develop the item(s) since the 2018 NCWM Interim Meeting. The Committee received an update on this item from Ms. Tina Butcher (NIST OWM), Chair of the USNWG on Electric Refueling & Submetering. See the Committee’s 2018 Final Report for Details.

OWM personnel were unable to attend the 2019 NCWM Interim Meeting due to the Federal Government shutdown in early 2019 due to a lack of appropriations; however, OWM provided written comments to the Committee on this item in the advance of the meeting, including the following update on this item:

- The Electric Watthour Meter Subgroup (EWH SG) of the USNWG on Electric Vehicle Fueling & Submetering has held multiple in-person and web meetings since the 2017 NCWM Annual Meeting.
- The SG met in September 2017, November 2017, May 2018, and August 2018. All meetings included web-conferencing to allow those not able to attend in person to participate.
- The SG developed a proposed addition to NIST Handbook 130’s Uniform Regulation for the Method of Sale (MOS) of Commodities (see Item MOS-8 on the L&R Committee’s Agenda) to specify a method of sale for electrical energy sold through these systems and submitted the proposal to the four regional weights and measures association meetings in Fall 2018.
 - Three of the four regions recommend the MOS proposal on the L&R Agenda as a voting item, with the fourth abstaining due to lack of experience with these systems within the region.
- The SG continues work on a proposed code for EWH-type meters for NIST Handbook 44 and expects to have a draft ready for the 2020 NCWM cycle.
- OWM requests this item be maintained on the S&T Committee’s agenda as a Developing Item while the SG finalizes its proposed HB 44 draft. OWM will continue to apprise the Committee of progress.
- At their Fall 2018 meetings, all four regional associations indicated support for maintaining this as a Developing item on the Committee’s agenda.
- The SG will hold its next in-person meeting in February 2019 in Sacramento, CA. *(Technical Advisor’s Note: This meeting was rescheduled to April 2019.)*
- Those interested in participating in this work are asked to contact SG Chair, Ms. Lisa Warfield, or Technical Advisor, Ms. Tina Butcher.

NCWM 2019 Interim Meeting: The Committee heard no comments on this item. At its work session, Committee members agreed with the submitter and the Regional Associations that this item should be assigned a Developing status.

NCWM 2019 Annual Meeting: Ms. Tina Butcher (NIST OWM) provided the Committee with an update on the further development of this item. Ms. Butcher reported that the EWH SG will meet next in August 2019 to continue its work and requested this item remain on the S&T Committee agenda as a Developing item. During the committee’s work session, the Committee agreed with the submitter to retain this item in a Developing status.

NCWM 2020 Interim Meeting: The Committee heard from Ms. Butcher who provided an update on developments in the Electric Watthour Meters Code which is also included in the NIST OWM analysis. Ms. Butcher requested that this item be given a developing status.

During the Committee work session, the committee agreed that this item should be given a Developing status.

NCWM 2020 Annual Meeting: Due to the 2020 Covid-19 pandemic, this meeting was adjourned to January 2021, at which time it was held as a virtual meeting. Due to constraint of time, only those items designated as 2020 Voting Items were addressed. All other items were addressed in the subsequent 2021 NCWM Interim Meeting.

NCWM 2021 Interim Meeting: The Committee heard from Ms. Tina Butcher who provided an update on the developments in the Electric Watthour Code which is include in the NIST OWM analysis and Ms. Butcher requested that this item be given a developing status. The Committee agreed that the item be given a Developing status.

NCWM 2021 Annual Meeting: Ms. Tina Butcher (NIST OWM) provided an update on the developments in the Electric Watthour Code which is included in the NIST OWM analysis. Ms. Butcher noted that the Electric Watthour Code is in Development and anticipates a Code by Fall 2021. There was discussion on definitions for electric master meters and possibly separating the definitions for gas and water master meters and Ms. Butcher requested that this item be given a developing status. The Committee agreed that the item be given a Developing status.

NCWM 2022 Interim Meeting: Matt Douglas (California – DMS) stated that California supports the development of this item but has concerns about identity marking requirements being on a separate document. Also that the devices should be easy to test before and after instillation. This device should allow for electronic data logger. Juana Williams (NIST) commented that the subgroup had provided a draft code that is on the website. Ms. Williams requested comments be submitted to Tina Butcher (NIST) or Lisa Warfield (NIST) by March 22, 2022. Ms. Williams stated these comments will be used to provide and updated draft for the 2022-2023 submission cycle and the item remain in developing status. The Committee agreed that the item be given a Developing status.

Regional Associations' Comments:

WWMA 2021 Annual Meeting: Matt Douglas (California - DMS): California supports further development of this item. Concerns about the identity marking information which allows a separate document to satisfy model and serial number prefixes and doesn't clarify what constitutes a separate document other than hard or electronic and does not originate from the system. We strongly feel that testing capabilities should be easily and readily achievable before and after the installation as well as means for verifying validity of complaints based on inaccuracy. An observation – as written the method of sealing category II and III requires a hard copy of audit trail and event logger information. Other codes are being considered to allow electronic forms of this information.

The WWMA S&T Committee recommends this item remain in a Developing status. The Committee acknowledged that, as referenced in the Committee's agenda, the submitter of the item has asked the item to remain in a Developing status to allow for further refinement and input on the draft NIST HB 44 code. Based upon this information and the comments received during its open hearings, the Committee encourages the NIST USNWG Subgroup to consider the comments provided by CA DMS at the WWMA meeting. The Committee also encourages others in the weights and measures community to continue studying the draft code and provide input to the Subgroup as requested in the agenda item.

SWMA 2021 Annual Meeting: The committee heard no comments on this item. This committee recommends this item remain Developing so that more work can continue at the request of the submitter.

CWMA 2021 Interim Meeting: Tina Butcher-NIST item has been on the agenda for 5 years. Needs a little more work from subcommittee. She recommended item as developing and would like public comments.

CWMA S&T Committee recommends the item as a developing item.

NEWMA 2021 Interim Meeting: Juana Williams (NIST OWM) commented below and recommended developing status.

- NIST OWM notes that the USNWG Subgroup on Watthour-Type Electric (EWH) Meters is nearing completion of its proposed tentative code for utility-type watthour submeters
- As noted in the agenda, there are a few sections of the draft code that require additional work by the EWH Subgroup.
 - NIST OWM asks that the item remain in a Developing status while the Subgroup completes these remaining items.

- The Subgroup is asking for feedback on the remaining portions of the draft code thus far.
 - The NCWM S&T Committee has agreed to post the draft on the S&T's website to allow for broader review and comment.
 - NIST OWM encourages review and input on the draft.
 - This input will allow the Subgroup to begin incorporating feedback from the community and better prepare the draft for submission in the 2022-2023 cycle.

The NEWMA Specifications and Tolerances Committee recommends that this item be given Developing Status.

NEWMA Report: OTH-16.1
Regional recommendation to NCWM on item status: <ul style="list-style-type: none"> <input type="checkbox"/> Recommend as a Voting Item on the NCWM agenda <input type="checkbox"/> Recommend as an Information Item on the NCWM agenda <input type="checkbox"/> Recommend as an Assigned Item on the NCWM agenda (To be developed by an NCWM Task Group or Subcommittee) <input checked="" type="checkbox"/> Recommend as a Developing Item on the NCWM agenda (To be developed by source of the proposal) <input type="checkbox"/> Recommend Withdrawal of the Item from the NCWM agenda (In the case of new proposals, do not forward this item to NCWM) <input type="checkbox"/> No recommendation from the region to NCWM (If this is a new proposal, it will not be forwarded to the national committee by this region)
Comments and justification for the regional recommendation to NCWM: (This will appear in NCWM reports)
<p>Ms. Tina Butcher (NIST OWM) commented that this item pertains to electric submeters. The workgroup is still working on the proposal and has prepared a draft, however, 3-4 items need to be resolved with criteria for marking and testing.</p> <p>After hearing comments from the floor, the committee recognized the need to further develop this item and recommended the item retain developing status.</p>

Additional letters, presentation and data may have been submitted for consideration with this item. Please refer to <https://www.ncwm.com/publication-16> to review these documents.

OTH-22.1 D Appendix A: Fundamental Considerations, 3. Testing Apparatus

This item was modified and combined with Item GEN-19.1 and resides in Block 8.

OTH-22.2 V Appendix D – Definitions: face

Source:

NIST, Office of Weights and Measures

Purpose:

To correct the apparent oversight of *not* referencing the codes that clearly make use of the term “face”; include the missing code section numerical designations of 3.32, 3.37, and 3.39 in the [brackets] following the second meaning definition of the term “face” in NIST Handbook 44 Appendix D. The inclusion of those specific device code designations will clarify the term is applicable to retail devices addressed in the LPG and Anhydrous Ammonia Liquid-Measuring Devices, Mass Flow Meters (MFM), and Hydrogen Gas-Measuring Devices Codes, respectively. The term has special meaning for these types of systems because the “face” of these retail devices is specified as the only permissible location for specific quantity, pricing, and related marking information that provide clarity about the correct computation of each sale by the dispensing system.

Item Under Consideration:

Amend Handbook 44, Appendix D – Definitions as follows:

face. – That portion of a computing-type pump or dispenser which displays the actual computation of price per unit, delivered quantity, and total sale price. In the case of some electronic displays, this may not be an integral part of the pump or dispenser. [3.30, **3.32, 3.37, and 3.39**]
(Added 1987) (**Amended 2022**)

Previous Action:

New

Original Justification:

Multiple permanent measuring device code sections in NIST Handbook (HB) 44 specify that either the initial zero condition, the display of the unit price, or other marking information shall be posted or displayed on either the face or each “face” of the dispenser. Currently only the Liquid-Measuring Devices code’s numerical designation (i.e., 3.30) is referenced in the NIST HB 44 Appendix D definition of the term “face.” The term also has special meaning for three other types of measuring devices/systems (i.e., LPG, MFM [e.g., CNG and LNG], and gaseous hydrogen) yet those code’s numerical designations are not shown in the [brackets] following the definition.

This proposal is a housekeeping item intended to correct the omission of multiple numerical designations of applicable code sections from the definition of the term “face.” Those codes’ numerical designations should have appeared in the definition at the same time as the term “face” was first recognized in each codes’ display and posting requirements. Correcting this oversight can be accomplished by including in this distinct term references to all applicable handbook codes sections. The proposed modification of the definition provides the missing reference to a special term that clarifies the intended placement of essential transaction information on the device. This has benefits for the equipment manufacturer designing the device, but also ensures clear and easy access and use of the information by both the buyer and seller.

The wording of the current definition may seem a bit archaic; on the other hand, its scope remains broad enough to recognize both customary transaction information as well as the more recent use of nontraditional application-specific computational information such as supplemental fuel conversion units or instances where there is the option for use of either a built-in or remote primary display.

The 15 relevant handbook code paragraphs that include requirements for specific information to be either indicated, displayed, posted, or automatically shown on the “face” of device types other than retail liquid measuring devices (i.e., code section 3.30) are listed below. Since the definition of “face” is applicable to these specific device types a modification of the handbook definition of the term “face” is warranted to include three additional device-specific code designations in the definition. Those 15 paragraphs are provided in their entirety in an *attachment* to this proposal (the text was excerpted from the 2020 edition of NIST Handbook 44). This detailed information was provided to assist the community in its review and consideration of the proposal for expanding the codes referenced in the definition of “face” from one to four sections. The applicable code paragraphs with requirements for either displaying or posting the initial zero condition, display of the unit price and quantity, and/or other marking information on the “face” of the retail device/dispenser are:

3.32 LPG and Anhydrous Ammonia Liquid-Measuring Devices Code paragraphs:

S.1.4.1. Indication of Delivery; For Retail Devices Only

S.1.5.1. Display of Unit Price and Product Identity

UR.2.7.1. Unit Price and Product Identity

3.37. Mass Flow Meters Code paragraphs:

S.2.5.1. Unit Price

S.2.6.2. Display of Quantity and Total Price

S.2.8. Indication of Delivery

S.5.2. Marking of Equivalent Conversion Factors for Compressed Natural Gas

- 1 S.5.3. Marking of Equivalent Conversion Factor for Liquefied Natural Gas
- 2 UR.3.1. Unit Price and Product Identity for Retail Dispensers.
- 3 UR.3.1.1. Marking of Equivalent Conversion Factors for Compressed Natural Gas
- 4 UR.3.1.2. Marking of Equivalent Conversion Factor for Liquefied Natural Gas
- 5 3.39 Hydrogen Gas-Measuring Devices Code paragraphs:
- 6 S.2.4.1. Unit Price
- 7 S.2.5.2. Display of Quantity and Total Price
- 8 S.2.7. Indication of Delivery
- 9 UR.3.1. Unit Price and Product Identity for Retail Dispensers

The submitter requested that this be a Voting Item in 2022.

Comments in Favor:

Regulatory:

-

Industry:

-

Advisory:

- Juana Williams (NIST) explained that this is essentially a housekeeping item to correct the definition of “face” to add code numbers 3.32, 3.37, 3.39.

Comments Against:

Regulatory:

-

Industry:

-

Advisory:

-

Neutral Comments:

Regulatory:

-

Industry:

-

Advisory:

-

Item Development:

NCWM 2022 Interim Meeting: Based on no comments in opposition and the submitters request for a voting status, the committee recommends that this item be voted on at the annual meeting.

Regional Associations' Comments:

WWMA 2021 Annual Meeting: Matt Douglas (California - DMS): This item seems to be housekeeping. CA DMS supports this code.

The WWMA S&T Committee recommends that this item be assigned a Voting status. The Committee agrees that this item has merit and is fully developed.

SWMA 2021 Annual Meeting: The committee heard no comments on this item. This committee recommends moving this forward as a Voting item.

CWMA 2021 Interim Meeting: Tina Butcher-NIST item is cleaned up and ready to move forward as a voting item.

CWMA S&T Committee recommends this item move forward as a voting item.

NEWMA 2021 Interim Meeting: Juana Williams (NIST OWM) commented that this is a house keeping item and recommends moving forward as a voting item. Jim Willis (New York) also supports giving this item voting status.

The NEWMA Specifications and Tolerances Committee recommends that this item be moved forward with a Voting Status.

NEWMA Report: OTH-22.2
Regional recommendation to NCWM on item status: <ul style="list-style-type: none"> <input type="checkbox"/> Recommend as a Voting Item on the NCWM agenda <input type="checkbox"/> Recommend as an Information Item on the NCWM agenda <input type="checkbox"/> Recommend as an Assigned Item on the NCWM agenda (To be developed by an NCWM Task Group or Subcommittee) <input type="checkbox"/> Recommend as a Developing Item on the NCWM agenda (To be developed by source of the proposal) <input type="checkbox"/> Recommend Withdrawal of the Item from the NCWM agenda (In the case of new proposals, do not forward this item to NCWM) <input checked="" type="checkbox"/> No recommendation from the region to NCWM (If this is a new proposal, it will not be forwarded to the national committee by this region)
Comments and justification for the regional recommendation to NCWM: (This will appear in NCWM reports)
No comments were heard from the body on this item.

Additional letters, presentation and data may have been submitted for consideration with this item. Please refer to <https://www.ncwm.com/publication-16> to review these documents.

ITEM BLOCK 1 (B1) TERMINOLOGY FOR TESTING STANDARDS

NOTE: During the 2019 NCWM Interim Meeting, the S&T Committee considered comments during Opening Hearings and recommended that the following Items appearing on the 2019 Agenda as GEN-3, B1, B2, LPG-3 and MFM-5 be combined and gave these items an Assigned status. Item Block 1 included previously numbered items: GEN-3; Block 1; Block 2; LPG-3; and MFM-5.

NOTE: Based on comment heard during the 2021 Annual Meeting, the S&T Committee recommended that all items that were combined with Block 1 "Terminology For Testing Standards" and originally appeared as a separate item or separate block of items on the S&T agenda prior to 2019, be removed from Block 1 and appear as originally presented. As such, the items presented in this block are the original items included in Block 1 "Terminology For Testing Standards".

Source:

NIST, Office of Weights and Measures

Purpose:

To remove the current limited definition and use of the term “Transfer Standard” and eliminate terms “Testing Standards”, “Verification (Testing) Standards”, and instead use the term Field Standard, consistent with its reference in Handbook 44, Appendix A, Fundamental Considerations and its use in several sections of Handbook 44. To correct the broad use of the term Transfer Standard and instead replace its use with the term Field Standard. To update all use of the term “standard” to use the term “Field Standard”. To remove the current limited definition of Transfer Standard and instead use the term Field Standard.

B1: SCL-18.1 W N.2. Verification (Testing) Standards**Item Under Consideration:**

Amend Handbook 44, Scales Code as follows:

N.2. Verification (Testing) Field Standards. – Field standard weights used in verifying weighing devices shall comply with requirements of NIST Handbook 105-Series standards (or other suitable and designated standards) or the tolerances expressed in Fundamental Considerations, paragraph 3.2. (i.e., one-third of the smallest tolerance applied).

(Amended 1986 and 20XX)

B1: ABW-18.1 W N.2. Verification (Testing) Standards**Item Under Consideration:**

Amend Handbook 44, Automatic Bulk Weighing Systems Code as follows:

N.2. Verification (Testing) Field Standards. – ~~Field S~~Field standard weights and masses used in verifying weighing devices shall comply with requirements of NIST Handbook 105-1 (Class F) or the tolerances expressed in Appendix A, Fundamental Considerations, paragraph 3.2. (i.e., one-third of the smallest tolerance applied).

(Amended 20XX)

B1: AWS-18.1 W N.1.3. Verification (Testing) Standards, N.3.1. Official Tests, UR.4. Testing Standards**Item Under Consideration:**

Amend Handbook 44, Automatic Weighing Systems Code as follows:

N.1.3. Verification (Testing) Field Standards. – Field standard weights shall comply with requirements of NIST Handbook 105-1, “Specifications and Tolerances for Field Standard Weights (Class F)” or the tolerances expressed in Fundamental Considerations, paragraph 3.2. (i.e., one-third of the smallest tolerance applied).

(Amended 20XX)

N.3.1. Official Tests. – Officials are encouraged to periodically witness the required “in house” verification of accuracy. Officials may also conduct official tests using the on-site ~~testing-field~~ standards or other appropriate standards belonging to the jurisdiction with statutory authority over the device or system.

(Amended 20XX)

UR.4. ~~Testing-Field~~ Standards. – The user of a commercial device shall make available to the official with statutory authority over the device ~~testing-field~~ standards that meet the tolerance expressed in Fundamental Considerations, paragraph 3.2. Tolerances for Standards (i.e., one-third of the smallest tolerance applied). The

accuracy of the ~~testing field~~ standards shall be verified annually or on a frequency as required by the official with statutory authority and shall be traceable to the appropriate SI standard.

(Amended 20XX)

B1: CLM-18.1 W N.3.2. Transfer Standard Test and T.3. On Tests Using Transfer Standards

Item Under Consideration:

Amend Handbook 44, Cryogenic Liquid-Measuring Devices Code as follows:

N.3.2. ~~Transfer Field~~ Standard Test. – When comparing a meter with a calibrated ~~transfer field~~ standard, the test draft shall be equal to at least the amount delivered by the device in two minutes at its maximum discharge rate, and shall in no case be less than 180 L (50 gal) or equivalent thereof. When testing uncompensated volumetric meters in a continuous recycle mode, appropriate corrections shall be applied if product conditions are abnormally affected by this test mode.

(Amended 1976 and 20XX)

~~**T.3. On Tests Using Transfer Standards.**—To the basic tolerance values that would otherwise be applied, there shall be added an amount equal to two times the standard deviation of the applicable transfer standard when compared to a basic reference standard. (Added 1976)~~

B1: CDL-18.1 W N.3.2. Transfer Standard Test, T.3. On Tests Using Transfer Standards

Item Under Consideration:

Amend Handbook 44, Carbon Dioxide Liquid-Measuring Devices Code as follows:

N.3.2. ~~Transfer Field~~ Standard Test. – When comparing a meter with a calibrated ~~transfer field~~ standard, the test draft shall be equal to at least the amount delivered by the device in two minutes at its maximum discharge rate.

(Amended 20XX)

~~**T.3. On Tests Using Transfer Standards.**—To the basic tolerance values that would otherwise be applied, there shall be added an amount equal to two times the standard deviation of the applicable transfer standard when compared to a basic reference standard.~~

B1: HGM-18.1 W N.4.1. Master Meter (Transfer) Standard Test, T.4. Tolerance Application on Test Using Transfer Standard Test Method

Item Under Consideration:

Amend Handbook 44, Hydrogen Gas-Measuring Devices Tentative Code as follows:

N.4.1. Master Meter (~~Transfer~~) Field Standard Test. – When comparing a measuring system with a calibrated ~~transfer field~~ standard, the minimum test shall be one test draft at the declared minimum measured quantity and one test draft at approximately ten times the minimum measured quantity or 1 kg, whichever is greater. More tests may be performed over the range of normal quantities dispensed.

(Amended 2021XX)

~~**T.4. Tolerance Application on Test Using Transfer Standard Test Method.**—To the basic tolerance values that would otherwise be applied, there shall be added an amount equal to two times the standard deviation of the applicable transfer standard when compared to a basic reference standard.~~

B1: GMA-18.1 W 5.56(a): N.1.1. Air Oven Reference Method Transfer Standards, N.1.3. Meter to Like-Type Meter Method Transfer Standards and 5.56(b): N.1.1. Transfer Standards, T. Tolerances¹

Item Under Consideration:

Amend Handbook 44, Grain Moisture Meters Code as follows:

5.56.(a) Grain Moisture Meters

N.1.1. Air Oven Reference Method ~~Transfer-Field~~ Standards. – Official grain samples shall be used as the official ~~transfer field~~ standards with moisture content and test weight per bushel values assigned by the reference methods. The reference methods for moisture shall be the oven drying methods as specified by the USDA GIPSA. The test weight per bushel value assigned to a test weight transfer standard shall be the average of 10 test weight per bushel determinations using the quart kettle test weight per bushel apparatus as specified by the USDA GIPSA. Tolerances shall be applied to the average of at least three measurements on each official grain sample. Official grain samples shall be clean and naturally moist, but not tempered (i.e., water not added).
(Amended 1992, 2001, ~~and 2003~~, and 20XX)

N.1.3. Meter to Like-Type Meter Method Transfer Standards. – Properly standardized reference meters using National Type Evaluation Program approved calibrations shall be used as ~~transfer field~~ standards. A reference meter shall be of the same type as the meter under test. Tests shall be conducted side-by-side using, as a comparison medium, grain samples that are clean and naturally moist, but not tempered (i.e., water not added).
(Added 2001) (Amended 20XX)

5.56.(b) Grain Moisture Meters

N.1.1. ~~Transfer Field~~ Standards. – Official grain samples shall be used as the official ~~transfer field~~ standards with moisture content values assigned by the reference methods. The reference methods shall be the oven drying methods as specified by the USDA GIPSA. Tolerances shall be applied to the average of at least three measurements on each official grain sample. Official grain samples shall be clean and naturally moist, but not tempered (i.e., water not added).
(Amended 1992 and 20XX)

T. Tolerances¹

¹These tolerances do not apply to tests in which grain moisture meters are the ~~transfer field~~ standards.
(Amended 20XX)

B1: LVS-18.1 W N.2. Testing Standards

Item Under Consideration:

Amend Handbook 44, Electronic Livestock, Meat and Poultry Evaluation Systems and/or Devices Code as follows:

N.2. ~~Testing-Field~~ Standards. – ASTM Standard F2343 requires device or system users to maintain accurate ~~reference-field~~ standards that meet the tolerance expressed in NIST Handbook 44 Fundamental Considerations, paragraph 3.2. Tolerances for Standards (i.e., one-third of the smallest tolerance applied).
(Amended 20XX)

B1: OTH-18.1 W Appendix A: Fundamental Considerations, 3.2. Tolerances for Standards, 3.3. Accuracy of Standards

Item Under Consideration:

Amend Handbook 44, Appendix A: Fundamental Considerations as follows:

3.2. Tolerances for Field Standards. – Except for work of relatively high precision, it is recommended that the accuracy of standards used in testing commercial weighing and measuring equipment be established and maintained so that the use of corrections is not necessary. When the standard is used without correction, its combined error and uncertainty must be less than one-third of the applicable device tolerance.

Device testing is complicated to some degree when corrections to standards are applied. When using a correction for a standard, the uncertainty associated with the corrected value must be less than one-third of the applicable device tolerance. The reason for this requirement is to give the device being tested as nearly as practicable the full benefit of its own tolerance.

(Amended 20XX)

3.3. Accuracy of Field Standards. – Prior to the official use of testing apparatus, its accuracy should invariably be verified. Field standards should be calibrated as often as circumstances require. By their nature, metal volumetric field standards are more susceptible to damage in handling than are standards of some other types. A field standard should be calibrated whenever damage is known or suspected to have occurred or significant repairs have been made. In addition, field standards, particularly volumetric standards, should be calibrated with sufficient frequency to affirm their continued accuracy, so that the official may always be in an unassailable position with respect to the accuracy of his testing apparatus. Secondary field standards, such as special fabric testing tapes, should be verified much more frequently than such basic standards as steel tapes or volumetric provers to demonstrate their constancy of value or performance.

Accurate and dependable results cannot be obtained with faulty or inadequate field standards. If either the service person or official is poorly equipped, their results cannot be expected to check consistently. Disagreements can be avoided, and the servicing of commercial equipment can be expedited and improved if service persons and officials give equal attention to the adequacy and maintenance of their testing

(Amended 20XX)

B1: OTH-18.2 W Appendix D – Definitions: fifth-wheel, official grain samples, transfer standard and Standard, Field

Item Under Consideration:

Amend Handbook 44, Appendix A: Fundamental Considerations as follows:

fifth wheel. – A commercially-available distance-measuring device which, after calibration, is recommended for use as a field ~~transfer~~ standard for testing the accuracy of taximeters and odometers on rented vehicles. [5.53, 5.54]

(Amended 20XX)

official grain samples. – Grain or seed used by the official as the official ~~transfer field~~ standard from the reference standard method to test the accuracy and precision of grain moisture meters. [5.56(a), 5.56(b)]

(Amended 20XX)

~~**transfer standard.** – A measurement system designed for use in proving and testing cryogenic liquid measuring devices. [3.38]~~

Standard, Field. – A physical standard that meets specifications and tolerances in NIST Handbook 105-series standards (or other suitable and designated standards) and is traceable to the reference or working standards

through comparisons, using acceptable laboratory procedures, and used in conjunction with commercial weighing and measuring equipment.

(Added 20XX)

Background and Discussion:

The term transfer standard is currently defined in HB 44 as only being applicable to the Cryogenic Liquid Measuring Devices Code. This definition should be removed as it is very limited in scope and the item termed a ‘transfer standard’ is in fact a robust working measurement standard used in field conditions, better termed and shortened to Field Standard. All instruments/devices used as a Field Standard in the testing of Weighing and Measuring Devices, regardless of nomenclature, must comply with the requirements of HB 44, Appendix A, Fundamental Considerations Associated with the Enforcement of Handbook 44 Codes, paragraph 3.2 Testing Apparatus, Adequacy. Using the term transfer standard as it is recently being applied in no way negates this requirement of adequacy and confuses the user as to the nature of the field standard being used.

Use of the single word ‘standard’ to signify use of a field standard can be confusing as there are a number of different meanings associated with ‘standard’. It could be a documentary standard, i.e., HB 44; a primary standard used to realize the SI, i.e., Watt Balance; a laboratory reference standard used to ensure traceability of laboratory measurements to the SI, i.e., NIST calibrated laboratory standards; a laboratory check standard used to monitor the laboratory process. Use of the single word ‘standard’ requires that the reader understand completely the context of its use. Instead using the term Field Standard ensures that the reader understands that the item described is a robust working standard used in field conditions to ensure traceability of the subordinate measurements to the SI and leaves no ambiguity in its meaning.

Thus, the recommended changes to HB 44 align that document with the HB 130, removing ambiguity and adding clarity to the use of Field Standards for device testing.

Handbook 130 does NOT contain the term transfer standard in any location and already contains the definition and appropriate use of the term Field Standard in the following locations:

1.12. Standard, Field. – A physical standard that meets specifications and tolerances in NIST Handbook 105-series standards (or other suitable and designated standards) and is traceable to the reference or working standards through comparisons, using acceptable laboratory procedures, and used in conjunction with commercial weighing and measuring equipment. (Added 2005)

Uniform Weights and Measures Law

Section 3. Physical Standards

Weights and measures that are traceable to the U.S. prototype standards supplied by the Federal Government, or approved as being satisfactory by NIST, shall be the state reference and working standards of weights and measures, and shall be maintained in such calibration as prescribed by the NIST as demonstrated through laboratory accreditation or recognition. All field standards may be prescribed by the Director and shall be verified upon their initial receipt and as often thereafter as deemed necessary by the Director. (Amended 2005)

Section 12. Powers and Duties of the Director

The Director shall:

...

(h) verify the field standards for weights and measures used by any jurisdiction within the state, before being put into service, tested annually or as often thereafter as deemed necessary by the Director based on statistically evaluated data, and approve the same when found to be correct; (Amended 2005)

Uniform Regulation for the Voluntary Registration of Servicepersons and Service Agencies for Commercial Weighing and Measuring Devices

Section 1. Policy

For the benefit of the users, manufacturers, and distributors of commercial weighing and measuring devices, it shall be the policy of the Director of Weights and Measures, hereinafter referred to as “Director,” to accept registration of (a) an individual and (b) an agency providing acceptable evidence that he, she, or it is fully qualified by training or experience to install, service, repair, or recondition a commercial weighing or measuring device; has a thorough working knowledge of all appropriate weights and measures laws, orders, rules, and regulations; and has possession of, or has available for use, and will use suitable and calibrated weights and measures field standards and testing equipment appropriate in design and adequate in amount. (An employee of the government shall not be eligible for registration.)

The Director will check the qualifications of each applicant. It will be necessary for an applicant to have available sufficient field standards and equipment (see Section 5, Minimum Equipment).

Section 9. Examination and Calibration or Certification of Standards and Testing Equipment All field standards that are used for servicing and testing weights and measures devices for which competence is registered shall be submitted to the Director for initial and subsequent verification and calibration at intervals determined by the Director. A registered serviceperson or registered service agency shall not use in servicing commercial weighing or measuring devices any field standards or testing equipment that have not been calibrated or verified by the Director. In lieu of submission of physical standards, the Director may accept calibration and/or verification reports from any laboratory that is formally accredited or recognized. The Director shall maintain a list of organizations from which the state will accept calibration reports. The state shall retain the right to periodically monitor calibration results and/or to verify field standard compliance to specifications and tolerances when field standards are initially placed into service or at any intermediate point between calibrations. (Added 1966) (Amended 1984, 1999, and 2005) The Committee received written comments on all items in Block 4 and Block 5, as well as LPG-4 and MFM-2 emphasizing the need for there to be more study and discussion of the issues to assess the ramifications of all the proposed changes. The Committee also received written comments from the SMA that it looks forward to further information on these items and stating that it is important to be consistent in our use of terms across multiple sections of NIST Handbook 44. The Committee agreed to carryover this group of items on its 2019 agenda to allow for further discussion and development of these proposals.

The Committee received written comments on all items in Block 4 and Block 5, as well as LPG-4 and MFM-2 emphasizing the need for there to be more study and discussion of the issues to assess the ramifications of all the proposed changes. The Committee also received written comments from the SMA that it looks forward to further information on these items and stating that it is important to be consistent in our use of terms across multiple sections of NIST Handbook 44. The Committee agreed to carryover this group of items on its 2019 agenda to allow for further discussion and development of these proposals.

NCWM 2019 Interim Meeting: The S&T Committee decided to combine the items on the agenda dealing with the issue of transfer standard (including items already combined into blocks) into one block. Block 1 (New) of the Interim Meeting report now includes GEN-3, Block 1 (original items from the 2019 interim agenda that appeared under Block 1), Block 2, LPG-3, and MFM-5, which were all separate items and blocks of items on the S&T Committee’s 2019 Interim Meeting agenda (NCWM Publication 15). Agenda items GEN-3, Block 1, Block 2, LPG-3, and MFM-5 are listed separately on the Interim agenda with a note added beneath each individual item referring the reader to the New B1 items. All items under this New B1 have retained the same numbering system for ease in referring to the appendix for discussion on each item.

NCWM 2019 Annual Meeting: Mr. Brett Gurney (NCWM Chairman) commented regarding the formation of a Task Group assigned to further develop this block proposal. The TG is charged with providing definitions for various types of standards (transfer, field, reference, etc.) as well as the criteria to be met by these types of standards. The completion date given to the TG is July 2021. The Committee agreed to the Assigned status for this block of items and looks forward to hearing updates from the TG. The Chair of the task group was:

Mr. Jason Glass
Kentucky Department of Agriculture
502-573-0282, jason.glass@ky.gov

NCWM 2020 Interim Meeting: Field Standard TG Chair Jason reported that the Task Group met prior to the Interim meeting and has begun discussion of the items under Block 1. Mr. Glass stated that bi-weekly teleconference meetings were scheduled and that the group was optimistic but had significant work to accomplish.

Mr. Russ Vires (SMA) supports the Scale item, SCL 18.1; in this block, Mr. Dimitri Karimov (Meter Manufacturers Association) supports the Task Group activities, Ms. Tina Butcher was encouraged with the progress on terminology and provided an update on the Mass Flow Meter testing reporting that field testing was conducted October 28 to November 1, 2019 and that State and Industry participation included Colorado, Florida, Oregon, Emerson, and Tulsa Gas Technology.

Mr. Kurt Floren (Los Angeles Co., CA) raised concerns with GEN-19.1. regarding the definition of “Standard, Field” and its reference to “stable” standards and how long a standard is expected to be stable, which is typically 1-year, for which he believes should be longer. Mr. Floren also questioned the statement in the definition “tested over a range of environmental and operational conditions that the measuring devices is used...” Mr. Floren noted that he was unsure if all laboratories will have the capabilities to test over this wide range of conditions. Mr. Floren also expressed concerns with the definition “Standard, Transfer” citing that this standard may not meet the fundamental considerations requirement for standards over a long period of time or wide range of environmental conditions.

Mr. Steve Harrington (Oregon) echoed Mr. Floren’s comments. Field Standard TG Chair Glass responded that these are concerns of the TG and these issues will be discussed and considered as the TG develops these items.

During the Committee’s work session, the Committee agreed that this item should remain an Assigned item.

2021 NCWM Interim Meeting: NCWM Field Standard TG Chair, Jason Glass provided an update on the Task Group activities. Mr. Glass reported that the field standard Task Group is following the activities of the NIST Master Meter Project and that the Task Group reviewed API specifications for use of master meters as a standard and a test protocol that will be used to ensure uniformity in collecting data on master meters used as field standards. He also reported that the TG does not have a recommendation for this item. Mr. Glass also reported that he would be stepping down as the TG Chair. Mr. Mike Keilty (Endress+Hauser AG) thanked Chair Glass and the TG for their work and requested that Block 1, LPG-15.1, N.3. and Block 1 MFM-15.1, N.3 be removed from Block 1 items and to allow those items to move forward separate from the other Block 1 Items. Mr. Keilty stated that similar language was added to the Hydrogen code and that the proposed language in LPG-15.1 N.3. and MFM-15.1, N.3 will allow for the recognition of master meters as field standards. Mr. Henry Oppermann (WM-Consulting), stated that data is needed to ensure that master meters can be used over a range of conditions. Mr. Robert Murnane (Seraphin) stated that jurisdictions have the ability to use meters and that Block 1 LPG-15.1, N.3 and Block 1 MM-15.1, N.3 should remain in Block 1 until data is available to support the use of master meters as a standard. Mr. Keilty mentioned that there has been useful dialog regarding master meters in the TG, but that he is concerned that the TG is not close to deciding and he expressed concerns with the TG’s focus on the NIST Master Meter Project. Mrs. Tina Butcher (NIST OWM) provided an update on the NIST Master Meter Project and noted that States have the regulatory powers to accept or reject a standard. She also mentioned that NIST is working with States to collect data needed to assess master meters and preliminary testing was conducted and data was collected on CNG at Tulsa Gas Technology’s facility in fall 2019. Ms. Diane Lee (NIST OWM) noted that NIST OWM feels that it is premature to add more language to the Handbook 44 on master meters without data to support its use.

During the Committee’s work session, the Committee agreed to keeps all items in Block 1 and that this item should remain with an Assigned status.

NCWM 2021 Annual Meeting: Mr. Glass reported that he would be stepping down as the Field Standard TG Chair. The Committee heard updates from members of the Task Group during open hearings. Mr. Michael Keilty noted that two of the items had been on the agenda since 2015 and requested that they be removed from the block and recommended recognizing the use of master meters. Other comments were to keep the items together until data is analyzed from the NIST Field Reference Standard Work Group to support the use of master meters but that if some items were removed from the block, all items should be removed from the block. Based on comments heard during the 2021 Annual Meeting, the S&T Committee recommended that all items that were included in Block 1 “Terminology For Testing Standards” that originally appeared as a separate item or a separate block of items on the

S&T agenda in and prior to 2019, be removed from Block 1 “Terminology For Testing Standards” and appear as originally presented.

During the 2021 Committee work session the Committee recognized that the Task Group has accomplished all it is able to at this point and is recommending the Task Group be disbanded and will make said recommendation to the NCWM Chairman. The Committee agreed to break all items in Block 1 into individual items and designate them all as Developing. The Committee thanks the Task Group and its members for their work.

NCWM 2022 Interim Meeting: Ms. Diane Lee (NIST, submitter) provided written comments recommending withdrawal of the block. Ms. Lee spoke during open hearings to explain that while the items have merit and will continue to be worked on, they should be withdrawn at this time while the language and terms are aligned with other items in the handbook.

Written comments were received from Mr. Russ Vires, representing the Scale Manufacturers Association (SMA). Mr. Vires (representing the SMA) also spoke during the open hearing to express the support for further development. Additional comments were heard from regulatory officials recommending development of the block items.

During the S&T Committee work session, the committee agreed to recommend this item for withdrawal to allow for the submitter to continue work on this item and allow for alignment as other related items in the Handbook are developed and move forward.

Regional Associations’ Comments:

WWMA 2021 Annual Meeting: Russell Vires (Mettler Toledo): there are some conflicts now that GEN-19.1 has been removed (from the block). OTH-18.1: some conflicts there. This needs additional work. Recommend that it remains developing to give stakeholders opportunity to properly vet item. Diane Lee (NIST OWM): Russ is correct. Previous agenda - OTH-18.1 was listed as a separate item on the agenda but it has always been a part of block 1 (concern raised). That is fixed and 18.1 is included. What do we call master meters? What do we call transfer standards? NIST wants to call everything a field standard. All items were in a block - 18.1 should remain in the block but it was removed. NIST supports developing. Kurt Floren (LA County): won’t comment on tech. aspects. Question on status? SCL-18.1 and OTH-18.3: these are shown as assigned items. Have they been assigned to a task force? Are they still in the hands of NIST? Need to define the terms (field standard and transfer standard). Josh Nelson (Ex-Officio NCWM S&T Committee): to Kurt - it had previously been assigned but the task group disbanded to allow NIST to continue their work on the questions at hand. They are looking to have members of that group to join the NIST group to gain more understanding. This is a typo - should be changed to developmental. Matt Douglas (California - DMS): California supports further development. Cadence Matijevich (Nevada) : NIST HB 105 - may be a useful reference doc. To look at the definitions. To avoid conflict bet. HB44 and HB105.

The WWMA S&T Committee recommends the status remain developmental.

SWMA 2021 Annual Meeting: Mr. Oppermann, Weights and Measures Consulting, Seraphin, stated that you can’t call everything a Field Standard, and that he supports this item remaining Developing so the group can work with OWM to align their terminology. Russ Vires, SMA, stated they support SCL/ABW/AWS because it is important to use consistent terminology across Handbook 44. Russ Vires, Mettler Toledo, stated that this item conflicts with Gen 19.1, and that he supported this item remaining Developing. This committee feels that more work needs to be done on this item regarding consistent terminology.

This committee recommends this item remain Developing pending the Field Standard Task Group finding a new Chairperson.

CWMA 2021 Interim Meeting: Diane Lee-NIST mentioned that other items have been taken out of this block. Will be working with Seraphin to come up with better language. Is maybe “Meter” more suitable. Should stay has developing. Tina Butcher-NIST submitted OTH 22.1 and will help develop more. Lou Straub-SMA can support ABW-18.1 and AWS-18.1. Charles Stutesman-Kansas has issues with term “master meter”. Ivan Hankins-Iowa Why can’t we use the term “prover” doesn’t understand “transfer meter or master meter”.

CWMA S&T Committee recommends item as developing.

NEWMA 2021 Interim Meeting: Henry Opperman (W&M Consulting/Seraphin) commented that this item should remain a developing item along with continued discussions with NIST OWM. Lou Straub (SMA) supports the proposal as it applies to the items SCL-18.1, ABW-18.1, and AWS-18.1 items, and looks forward to further development by the Task Group. Henry Opperman (Seraphin) commented that this block originally contained (Gen 19.1) that was separated from the block and recommends further development.

The NEWMA Specifications and Tolerances Committee recommends that this item remain in Developing Status.

Additional letters, presentation and data may have been submitted for consideration with this item. Please refer to <https://www.ncwm.com/publication-16> to review these documents.

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

NOTES:

1. *At the 2020 NCWM Interim Meeting the committee agreed that GEN-20.1, SCL-20.1 and SCL-20.2 should be removed from Block 2 and given individual consideration. The items included in this block 2 are SCL-20.3, SCL-20.4, SCL-20.5, SCL-20.6, SCL-20.7 and SCL-20.8.*
2. *While this item was carried over from the 2020 Interim Meeting, it was not a voting item and therefore not discussed during the continuation of the 2020 Annual Meeting. Instead, it was placed on the 2021 Interim Meeting's agenda and was discussed during that meeting.*

Source:

Ross Andersen (Retired)

Purpose:

This proposal has four parts:

1. Clarify the concepts in determining error in verification,
2. Correct Code references to ensure correct reference to either e or d, as appropriate,
3. Correct Code references regarding issues of scale suitability Table 8, and
4. Explain why e and d are not connected

B2: SCL-20.3 A S.5.4. Relationship of Minimum Load Cell Verification Interval to the Scale Division

Item Under Consideration:

Amend Handbook 44, Scales Code as follows:

S.5.4. Relationship of Minimum Load Cell Verification Interval Value to the Scale Division – *The relationship of the value for the minimum load cell verification scale interval, v_{min} , to the verification scale division, Δe , for a specific scale using National Type Evaluation Program (NTEP) certified load cells shall comply with the following formulae where N is the number of load cells in a single independent¹ weighing/load-receiving element (such as hopper, railroad track, or vehicle scale weighing/load-receiving elements):*

$$(a) \ v_{min} \leq \frac{\Delta e}{\sqrt{N}} \text{ for scales without lever systems; and}$$

$$(b) \ v_{min} \leq \frac{\Delta e}{\sqrt{N} \times (\text{scale multiple})} \text{ for scales with lever systems.}$$

¹"Independent" means with a weighing/load-receiving element not attached to adjacent elements and with its own A/D conversion circuitry and displayed weight.

~~[*When the value of the scale division, d , is different from the verification scale division, e , for the scale, the value of e must be used in the formulae above.]~~

This requirement does not apply to complete weighing/load-receiving elements or scales, which satisfy all the following criteria:

- the complete weighing/load-receiving element or scale has been evaluated for compliance with T.N.8.1. Temperature under the NTEP;
- the complete weighing/load-receiving element or scale has received an NTEP Certificate of Conformance; and
- the complete weighing/load-receiving element or scale is equipped with an automatic zero-tracking mechanism which cannot be made inoperative in the normal weighing mode. (A test mode which permits the disabling of the automatic zero-tracking mechanism is permissible, provided the scale cannot function normally while in this mode.

[Nonretroactive as of January 1, 1994]

(Added 1993) (Amended 1996, ~~and 2016,~~ and 20XX)

NEWMA Report: B2: SCL-20.3

Regional recommendation to NCWM on item status:

- ☐ Recommend as a Voting Item on the NCWM agenda
- ☐ Recommend as an Information Item on the NCWM agenda
- ☒ Recommend as an Assigned Item on the NCWM agenda
(To be developed by an NCWM Task Group or Subcommittee)
- ☐ Recommend as a Developing Item on the NCWM agenda
(To be developed by source of the proposal)
- ☐ Recommend Withdrawal of the Item from the NCWM agenda
(In the case of new proposals, do not forward this item to NCWM)
- ☐ No recommendation from the region to NCWM
(If this is a new proposal, it will not be forwarded to the national committee by this region)

Comments and justification for the regional recommendation to NCWM: (This will appear in NCWM reports)

Mr. Russ Vires (SMA) commented on the block in general to support development and encourage the use of “verification interval” for e and “scale division” for d in every instance as it appears in this block. Ms. Tina Butcher (NIST OWM) believes latest revisions from task group have addressed concerns.

After hearing comments from the floor, the committee recognized the need to further develop this block and recommended the block retain assigned status.

B2: SCL-20.4 A Table 3. Parameters of Accuracy Classes.

Item Under Consideration:

Amend Handbook 44, Scales Code as follows:

Table 3. Parameters for Accuracy Classes			
Class	Value of the Verification Scale Division $\frac{e^I}{(d \text{ or } e^{\pm})}$	Number of Scale ⁴ Divisions (n)	
		Minimum	Maximum
SI Units			

Table 3.
Parameters for Accuracy Classes

<i>I</i>	<i>equal to or greater than 1 mg</i>	<i>50 000</i>	<i>--</i>
<i>II</i>	<i>1 to 50 mg, inclusive</i>	<i>100</i>	<i>100 000</i>
	<i>equal to or greater than 100 mg</i>	<i>5 000</i>	<i>100 000</i>
<i>III^{2,5}</i>	<i>0.1 to 2 g, inclusive</i>	<i>100</i>	<i>10 000</i>
	<i>equal to or greater than 5 g</i>	<i>500</i>	<i>10 000</i>
<i>III L³</i>	<i>equal to or greater than 2 kg</i>	<i>2 000</i>	<i>10 000</i>
<i>IIII</i>	<i>equal to or greater than 5 g</i>	<i>100</i>	<i>1 200</i>
U.S. Customary Units			
<i>III⁵</i>	<i>0.0002 lb to 0.005 lb, inclusive</i>	<i>100</i>	<i>10 000</i>
	<i>0.005 oz to 0.125 oz, inclusive</i>	<i>100</i>	<i>10 000</i>
	<i>equal to or greater than 0.01 lb</i>	<i>500</i>	<i>10 000</i>
	<i>equal to or greater than 0.25 oz</i>	<i>500</i>	<i>10 000</i>
<i>III L³</i>	<i>equal to or greater than 5 lb</i>	<i>2 000</i>	<i>10 000</i>
<i>IIII</i>	<i>greater than 0.01 lb</i>	<i>100</i>	<i>1 200</i>
	<i>greater than 0.25 oz</i>	<i>100</i>	<i>1 200</i>

¹ ~~For Class I and II devices equipped with auxiliary reading means (i.e., a rider, a vernier, or a least significant decimal differentiated by size, shape, or color), the value of the verification scale division “e” is the value of the scale division immediately preceding the auxiliary means. The manufacturer may design a scale such that the verification scale division e does not be equal to the scale division d. To ensure the correct value for e is used, refer to marking requirements in footnotes 3 and 4 to Table S.6.3.a. and Table S.6.3.b.~~
(Amended 20XX)

² A Class III scale marked “For prescription weighing only” may have a verification scale division (e) not less than 0.01 g.
(Added 1986) (Amended 2003)

³ The value of ~~a~~ the verification scale division (e) for crane and hopper (other than grain hopper) scales shall be not be less than 0.2 kg (0.5 lb). The minimum number of scale divisions shall not be less than 1000.
(Amended 20XX)

⁴ On a multiple range or multi-interval scale, the number of divisions for each range independently shall not exceed the maximum specified for the accuracy class. The number of scale divisions, n, for each weighing range is determined by dividing the scale capacity for each range by the verification scale division, e, for each range. On a scale system with multiple load-receiving elements and multiple indications, each element considered shall not independently exceed the maximum specified for the accuracy class. If the system has a summing indicator, the n_{max} for the summed indication shall not exceed the maximum specified for the accuracy class.
(Added 1997)

⁵ The minimum number of scale divisions for a Class III Hopper Scale used for weighing grain shall be 2000.)

[Nonretroactive as of January 1, 1986]

(Amended 1986, 1987, 1997, 1998, 1999, 2003, ~~and~~ 2004, and 20XX)

NEWMA Report: B2: SCL-20.4	
Regional recommendation to NCWM on item status:	
<input type="checkbox"/> Recommend as a Voting Item on the NCWM agenda <input type="checkbox"/> Recommend as an Information Item on the NCWM agenda <input checked="" type="checkbox"/> Recommend as an Assigned Item on the NCWM agenda <i>(To be developed by an NCWM Task Group or Subcommittee)</i> <input type="checkbox"/> Recommend as a Developing Item on the NCWM agenda <i>(To be developed by source of the proposal)</i> <input type="checkbox"/> Recommend Withdrawal of the Item from the NCWM agenda <i>(In the case of new proposals, do not forward this item to NCWM)</i> <input type="checkbox"/> No recommendation from the region to NCWM <i>(If this is a new proposal, it will not be forwarded to the national committee by this region)</i>	
Comments and justification for the regional recommendation to NCWM: (This will appear in NCWM reports)	
Mr. Russ Vires (SMA) recommended the following change to Table 3, Footnote 1: Class I and II scales may be designed such that the verification interval e does not equal the scale division d.	

B2: SCL-20.5 A Table S.6.3.a. Marking Requirements, Note 3.

Item Under Consideration:

Amend Handbook 44, Scales Code as follows:

3. The device shall be marked with the nominal capacity. *The nominal capacity shall be shown together with the value of the scale division “d” (e.g., 15×0.005 kg, 30×0.01 lb, or capacity = 15 kg, $d = 0.005$ kg) in a clear and conspicuous manner and be readily apparent when viewing the reading face of the scale indicator unless already apparent by the design of the device. Each scale division value ~~or weight unit~~ with its associated nominal capacity shall be marked on multiple range or multi-interval scales. In the absence of a separate marking of the verification scale division “e” (see Note 4), the value of the verification scale division e shall be equal to the value of the scale division d.*
 [Nonretroactive as of January 1, 1983]
 (Amended 2005 and 20XX)

NEWMA Report: B2: SCL-20.5	
Regional recommendation to NCWM on item status:	
<input type="checkbox"/> Recommend as a Voting Item on the NCWM agenda <input type="checkbox"/> Recommend as an Information Item on the NCWM agenda <input checked="" type="checkbox"/> Recommend as an Assigned Item on the NCWM agenda <i>(To be developed by an NCWM Task Group or Subcommittee)</i> <input type="checkbox"/> Recommend as a Developing Item on the NCWM agenda <i>(To be developed by source of the proposal)</i> <input type="checkbox"/> Recommend Withdrawal of the Item from the NCWM agenda <i>(In the case of new proposals, do not forward this item to NCWM)</i> <input type="checkbox"/> No recommendation from the region to NCWM <i>(If this is a new proposal, it will not be forwarded to the national committee by this region)</i>	
Comments and justification for the regional recommendation to NCWM: (This will appear in NCWM reports)	
No comments were heard from body on this item.	

B2: SCL-20.6 A T.N.1.2. Accuracy Classes and T.N.1.3. Scale Division.**Item Under Consideration:**

Amend Handbook 44, Scales Code as follows:

T.N.1.2. Accuracy Classes. – Weighing devices are divided into accuracy classes according to the number of scale divisions (n) and the value of the verification scale division (ϵ) (e).

T.N.1.3. Scale Division. – **This Code contains references to two types of scale divisions, the verification scale division (e) and the scale division (d) (see definitions in Appendix D.).** The tolerance for a weighing device is **in the order of magnitude of related to the value of the scale division (d) or the value of the verification scale division (e) and is generally expressed in terms of d or e .** **Other technical requirements may reference either the verification scale division (e) or scale division (d) as appropriate. The values of (e) and (d) are chosen by the manufacturer and are marked on the device pursuant to S.6.3., except that d is not used in reference to an analog device, such as an equal-arm balance, where the graduations do not correspond to units of weight.**

NEWMA Report: B2: SCL-20.6**Regional recommendation to NCWM on item status:**

- ☐ Recommend as a Voting Item on the NCWM agenda
- ☐ Recommend as an Information Item on the NCWM agenda
- ☒ Recommend as an Assigned Item on the NCWM agenda
(To be developed by an NCWM Task Group or Subcommittee)
- ☐ Recommend as a Developing Item on the NCWM agenda
(To be developed by source of the proposal)
- ☐ Recommend Withdrawal of the Item from the NCWM agenda
(In the case of new proposals, do not forward this item to NCWM)
- ☐ No recommendation from the region to NCWM
(If this is a new proposal, it will not be forwarded to the national committee by this region)

Comments and justification for the regional recommendation to NCWM: (This will appear in NCWM reports)Mr. Russ Vires recommended the following change: "... except that (d) is not used in reference..."**B2: SCL-20.7 A Table 7. Maintenance Tolerances****Item Under Consideration:**

Amend Handbook 44, Scales Code as follows:

Table 6. Maintenance Tolerances (All values in this table are in <u>verification</u> scale divisions)				
Tolerance in <u>Verification</u> Scale Divisions				
	1	2	3	5
Class	Test Load			
I	0 - 50 000	50 001 - 200 000	200 001 +	
II	0 - 5 000	5 001 - 20 000	20 001 +	
III	0 - 500	501 - 2 000	2 001 - 4 000	4 001 +
III L	0 - 50	51 - 200	201 - 400	401 +
III L	0 - 500	501 - 1 000	(Add 1 ϵ for each additional 500 ϵ or fraction thereof)	

1

NEWMA Report: B2: SCL-20.7
Regional recommendation to NCWM on item status: <input type="checkbox"/> Recommend as a Voting Item on the NCWM agenda <input type="checkbox"/> Recommend as an Information Item on the NCWM agenda <input checked="" type="checkbox"/> Recommend as an Assigned Item on the NCWM agenda <i>(To be developed by an NCWM Task Group or Subcommittee)</i> <input type="checkbox"/> Recommend as a Developing Item on the NCWM agenda <i>(To be developed by source of the proposal)</i> <input type="checkbox"/> Recommend Withdrawal of the Item from the NCWM agenda <i>(In the case of new proposals, do not forward this item to NCWM)</i> <input type="checkbox"/> No recommendation from the region to NCWM <i>(If this is a new proposal, it will not be forwarded to the national committee by this region)</i>
Comments and justification for the regional recommendation to NCWM: <i>(This will appear in NCWM reports)</i> Mr. Russ Vires (SMA) recommended changing the title of the item to Table 6. Maintenance Tolerance.

2 **B2: SCL-20.8 A Table 8. Recommended Minimum Load**3 **Item Under Consideration:**

4 Amend Handbook 44, Scales Code as follows:

Table 8. Recommended Minimum Load		
Class	Value of Scale Division (d or e*)*	Recommended Minimum Load (d or e*)*
I	equal to or greater than 0.001 g	100
II	0.001 g to 0.05 g, inclusive	20
	equal to or greater than 0.1 g	50
III	All**	20
III L	All	50
III	All	10
<p>*For Class I and II devices equipped with auxiliary reading means (i.e., a rider, a vernier, or a least significant decimal differentiated by size, shape or color), the value of the verification scale division "e" is the value of the scale division immediately preceding the auxiliary means. For Class III and III devices the value of "e" is specified by the manufacturer as marked on the device; "e" must be less than or equal to "d." Scales manufacturers are permitted to design scales where the value a verification scale division e differs from the displayed scale division d. If the marked value of e is less than the value of d, use e in interpreting the Table. In all other cases use the value of d. Refer to marking requirements for d and e in footnotes 3 and 4 to Table S.6.3.a. and Table S.6.3.b. <u>(Amended 20XX)</u></p> <p>**A minimum load of 10 g is recommended for a weight classifier marked in accordance with a statement identifying its use for special applications.</p>		

(Amended 1990) **(Amended 20XX)**

5

Background/Discussion:

These items have been assigned to the newly formed Verification Scale Division (e) Task Group for further development. For more information or to provide comment, please contact the task group chair:

Mr. Doug Musick
Kansas Department of Agriculture
785-564-6681, doug.musick@ks.gov

Most scales under the Scales Code are designated by the manufacturer to have a value of e that equals d. Where e and d are not equal, there has been confusion in interpreting the Scales Code since the Code was adopted in 1984 (taking effect in 1986). This confusion came to the forefront with the needs arising from the cannabis trade. I believe that there were errors in translating OIML R76 (the basis of the current Scales Code) to HB44 format, there were key issues that were lost in translation, and finally there is misunderstanding of the HB44 Code that contributed to this confusion. This proposal will seek to identify the sources of confusion and offer revisions to make correction.

In this discussion I will be using the OIML term instrument when referencing a complete scale or weighing system. This eliminated the dual meaning of the term “device.” A device will only refer to functioning parts of an instrument. Finally, the term “scale” will not be a weighing instrument. Scale will refer only to the measurement scale, i.e., analog graduations or digital divisions.

1. Determining Error in Verification

GEN-20.1.

In 2017, item 3200-7, a proposal to revise the expression of tolerances in several codes, was considered and withdrawn by the S&T Committee. The proposal aimed to correct the missing reference in those codes to errors of overregistration and underregistration. It also included a change to the definition of overregistration and underregistration that was prompted in part to a lack of understanding of the process of verification. Many of the comments received indicated that it was better handled through training. Additionally, the NCWM is working on the issue of alternative test methods which directly impacts the subject of verification. In reviewing the 2017 proposal again, I believe the real problem is a misunderstanding of the process of verification itself, stemming from a missing definition for “True Value.”

The new definition and changes to the General Code correct deficiencies in the code. The “true value” has never been clearly defined in code although it may be inferred from the definitions. The concept of true value is essential to understanding verification process as it is used throughout the Handbook. It is also a legal issue establishing the basis for tolerance decisions with the uncertain test procedure clearly stated. Our decisions are based on the true value derived from a traceable standard and not based on the standard itself. Once established, the true value is considered to have no error for purposes of legal verification. In our tests, the uncertainties in the test procedure are unquantified. If you have to defend your test in court and are asked about the uncertainty in your test, what will you answer? With the addition of the True Value definition, you have a traceable test report for your standard and the text of G-T.3. regarding the legality of the specified test procedure. The verification process formally addresses the risks in two ways. First the risks are kept small by the standard and procedure specified. Second, the risks are shared equally between buyers and sellers. The enhancements explain clearly how errors are computed and how they are interpreted.

The addition of a % error definition in G-T.3. corrects a deficiency that was identified in testing LMD’s. The tolerances in the LMD codes are expressed using errors of overregistration /underregistration (device indication – true value). Yet we in the US traditionally calculate those errors as errors of excess/deficiency (true value – device indication). When calculating % error in these calculations, it seemed appropriate to put the device indication in the denominator, but this is incorrect. All error calculations must be in terms of the true value, especially % calculations.

SCL-20.1

The addition of the Note addresses the issue of digital rounding. Parallel to R 76, the note requires errors to be determined to a resolution of at least 0.2 e. Remember that error = indication – true value, and the true value is normally the nominal value of the test weight. That means determining the indication to a resolution of 0.2 e or finer using error weights or other means when $e \geq 2d$, or by directly reading the indications when $e \geq 5d$. This means if $e = 5d$ or $e = 10d$, the indication is resolved fine enough to reduce the rounding error. In R76, the requirement is to “eliminate” rounding error, but this is not possible. You can only reduce it to 0.5 of whatever division size you resolve the

indication. Hence, the proposal uses the term “reduce” instead of “eliminate.” The waiver allows field inspectors to continue to use direct reading when $e = d$, with a resulting rounding error of $0.5 e$. This accepts the additional risk of passing devices outside the tolerances. (See section 4 of the proposal)

The changes to the two Scales Code tolerance paragraphs create a specific reference to the type of error in G-T.3. In this case it formally states errors are errors of overregistration/underregistration. The other change in T.1.1. addresses the missing part about applying tolerances to net values as well as gross values for unmarked scales. I believe this was just an oversight in 1984, as applying tolerances to either gross or net loads had been the established practice long before the 1984 changes to the Scales Code.

2. Correct Code references to ensure correct reference to either e or d, as appropriate.

SCL-20.2

Section S.1.2.2. is not dealing with the verification scale division e as the title implies. Instead, it is dealing with special requirements for instruments designed such that e does not equal d .

Section S.1.2.2.2. is not a specification issue directed to the manufacturer, but rather a question of suitability. It should have been put into the User Requirements section 1. Selection Requirements. For a discussion of the option to delete this refer to part 4 of the proposal.

SCL-20.3

The correct value for the table is e . The use of d in the formulas only works when $e = d$. That is addressed in the note * below, which is not necessary when e is used in the formulas.

SCL-20.4

- The inclusion of references to d in the header to column 2 of the table is technically incorrect. The verification scale division must refer only to e .
- The change to Note 1 serves to eliminate the confusion about considering e to be the digit to the left of d , and ensures the e value comes from the markings on the device. It is the manufacturer who chooses e for classification purposes.
- The changes to note 3 correctly references the verification scale division e and not the scale division d , and they clean up some grammatical errors.

SCL-20.5

The change clarifies that the verification scale division is equal to the marked d when no separate marking of e is provided. Note that nothing in Note 3 prevents marking $d = 1 \text{ g}$ $e = 1 \text{ g}$, or capacity $10000 \text{ g} \times 1 \text{ g}$ $e = 1 \text{ g}$. The change to the last sentence cleans up a nonsensical term “weight unit.” The scale division must be in a unit of weight, e.g., g, kg, lb, etc. The intent was to have each range of a multi-range device include a capacity and division size n . Note R76 requires marking of Class, Max (capacity), and e , with a marking of d is only required when $e < d$.

SCL-20.6

The change to T.N.1.1.2. corrects the contradiction between the current code using d and the definition using e in determining accuracy class. The value of n in the definitions already correctly refers to e .

The change to T.N.1.1.3. is an attempt to clarify (e) and (d) similar to R 76 in Table 2. Note that when $e=d$, under S.6.3. only one marking is required. It is only when $e \neq d$ that S.6.3. requires both to be marked. The addition of material for ungraduated analog devices is housekeeping since d has no meaning for these devices. The change also clarifies that some requirements are directed to d (functional requirements on the device) and some to e (relating to classification and tolerance values).

3. Discuss issues of suitability of scales when e and d are not equal.

SCL-20.7

It is the value of e that is used in specifying tolerances according to the definition of e , and all values in this table must be expressed in terms of e . The table is currently written in terms of the scale division d , which is technically incorrect.

SCL-20.8

The parenthetical (d or e) in the headers to columns 2 and 3 is confusing when the two are not equal. Which one do you use? The note may address Class I and II devices, but it does not help with weight classifiers in Classes III and IIII, where you certainly don't want to use d.

It is vital to note that for instruments under R76 the manufacturer is required to mark a minimum load (Min). The manufacturer calculates Min using e. However, the minimum load is marked in mass units matching the instrument display in divisions of d. There is no confusion since it is marked on the instrument. In HB44 the inspector must determine the minimum load from Table 8 and the scale markings. Most users don't even know this requirement exists, unless told by the inspector.

Table 8 is addressing the large significance of rounding error at small loads. The table must be clear to ensure the correct scale division is used in enforcement. The table at right shows the relative errors resulting from roundoff to the nearest scale division d at various loads in the table. In principle, we are trying to ensure loads weighed are sufficient to reduce the relative errors to the levels shown, i.e. for Class I – 0.5%, for Class II – 1.0%, Class IIII – 1.0%, for Class III – 2.5%, and Class IIII – 5%. While these might seem large initially, there is a diminishing returns effect. A small percentage of a small number tends to be insignificant. Because the value of commodities goes up as the accuracy goes up, we have more stringent requirements on Classes I and II.

Load d	Relative Error
10	5.0%
20	2.5%
50	1.0%
100	0.5%

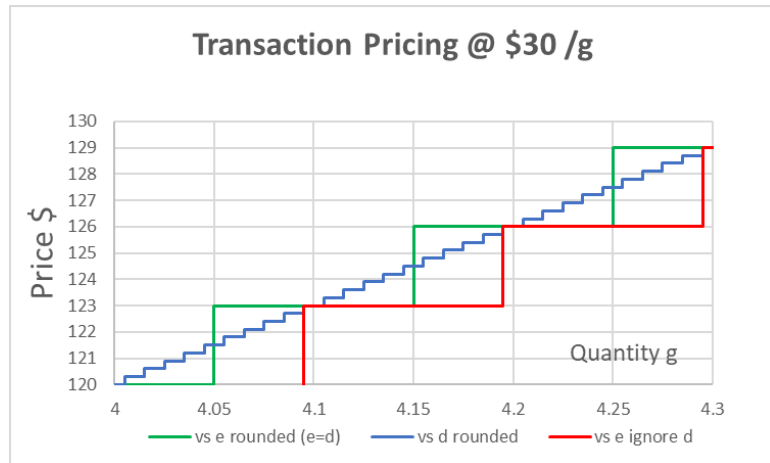
Scales fall into three categories, i.e. with $e > d$, $e = d$, and $e < d$.

- If $e < d$, e.g. weight classifiers, it seems clear the appropriate choice is e. The table in the second note specifies d, which is technically incorrect. For example, a Class III weight classifier with $d = 50$ g $e = 1$ g, the relative accuracy of 5% is reached at 10 e. At 10 d or (500 e) the relative error due to rounding is 0.1%.
- If $e = d$, it doesn't matter.
- If $e > d$, on some Class I and II scales, you get the desired relative error when you use d. If you use e, the scale with $e \neq d$ will result in much smaller rounding error since the rounding is internally applied to d and not to e. Examples: If $e = 0.1$ g, then 50 e is 5 g and the rounding error is $0.5 e / 50 e = 1\%$, i.e. the desired level for Class II. If $e = 0.1$ g and $d = 0.01$ g, then 50 e is 5 g and the rounding is to 0.5 d or 0.05 e, thus the rounding error is $0.05 e / 50 e = 0.1\%$. This may be why the parenthetical (d or e) is used in the current language. Perhaps it was intended that we use the smaller value of the two if e and d are different. The proposal states e is used in cases where $e < d$ and d is used in all other cases. This eliminates any confusion. We may consider adding a marking of Min as per R76 as a future idea.

The change to the * note performs a similar function to the change in Note 1 in Table 3, as it disconnects e from d and relies solely on the markings of d and e.

In 2017, the NCWM added S.1.2.2.2. to prohibit use of Class I and II scales with a differentiated scale division. One argument was that the differentiated digit would cause confusion. There were arguments in opposition to the proposal. I argued that the confusion rested mostly with the weights and measures community (see earlier discussion). Plus, the finer digit extended the usable range of the scale since you could reach the 1% limit to rounding error at 50 d. For a Class II scale with $e = 0.1$ g and $d = 0.01$ g, that means weighing small loads down to 0.5 g loads which is something that users need in the cannabis trade.

One issue involves the rounding errors addressed in Table 8. A more critical issue in my view is the pricing increments. At \$30/g, 0.1 g e represents a pricing increment of \$3. By displaying 0.01 g d, that 0.01 g d reduces the price increment to \$0.30. This is displayed in the graph at right. The blue line shows the 30 cent steps if you use the differentiated d. If you use the digit to the left of the differentiated d, you see the counted divisions e discussed earlier. The gap between the blue and red lines show the losses to users if they are forced to round down. The green line shows pricing on a normally rounded scale with 0.1 g e. The normal rounding shares the risk equally between buyer and seller.



If the user must have a scale with $e = d$, then it forces them to go to 0.01 g e to service loads at the 1 g level. For that scale 50 e is 0.5 g, and the 1 g loads weighed are near 100 e. Precision scales rarely use 2 or 5 divisions, so capacities get reduced by a factor of 10 to move down to the next smaller division size. Blocking the use of $e=10d$ may force many users to purchase two scales where a single scale would have been suitable if using a scale with a differentiated d were not blocked.

4. Discussion regarding disconnecting e from d

Sections in the current Scales Code are being incorrectly interpreted to imply there is a direct connection between e and d. Essentially there is a belief when inspecting Class II scales when e does not equal d that we are somehow verifying the first digit to the left of d. Even when $e = d$, there is a belief that we are verifying d. That fails to follow the principles incorporated in G-T.3. We are not verifying the division; we are verifying the entire instrument indication at an applied load.

The scale division d is defined as the smallest division of the instrument under test (IUT). The scale division is referred to extensively in the code and we find that requirements written around d regulate the operating characteristics of the instrument, e.g. discrimination. When reading analog indications, we round to the nearest graduation (See Appendix A. Section 10). Under General Code G-S.5.2.2. (d), there is an important requirement that the smallest division of any digital device round off. Unless specifically designated the instruments in HB44 are in "normal rounding" class of instruments. Even with normal rounding, it is critical to understand that the digits to the left of the least significant digits are not rounded. They are counted. For example, as you count the rounded-off d's, when you increment from 9 to 0 in the least significant digit, the next digit increments 1 digit. The break point between digits to left of the least significant digit always occurs at 9.5 d. If d is 1 g, then the tenth d is counted as 10 g and the 100th d is counted as 100 g, etc. Normal rounding of the tens place would normally occur at 5.0 d. If you attempt to apply tolerances to e and just ignore d, you are not rounding in conformance to G-S.5.2.2. (d). Instead, you are rounding down, which places the scale user at a disadvantage and disrupts equity.

UR.3.10. addresses dynamic monorail scales, which also have $e \neq d$, and requires that the commercial transaction using these devices shall be based on e , interpreted to mean the digit to the left of the differentiated d . These transactions therefore must be based on a counting scale (rounding down) instead of a half-up/half-down system as required in G-S.5.2.2. (d). When applied to a high-priced commodity at \$30 /g, the pricing errors add up because the scale user is forced to always round down. The table at right shows the impact, and this impact can be attributed to every transaction. At \$30/g, the average loss to the user per transaction is \$1.35. That is not equity!

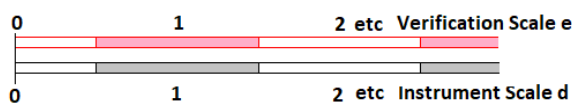
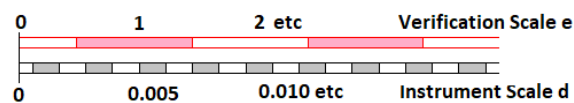
Indication	\$ Using d	\$ Using e	\$ gain/loss
0.95	\$28.50	\$27.00	-\$1.50
0.96	\$28.80	\$27.00	-\$1.80
0.97	\$29.10	\$27.00	-\$2.10
0.98	\$29.40	\$27.00	-\$2.40
0.99	\$29.70	\$27.00	-\$2.70
1.00	\$30.00	\$30.00	\$0.00
1.01	\$30.30	\$30.00	-\$0.30
1.02	\$30.60	\$30.00	-\$0.60
1.03	\$30.90	\$30.00	-\$0.90
1.04	\$31.20	\$30.00	-\$1.20
1.05	\$31.50	\$30.00	-\$1.50

Verifying a scale division is virtually impossible. For a Class II device the accuracy requirement is approximately 0.01% of applied load. If the division is 0.1 g, then the required accuracy is ± 0.00001 g and we are trying to measure that with a resolution of 0.1 g. In addition, we don't have standards below 1 mg.

I contend that e is not the digit to the left of the differentiated d ! Nor do we verify e . Careful reading of the definition of the verification scale division “ e ” in Appendix D will reveal no direct connection between e and the indications on the instrument being verified. The verification scale division is a mass (weight) value declared by the manufacturer in required markings that is used in classifying instruments and in specifying tolerances for the device. In the header to column 2 in Table 3., we find the expression “Verification Scale Divisions (d or e^1). This is another chance to misunderstand the Code. The verification scale division must be e according to the definition. It can't be d , although it can have the same value as d . Similarly, reading Note 1 in Table 3, you might conclude that e is the value of the digit immediately to the left of d . The critical distinction is that e is a value of that digit and not the actual division of the display. To avoid confusion, I propose amending Table 3. to simply direct you to the scale markings to find e and remove any reference to the digit in the display.

The e value is also used in classifying instruments in the Scales Code. Classes refer to relative error ranges. This comes from the ratio $MTol / e$. At the second step in the tolerance structure in Table 6. Under HB44 a Class III instrument is $\sim 0.1\%$ accurate. This is $2e$ tolerance for a load of 2,000 e . A Class II instrument is accurate to $\sim 0.01\%$, or $2e$ error for a load of 20,000 e . However, the tolerances within a class are stepped, such that the % error varies through the operating range. For Class II the relative errors are 0.02% at 5,000 e , 0.01% at 20,000 e and 0.0033% at 100,000 e . The manufacturer decides what class and relative accuracy he needs to serve (based on capacity and n) and designs accordingly.

If e is not a division on the instrument, what is it? In R76, the basis of our current Scales Code, the term “scale” is not used to refer to a weighing instrument, but rather the graduations or divisions, i.e., the “scale” of indication. Thus, a scale division is not limited to weighing devices. A register on an LMD has a “scale division,” e.g., a RMFD typically indicates in 0.001 gal divisions of scale. It should be easy to see the 0.001 gal increments correspond to d in the Scales Code. When we verify the RMFD, we use a test measure with an independent scale, either 1 in³ for older measures and 0.5 in³ for newer measures. The “verification scale” for the RMFD is therefore the “scale” on the test measure used to determine the true value. The instrument scale and the verification scale connect at only one point, at ZERO! Error arises when the two scale diverge as you move along the measurement scale due to linearity errors, influence factors, random variations, etc., within the instrument. The Verification Scale is considered to have no error.

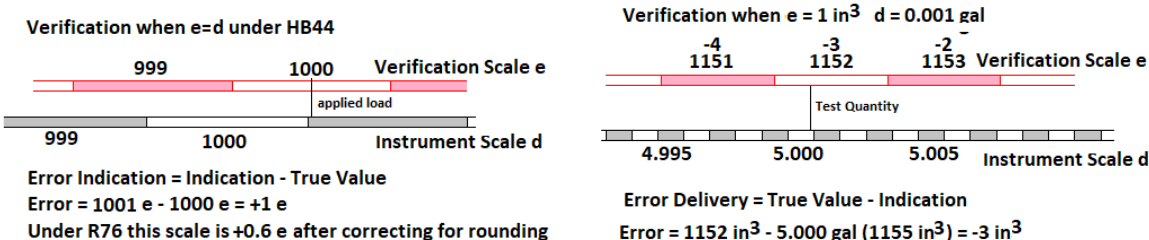
Classification when $e = d$ Classification when $e = 1 \text{ in}^3$ $d = 0.001 \text{ gal}$ 

Above at left, the graphic shows a case where $e = d$. Notice how the divisions d and e both begin at center zero and the divisions align perfectly because at this magnification it is impossible to see small differences. The test evaluates

the sum of many divisions in order to see any deviation. Above at right, the graphic shows how the 1 in^3 e for the RMFD verification aligns with the 0.001 gal d of the instrument. Now imagine what happens when a test is performed.

Classification is based on relative error. This allows the verification scale division to differ from the instrument scale division, sometimes larger and sometimes smaller. With the RMFD above right, d is significantly smaller than e. In fact, the 6 e maintenance tolerance is 25 d. The two scales are independent. Would anyone suggest that the d smaller than e is inappropriate for commercial use. We verify the RMFD to e just like the weighing instrument with $e = 10 \text{ d}$. The confusion comes from the requirement to differentiate d on these instruments.

Why does the Code require d to be differentiated when d is smaller than e? That is the critical question. It is not because d is somehow inaccurate or unreliable. It is not because d is smaller than the e of the tolerances. I believe it is because the code wanted to ensure that the serviceperson or official did not use d for tolerance calculations. It had nothing to do with users or customers.



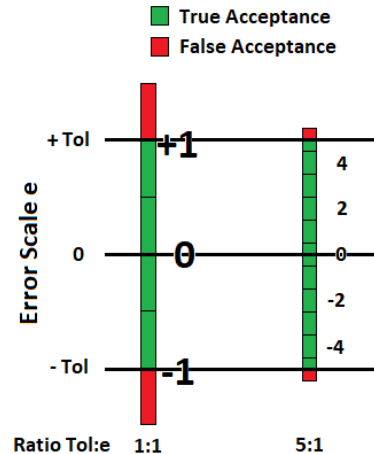
In the above graphics, the instrument scale diverges from the verification scale. They both started at the same zero reference. Notice that the RMFD at right calculates delivery error vs indication error at left. The key is to understand that the verification scale has no error and we are measuring the deviation of the instrument scale from the verification scale.

This pattern holds true for other verification tests, from tests of packaged goods with a reference scale to tests of taximeters on a road course. Circling back to the proposed definition of true value, in addition to its use in classifying scales, **the verification scale is that "scale" used to measure the true value. The division of that "true value" measurement scale is "e."** With the new G-T.3. that true value is the legal basis of our tests and is known without uncertainty. A table of a variety of verifications and their d and e scales are provided below.

Instrument & quantity	Instrument scale division d	Verification scale division e	Maintenance Tolerance	Ratio MT/e
RMFD @ 5 gal	0.001 gal	1 in^3 0.5 in^3	6 in^3	6 12
VTM @ 100 gal	0.1 gal	5 in^3	$\sim 70 \text{ in}^3$	14
Rack @ 1,000gal	1 gal	0.1 gal	3 gal	30
Mass Flow Class 0.3	$\leq 0.2\% \text{ MMQ}$	$\leq 0.02\%$	0.3%	15
Taximeter @ 1 mi	0.2 mi	$\sim 0.001 \text{ mi}$ (!5 ft)	$+0.01/-0.04 \text{ mi}$	10/40
Package Checking @ 1 lb @ 4 oz	N/A N/A	$\leq 0.005 \text{ lb}$ $\leq 0.002 \text{ lb}$	0.044 lb 0.016 lb	8.8 8
III scale $e = d$ @ 200 d	1 d	$1 \text{ e} = 1 \text{ d}$	2 e	2
III scale $e = d$ @ 2,000 d	1 d	$1 \text{ e} = 1 \text{ d}$	2 e	2
II scale $e = d$ @ 20,000 d	1 d	$1 \text{ e} = 1 \text{ d}$	2 e	2
II scale $e = 10 \text{ d}$ @ 20,000 e	1 d	$1 \text{ e} = 10 \text{ d}$	2 e	2

The last column of the table is the real focus of verification. We want to have sufficient resolution in determining errors. Although the issue is a bit more complicated, this ratio is a measure of the effectiveness of the verification. Special notes:

- For the RMFD, VTM, and Rack instruments the ratio is limited by HB105-3 and the specified minimum division of the prover scale. This becomes part of the code when you specify the prover must meet that specification.
- For the mass flow instruments the Notes provide no guidance on the verification scale division. I submit the value of resolution in error should be in HB44 Notes for all Codes, similar to R76 for weighing instruments. This is something I hope the work group on alternative test methods addresses. The EPO does specify the reference scale division be no larger than 1/10 of the smallest tolerance applied. This means the Mass Flow code requires a minimum ratio of 15:1 for maintenance tolerance which I believe is overkill and very costly. Compare to 5:1 elsewhere.
- For scales the ratio is only 2:1 as currently written in Handbook 44. There is no mention of error weights in the Code. In R76, the ratio is specified in that it requires errors to be determined to at least 0.2 e. This produces a ratio of 5:1 in the first step, 10:1 in step two and 15:1 in step three. If you determine errors to 0.1 e, as we do normally with error weights, it allows you to double those ratios and provide 10:1 in the first step. Reading the errors in d when $e = 5d$ or $e = 10d$, allows you to meet the minimum without using error weights (or expanded resolution).



Why use maintenance tolerance in computing this ratio? In verification, there is a shift in emphasis relative to calibration. In verification, your primary concern is with the population. You want all the devices in the same commercial field to have performance that is similar enough to promote equity. Even if you are little sloppy in applying acceptance tolerance, the instrument is highly likely to perform within maintenance tolerances. In calibration, the focus is always on a single artifact or instrument.

Why is this resolution in determining errors important? The short answer is to reduce the incidence of false acceptance/rejection. The Range of False Acceptance (RFA) can be defined as the portion of the compliant measured error that reaches outside the tolerance limits due to rounding in the error calculation. Limiting the RFA is the objective in specifying the resolution of errors.

When we use direct reading in testing weighing instruments the ratio of Tol:e in the first tolerance step is 1:1 and we have an RFA of $\frac{1}{2}e$ in proportion to the 1 e tolerance. The RFA is 50% of the tolerance, meaning we can accept instruments in error up to 1.5 times the tolerance. When we add the R76 requirement to measure errors to 0.2 e we increase the ratio of Tol:e to 5:1 and thereby reduce the RFA to 0.1 e in proportion to the 1 e maintenance tolerance (see graphic at right). This RFA is only 10% of the tolerance. Statistically, it can be shown that the RFA contributes to the population variability based on the Root Sum Square. At $\frac{1}{2}e$ RFA when Tol:e is 1:1, the population variability gets increased by 22%. When we increase the Tol:e ratio to 5:1 the population variation is only increased by 1%, which is not considered significant.

A better way to express this in is terms of compliance rate. Imagine your test data shows compliance of a class of devices as 95% at 1 e tolerance, but you are testing using direct reading. Due to rounding in measuring the error that you are not addressing, 95 % of the instruments are actually within 1.22 e and not the 1.00 e indicated in the compliance data. By increasing the Tol:e ratio to 5:1, 95% of the instruments are accurate within 1.01 e.

2020 NCWM Interim Meeting: The Committee acknowledged written comments from the submitter and heard comments during the open hearing session on this item. Mr. Constantine Cotsoradis (Flint Hills Resources) and Mr. Russ Vires (SMA) representing interests from an industry perspective questioned the need for the changes being proposed in this block of items. Additional comments from regulatory officials indicated that the changes included in

this proposal were not successful in clarifying HB44 requirements and possibly added to any confusion that exists. Mr. Steve Cook (CA, retired) pointed out that the changes ignored weighing devices that did not fall under Accuracy Class I or II and stated his willingness to work with the submitter to further develop the proposal.

Several other comments heard during open hearings indicated that it is questionable to include all of the individual items that are shown as part of Block 2. Comments from SMA, and some regulatory officials recommended that this Block of items be separated since not all items now grouped under Block 2 seem to be closely related. Mr. Kurt Floren (Los Angeles Co., CA) also pointed out that some of the proposed amended language is not clear and will add to confusion in interpretation of requirements and that there are some editorial corrections and proper formatting needed in this proposal as well.

NIST OWM commented that while most of the proposed changes seem to be fundamentally sound, the urgent need to implement some of those proposed changes is not clear. OWM also agreed with other comments that recommend separating the items under Block 2 into individual items or grouped together where items are more clearly related. OWM notes that item SCL-20.2 now included in Block 2 is clearly related to two other items individually listed on the S&T Committee's agenda: SCL-20.10 and SCL-20.11. Additionally, OWM believes that the determination if individual Scales Code requirements are meant to apply to either "e" or "d" should be carefully considered on a case-by-case basis. Also recommended was that additional input be solicited from stakeholders (industry officials and device manufacturers in particular) prior to adopting any changes based on this proposal.

During the Committee's work session, they agreed that some of the items combined under Block 2 should be separated. The Committee agreed that items GEN-20.1, SCL-20.1, and SCL-20.2 should be removed from Block 2 and given individual consideration. Considering items individually, the Committee agreed to the following:

- Item GEN-20.1: The Committee acknowledged the receipt of comments from some of the regional associations concerning the use of the term "True Value" in the formulas included in parts (a) & (b) and how it is defined in the proposal. The Committee agreed that there may be value in further defining the application of tolerance and that the item should be given a Developing status adding that consideration should be given to amending the use of the term "True Value."
- Item SCL-20.1: There were no direct comments regarding this item during open hearings. The Committee reviewed NIST OWM's analysis on this item and agreed it should be withdrawn noting this proposed change is unnecessary.
- Item SCL-20.2: During open hearings this item was discussed relative to items SCL-20.10 and SCL-20.11 which address the same issue. Most comments received were in favor of option 2 in this proposal which was effectively the same as SCL-20.10. The Committee agreed this item should also be withdrawn.
- Items SCL-20.3: The Committee agreed items SCL-20.4, SCL-20.5, SCL-20.6, SCL-20.7, and SCL-20.8 should be grouped together as Block 2 and given an Assigned status.

NCWM 2020 Annual Meeting: Due to the 2020 Covid-19 pandemic, this meeting was adjourned to January 2021, at which time it was held as a virtual meeting. Due to constraint of time, only those items designated as 2020 Voting Items were addressed. All other items were addressed in the subsequent 2021 NCWM Interim Meeting.

NCWM 2021 Interim Meeting: The Committee heard comments on this item during the open hearing session including the following.

Mr. John Barton (NIST OWM) stated that as a member of the Task Group assigned to this item, that group met on several occasions over the past 4 months to deliberate on the issues involved in this proposal. While the Task Group came to conclusions that are included in the final report, there had been other individuals and groups that came to different conclusions on those issues. Those other individuals and groups included subject matter experts, NTEP evaluators, scale manufacturers, and the NTEP Weighing Sector. Mr. Barton further stated that given the impact of changes proposed in this item, it may be wise to include additional sources of input prior to adopting the recommended changes.

It was also noted that the Committee set a date of November 15, 2023 for the Task Group to return its conclusions and that the Task Group finalized its work in a matter of 4 months rather than using the 3 years granted. It is also significant to note that the Task Group requested an Informational status for this item as opposed to a Voting status. This suggests that the Task Group is open to the notion that the proposal could be vetted further even when they have generated a “final” report on their work.

Mr. Henry Opperman (Weights and Measures Consulting) referred to the written comments he submitted to the Committee prior to this meeting and stated that all individual items in this Block should be withdrawn. Mr. Opperman stated that the proposals in this Block are based on false premises and therefore should not be adopted. Mr. Alan Walker (FL) agreed with Mr. Opperman and stated this proposal should be withdrawn also.

During the committee’s work session, the Committee considered updating the charge to the TG to direct that group to specifically identify each change recommended in the final report to actual changes proposed as amendments in HB 44. The Committee also recommends this remains as an assigned item.

NCWM 2021 Annual Meeting: At the request of the Task Group Chair, the Committee elevated the status of this item from Assigned to the task group to Informational.

NCWM 2022 Interim Meeting: Rick Harshman (NIST) recommended that the Task Group provide the committee with its recommendations in the form of an updated item under consideration. NIST also provided the committee with written comments. Doug Musik (Task Group Chair) spoke to the changes the task group had made that were in Appendix A of the publication and recommended sending it back to the Task Group. Russ Vires (SMA) supports the development of the item and recommended the following changes;

SCL-20.4: Table 3, footnote 1: note to discuss e not equal to d

SCL-20.6: “d” in parathesis () should be struck out

SCL-20.7: table 6 added SCL-20.8: scales may have verification internal e not equal to scale division “D”

Matt Douglas (California, Division of Measurement Standards) recommended accepting the changes from SMA. Charlie Stutsman (KS) recommended sending the item back to the Task Group.

The Committee agreed the item should be assigned back to the Task Group and that the item be refined and submitted to the conference.

Regional Associations’ Comments:

WWMA 2021 Annual Meeting: Matt Douglas (California - DMS): the language is not clear, recommend that this item be withdrawn. (the whole block). Russell Vires (Scale Manufactures Association): this is a carryover item. SMA supports further development of this item, recommend that the SMA encourage the use of term: Verification Scale Interval for (e) and Scale Division for (d). (he can send info.) States that his comments are the same from the Annual meeting. Diane Lee (NIST OWM): NIST OWM comments on this item are posted on NCWM website

The WWMA S&T Committee recommends that this item remain informational with concern given to the comments given during the WWMA open hearings. During the Committee work session, clarification was given regarding Committee member Matt Douglas’ (California - DMS) testimony questioned whether or not the item provides assistance to an Inspector in the field in the performance of their job.

SWMA 2021 Annual Meeting: Russ Vires, SMA, supports further development of this item, and recommended the descriptive name changes for “e” and “d” as posted on the NCWM website.

This committee recommends this item move forward with an Assigned status.

CWMA 2021 Interim Meeting: Lou Straub-SMA supports item. Would like to see it written that “scale division” will have value of “d” and “verification scale interval” for “e”.

CWMA S&T Committee recommends that item be assigned back to the Verification Scale Division Task Group.

NEWMA 2021 Interim Meeting: Rick Harshman (NIST OWM) recommends keeping this item in informational status due to the fact that the National S&T Committee has taken ownership and interpretations have been provided at NTEP and weighing sector meetings. Meeting notes are available on NCWM website. Henry Opperman (Weights and Measures Consulting) objected to many of the blocked items and recommend to keep this item in informational status. Lou Staub (SMA) suggested the use of the term “verification scale interval” for “e” and “scale division” for “d”. John McGuire (New Jersey)- Recommends keeping the item in informational status.

The NEWMA Specifications and Tolerances Committee recommends that this item be kept in Informational Status.

NEWMA Report: B2: SCL-20.8
Regional recommendation to NCWM on item status: <ul style="list-style-type: none"> <input type="checkbox"/> Recommend as a Voting Item on the NCWM agenda <input type="checkbox"/> Recommend as an Information Item on the NCWM agenda <input checked="" type="checkbox"/> Recommend as an Assigned Item on the NCWM agenda (To be developed by an NCWM Task Group or Subcommittee) <input type="checkbox"/> Recommend as a Developing Item on the NCWM agenda (To be developed by source of the proposal) <input type="checkbox"/> Recommend Withdrawal of the Item from the NCWM agenda (In the case of new proposals, do not forward this item to NCWM) <input type="checkbox"/> No recommendation from the region to NCWM (If this is a new proposal, it will not be forwarded to the national committee by this region)
Comments and justification for the regional recommendation to NCWM: (This will appear in NCWM reports) Mr. Russ Vires (SMA) recommended striking the following from the proposal: “Scales manufacturers are permitted to design scales where the value of verification scale division e differs from the displayed scale division d”. With the proposed changes to SCL-20.4, this would avoid duplication within the code.

Additional letters, presentation and data may have been submitted for consideration with this item. Please refer to <https://www.ncwm.com/publication-16> to review these documents.

BLOCK 3 ITEMS (B3) TOLERANCES FOR DISTANCE TESTING IN TAXIMETERS AND TRANSPORTATION NETWORK SYSTEMS

Source:

New York Department of Agriculture and Markets

Purpose:

Provide the same distance-measurement tolerances for the Taximeters Code and Transportation Network Systems Code.

B3: TXI-20.1 D T. Tolerances

Item Under Consideration:

Amend Handbook 44, Taximeters Code as follows:

T. Tolerances

T.1. Tolerance Values.

T.1.1. On Distance Tests. – Maintenance and acceptance tolerances for taximeters shall be as follows:

(a) On Overregistration: 1 % of the interval under test **when the distance is 1.6 km (1 mile) or less, 2.5 % of the interval under test when the distance is greater than 1.6 km (1 mile).**

NEWMA Report: B3: TXI-20.1
Regional recommendation to NCWM on item status: <ul style="list-style-type: none"> <input type="checkbox"/> Recommend as a Voting Item on the NCWM agenda <input type="checkbox"/> Recommend as an Information Item on the NCWM agenda <input type="checkbox"/> Recommend as an Assigned Item on the NCWM agenda (To be developed by an NCWM Task Group or Subcommittee) <input checked="" type="checkbox"/> Recommend as a Developing Item on the NCWM agenda (To be developed by source of the proposal) <input type="checkbox"/> Recommend Withdrawal of the Item from the NCWM agenda (In the case of new proposals, do not forward this item to NCWM) <input type="checkbox"/> No recommendation from the region to NCWM (If this is a new proposal, it will not be forwarded to the national committee by this region)
Comments and justification for the regional recommendation to NCWM: (This will appear in NCWM reports)
Mr. Jim Willis (NY) has submitted some updated language and asks that this item continue to be developing. After hearing comments from the floor, the committee recognized the need to further develop this block and recommended the block retain developing status.

B3: TNS-20.1 D T. Tolerances

Item Under Consideration:

Amend Handbook 44, Transportation Network Systems Code as follows:

T. Tolerances

T.1.1. Distance Tests. – Maintenance and acceptance tolerances shall be as follows:

(a) On Overregistration: ~~2.5%~~ **1 % of the interval under test when the distance is 1.6 km (1 mile) or less, 2.5 % of the interval under test when the distance is greater than 1.6 km (1 mile).**

(b) On Underregistration: ~~2.5 %~~ **4 % of the interval under test.**

Background/Discussion:

This item has been assigned to the submitter for further development. For more information or to provide comment, please contact:

Mr. Jim Willis
 New York Department of Agriculture and Markets
 518-485-8377, james.willis@agriculture.ny.gov

Taximeter manufacturers are submitting devices identical to the devices in the Transportation Network Measurement Systems code; however, they are faced with a tighter tolerance for over-registration. Both devices are typically computer pads or cell phones. Taximeter companies want to take advantage of some of the same technology used by TNMS companies, however, the tolerance for taximeters is much tighter than the tolerance for TNMS meters. During type evaluation, it is common to drive more than 1 mile to incorporate tunnels and valley effect. If the same tolerance was applied, taximeters would have the same chance of passing as TNMS meters.

Some jurisdictions that test taximeters may not want the tolerance for a 1-mile course to be raised given the good history of their test programs. This is the reason I am proposing maintaining the 1% tolerance at 1 mile or less.

Some TNMS companies may be concerned that their device will not pass a 1% tolerance, but we believe that on a straight, 1-mile course, devices operating properly should have no problem passing.

NCWM 2020 Interim Meeting: The Committee heard from NIST OWM explaining that the proposal is not technically correct by inserting language that refers to “intervals” in the tentative HB 44 TNMS Code. These types of systems do not calculate a charge for fare using intervals (i.e., segments) of the total travel in a trip as do taximeters. TNMS calculate fare charges based on the entire distance/time in a trip. Additionally, these two different systems (taximeters and TNMS) are becoming more similar and the differences that were used to distinguish them from one another are beginning to fade. OWM noted there is a need for the USNWG on Taximeters that developed the tentative TNMS Code to meet and discuss the potential of a merger of these two HB 44 Codes. Mr. Kurt Floren (Los Angeles Co., CA) pointed out that taximeters have been and still are meeting existing tolerances and therefore he questions the need to expand those tolerance values.

Mr. Stan Toy (Santa Clara Co., CA) expressed his belief that the tolerances for taximeters do not need to be expanded and that this item should be Withdrawn. Mr. Jim Willis (NY) pointed out that New York Weights and Measures has issued its own type approval for taximeters that use location services such as GPS to measure distance. Mr. Willis stated further that NY would support a Developing or Assigned status.

During the Committee’s work session, it was agreed to assign a Developing status with the understanding the USNWG on Taximeters has offered to assist the submitter in further development of the proposal.

NCWM 2020 Annual Meeting: Due to the 2020 Covid-19 pandemic, this meeting was adjourned to January 2021, at which time it was held as a virtual meeting. Due to constraint of time, only those items designated as 2020 Voting Items were addressed. All other items were addressed in the subsequent 2021 NCWM Interim Meeting.

NCWM 2021 Interim Meeting: Mr. John Barton (NIST OWM) stated that OWM noted issues of concern in this proposal during the 2020 NCWM Interim Meeting regarding how tolerances are applied to taximeters in contrast to how they are applied to TNMS. This proposal does not seem to recognize these differences. OWM also notes the many opposing comments made pertaining to the increase of tolerances for taximeters which have complied with existing tolerances for decades. The NIST USNWG on Taximeters has been conducting meetings with a goal of merging the HB 44 Taximeters and TNMS Codes. This work will include a number of modifications to both codes that will affect the specifications, test procedures, user requirements, and possibly the tolerances. The USNWG has offered to work with the submitter of this proposal.

Mr. Willis representing the submitter of this item stated a willingness to work the USNWG on Taximeters.

During the committee’s work session, the members noted the submitter’s willingness to work with the taximeter work group and agreed to maintain this item’s Developing status.

Comments in Favor:

Regulatory:

- A regulator from New York presented current edits of the proposal at the time of his comments. These edits were not published in Publication 15 and when presented during open hearings, membership was unable to view the content due to the projected size on the screen and on online screens. The commenter stated that many taxis operate with a GPS based systems and are still categorized as a taxi meter due to the nature of their business and this would provide the same tolerances for similar technology. Recommends revised version move forward as Voting status.

Industry:

- No Comments

Advisory:

- No Comments

Comments Against:**Regulatory:**

- A regulator from Los Angeles County, CA commented this may set a dangerous precedence and noted the same requirements should apply to similar devices, regardless of design or technology used. Recommends withdraw.
- A regulator from California DMS commented there is no justification for increasing the tolerances for equipment already meeting the requirements. Recommends withdraw.

Industry:

- No Comments

Advisory:

- An advisory member representing NIST OWM commented on the expansion of tolerances and noted that taximeters have a long-standing history showing these devices can meet these established tolerances. The commenter recommends the submitter work on the proposal and engage in efforts to merge the taximeter and TNMS codes with the USNWG. It was also stated the USNWG has this item on their agenda for further discussion. Recommends the proposal be further developed with the assistance of the USNWG.

Neutral Comments:**Regulatory:**

- No Comments

Industry:

- No Comments

Advisory:

- No Comments

Item Development:

NCWM 2022 Interim Meeting: The Committee assigned a developing status for this item at the 2022 Interim Meeting. The committee recommends the submitter work with the USNWG on this proposal. As noted in open hearings this is an item on the USNWG agenda and there may be efforts on the way to address this issue by other means.

Regional Associations' Comments:

WWMA 2021 Annual Meeting: Kurt Floren (LA County): This coincides with previous comments: new tech with GPS tracking and network companies are out. We are now taking age-old tech that's meeting 1% tolerance and proposing to expand the tolerance. (existing equipment has been meeting with no issues). He does not support this item until the data has been evaluated. He recommends this item to remain developmental until more data is available.

The WWMA S&T Committee recommends the status remain developmental.

SWMA 2021 Annual Meeting: The committee heard no comments on this item. This committee recommends this item remain a Developing item so that the involved parties have more time to find a way to align the tolerances in the Handbook.

CWMA 2021 Interim Meeting: The committee heard comments from the floor. Diane Lee-NIST comments are in report on NCWM website. CWMA S&T Committee recommends the item move forward as a developing item.

NEWMA 2021 Interim Meeting: Jim Willis commented to explain the relationship of the two systems. Taxi Meters vs Transportation Network Systems and the different tolerances that are applied. The tolerances are different in the HB 44 and therefore when a taxi meter using satellite technology is used, the tolerance is tighter and therefore the playing field is not level. Lou Sakin (Hopkinton/Northbridge, MA) asked if industry has commented or questioned this procedure. Jim Willis (New York) was not aware at the time. Lou Sakin (Hopkinton/Northbridge, MA) further

commented that if the playing field is not level, then he recommends a voting status. Juana Williams (NIST OWM) commented and recommended that the submitter work with the work group to fully develop the code.

The NEWMA Specifications and Tolerances Committee recommends that this item be given Developing Status with continued involvement with the national Taxi Meter Work Group.

NEWMA Report: B3: TXI-20.1
<p>Regional recommendation to NCWM on item status:</p> <p> <input type="checkbox"/> Recommend as a Voting Item on the NCWM agenda <input type="checkbox"/> Recommend as an Information Item on the NCWM agenda <input type="checkbox"/> Recommend as an Assigned Item on the NCWM agenda <i>(To be developed by an NCWM Task Group or Subcommittee)</i> <input checked="" type="checkbox"/> Recommend as a Developing Item on the NCWM agenda <i>(To be developed by source of the proposal)</i> <input type="checkbox"/> Recommend Withdrawal of the Item from the NCWM agenda <i>(In the case of new proposals, do not forward this item to NCWM)</i> <input type="checkbox"/> No recommendation from the region to NCWM <i>(If this is a new proposal, it will not be forwarded to the national committee by this region)</i> </p>
<p>Comments and justification for the regional recommendation to NCWM: <i>(This will appear in NCWM reports)</i></p> <p>Mr. Jim Willis (NY) has submitted some updated language and asks that this item continue to be developing.</p> <p>After hearing comments from the floor, the committee recognized the need to further develop this block and recommended the block retain developing status.</p>

Additional letters, presentation and data may have been submitted for consideration with this item. Please refer to <https://www.ncwm.com/publication-16> to review these documents.

BLOCK 4 ITEMS (B4) ELECTRONICALLY CAPTURED TICKETS OR RECEIPTS

NOTE: The item under consideration reflects changes that were received by the committee from the submitter of the item and that the Committee agreed to during its 2021 Interim Meeting work session. The changes are highlighted.

Source:

Kansas Department of Agriculture, Division of Weights and Measures

Purpose:

Allow recorded values to be captured electronically as an alternative to a printed ticket or receipt.

B4: GEN-21.2 D G-S.5.6. Recorded Representations.

Item Under Consideration:

Amend Handbook 44, General Code as follows:

G-S.5.6. Recorded Representations. – Insofar as they are appropriate, the requirements for indicating and recording elements shall also apply to recorded representations. All recorded values shall be **printed provided presented** digitally. In applications where recorded representations are required **by a specific code**, the customer may be given the option of not receiving the recorded representation. **Unless otherwise specified, recorded representations referenced in specific codes shall be made available to the customer as a minimum in hard copy form.** However, for systems equipped with the capability of issuing an electronic receipt, ticket, or other recorded representation, the customer may be given the option to receive any required information electronically (e.g., via cell phone, computer, etc.) in lieu of or in addition to a hard copy.

(Amended 1975, 2014 and **20XX**)

B4: LMD-21.2 D S.1.6.5. Money Value Computations., UR.3. Use of a Device.

Item Under Consideration:

Amend Handbook 44, Liquid Measuring Devices Code as follows:

S.1.6.5. Money-Value Computations

...

S.1.6.5.6. Display of Quantity and Total Price, Aviation Refueling Applications.

(a) *The quantity shall be displayed throughout the transaction.*

(b) *The total price shall also be displayed under one of the following conditions:*

(1) *The total price can appear on the face of the dispenser or through a controller adjacent to the device.*

(2) *If a device is designed to continuously compute and display the total price, then the total price shall be computed and displayed throughout the transaction for the quantity delivered.*

(c) *The total price and quantity shall be displayed for at least five minutes or until the next transaction is initiated by using controls on the device or other customer-activated controls.*

(d) *A ~~printed~~ receipt shall be available and shall include, at a minimum, the total price, quantity, and unit price.*

[Nonretroactive as of January 1, 2008]

*(Added 2007) (**Amended 20XX**)*

S.1.6.7. Recorded Representations. – *Except for fleet sales and other price contract sales and for transactions where a post-delivery discount is provided, a ~~printed~~ receipt providing the following information shall be available through a built-in or separate recording element for all transactions conducted with point-of-sale systems or devices activated by debit cards, credit cards, and/or cash:*

*(a) the total volume of the delivery;**

*(b) the unit price;**

*(c) the total computed price;**

(d) the product identity by name, symbol, abbreviation, or code number; and*

*(e) the dispenser designation by either an alphabetical or numerical description.***

**[Nonretroactive as of January 1, 1986] **[Nonretroactive as of January 1, 2021]*

*(Added 1985) (Amended 1997, 2012, 2014, 2018 and **20XX**)*

S.1.6.8. Recorded Representations for Transactions Where a Post-Delivery Discount(s) is Provided. – *Except for fleet sales and other price contract sales, a ~~printed~~ receipt providing the following information shall be available through a built-in or separate recording element that is part of the system for transactions involving a post-delivery discount:*

- 1 (a) the product identity by name, symbol, abbreviation, or code number;
- 2 (b) transaction information as shown on the dispenser at the end of the delivery and prior to any post-delivery
- 3 discount(s), including the:
 - 4 (1) total volume of the delivery;
 - 5 (2) unit price; and
 - 6 (3) total computed price of the fuel sale.
- 7 (c) an itemization of the post-delivery discounts to the unit price;
- 8 (d) the final total price of the fuel sale after all post-delivery discounts are applied; and
- 9 (e) *the dispenser designation by either an alphabetical or numerical description.*
- 10 *[Nonretroactive as of January 1, 2021]*
- 11 (Added 2012) (Amended 2014, ~~and~~ 2018, and 20XX)

12 ...

13 **UR.3. Use of a Device**

14 ...

15 **UR.3.3. Computing Device** – Any computing device used in an application where a product or grade is
16 offered for sale at one or more unit prices shall be used only for sales for which the device computes and displays
17 the sales price for the selected transaction.

18 (Became retroactive 1999)

19 (Added 1989) (Amended 1992)

20 The following exceptions apply:

- 21 (a) Fleet sales and other price contract sales are exempt from this requirement.
- 22 (b) A truck stop dispenser used exclusively for refueling trucks is exempt from this requirement provided
- 23 that:
 - 24 (1) all purchases of fuel are accompanied by a ~~printed~~ receipt of the transaction containing the
 - 25 applicable price per gallon, the total gallons delivered, and the total price of the sale; and
 - 26 (Added 1993)
 - 27 (2) unless a dispenser complies with S.1.6.4.1. Display of Unit Price, the price posted on the dispenser
 - 28 and the price at which the dispenser is set to compute shall be the highest price for any transaction
 - 29 which may be conducted.
 - 30 (Added 1993)
- 31 (c) A dispenser used in an application where a price per unit discount is offered following the delivery is
- 32 exempt from this requirement, provided the following conditions are satisfied:
 - 33 (1) the unit price posted on the dispenser and the unit price at which the dispenser is set to compute
 - 34 prior to the application of any discount shall be the highest unit price for any transaction;

(Amended 2014)

(2) all purchases of fuel are accompanied by a receipt recorded by the system. The receipt shall contain:

- a. the product identity by name, symbol, abbreviation, or code number;
- b. transaction information as shown on the dispenser at the end of the delivery and prior to any post-delivery discount including the:
 1. total volume of the delivery;
 2. unit price; and
 3. total computed price of the fuel sale prior to post-delivery discounts being applied.
- c. an itemization of the post-delivery discounts to the unit price; and
- d. the final total price of the fuel sale.

(Added 2012) (Amended 2014)

(Added 1989) (Amended 1992, 1993, 2012, ~~and 2014~~, and 20XX)

UR.3.4. ~~Printed Ticket, Recorded Representation.~~ – The total price; the total volume of the delivery; the price per liter or gallon; *and a corresponding alpha or numeric dispenser designation** shall be ~~shown, either printed recorded~~ by the device ~~or in clear hand script~~, on any ~~printed ticket issued by a device and recorded representation~~ containing any one of these values and shall comply with G-S.5.6. Establishments where no product grades are repeated are exempt from the dispenser designation requirement.

**[Nonretroactive as of January 1, 2021]*

(Amended 2001, 2018, ~~and 2019~~, and 20XX)

B4: VTM-21.1 D S.1.1. Primary Elements., UR.2. User Requirements

Item Under Consideration:

Amend Handbook 44, Vehicle Tank Meter Code as follows:

S.1.1. Primary Element

S.1.1.1. General. – A meter shall be equipped with a primary indicating element. ~~and may also be equipped with a primary recording element.~~ Except for systems used solely for the sale of aviation fuel into aircraft and for aircraft-related operations, a meter shall be equipped with a primary recording element.

(Amended 1993 and 20XX)

Note: ~~Except for systems used solely for the sale of aviation fuel into aircraft and for aircraft related operations, vehicle tank meters shall be equipped with a primary recording element as required by paragraph UR.2.2. Ticket Printer; Customer Ticket, Recorded Representation~~

(Amended 1993 and 20XX)

...

S.1.4.2. ~~Printed Ticket, Recorded Representation.~~ – If a computing-type device issues a ~~printed ticket recorded representation~~ which displays the total computed price, the ~~ticket recorded representation~~ shall

~~also have printed clearly thereon record~~ the total quantity of the delivery, the appropriate fraction of the quantity, and the price per unit of quantity.
(Amended 1989, **and 20XX**)

UR.2. User Requirements.

UR.2.2. ~~Ticket Printer, Customer Ticket~~ Recording Element. – Vehicle-Mounted metering systems shall be equipped with ~~a ticket printer which shall be used for~~ **means to record** all sales where product is delivered through the meter **and shall comply with G-S.5.6.** A copy of the ticket issued by the device shall be ~~left with~~ **provided to** the customer at the time of delivery or as otherwise specified by the customer.
(Added 1993) (Amended 1994, **and 20XX**)

B4: LPG-21.1 D S.1.1. Primary Elements., UR.2. User Requirements

Item Under Consideration:

Amend Handbook 44, LPG and Anhydrous Ammonia Liquid-Measuring Devices Code as follows:

S.1.1. Primary Elements.

S.1.1.1. General. – A meter shall be equipped with a primary indicating element and may also be equipped with a primary recording element.

Note: Vehicle-mounted metering systems shall be equipped with a primary recording element as required by paragraph UR.2.6. ~~Ticket Printer, Customer Ticket~~ **Recorded Representation**
(Amended 20XX)

S.1.1.6. ~~Printed Ticket, Recorded Representation~~ – Any ~~printed ticket issued~~ **recorded representation created** by a device of the computing type ~~on which there is printed~~ **includes** the total computed price, shall ~~have printed clearly also include~~ thereon the total volume of the delivery in terms of liters or gallons, and the appropriate decimal fraction of the liter or gallon, and the corresponding price per liter or gallon.
(Added 1979) (Amended 1987, **and 20XX**)

S.1.5.5. Recorded Representations for Transactions Where a Post-Delivery Discount(s) is Provided. – Except for fleet sales and other price contract sales, a ~~printed receipt~~ **recorded representation** providing the following information shall be available through a built-in or separate recording element that is part of the system for transactions involving a post-delivery discount:

- (a) the product identity by name, symbol, abbreviation, or code number;
- (b) transaction information as shown on the dispenser at the end of the delivery and prior to any post-delivery discount(s), including the:
 - (1) total volume of the delivery;
 - (2) unit price; and

(3) total computed price of the fuel sale.

(c) an itemization of the post-delivery discounts to the unit price; and

(d) the final total price of the fuel sale after all post-delivery discounts are applied.

(Added 2016) (**Amended 20XX**)

...

UR.2. User Requirements.

...

UR.2.6. ~~Ticket Printer, Customer Ticket. Recorded Representation~~– Vehicle-Mounted metering systems shall be equipped with ~~a ticket printer which shall be used for~~ **means to record** all sales where product is delivered through the meter **and shall comply with G-S.5.6.** A copy of the ~~ticket-recorded representation~~ issued by the device shall be ~~left with~~ **provided to** the customer at the time of delivery or as otherwise specified by the customer.

(Added 1993²) (Amended 1994, **and 20XX**)

...

UR.2.7.2. Computing Device. – Any computing device used in an application where a product or grade is offered for sale at one or more unit prices shall be used only for sales for which the device computes and displays the sales price for the selected transaction. The following exceptions apply:

(a) Fleet sales and other price contract sales are exempt from this requirement.

(b) A truck stop dispenser used exclusively for refueling trucks is exempt from this requirement provided that:

(1) all purchases of fuel are accompanied by a ~~printed receipt~~ **recorded representation** of the transaction containing the applicable price per unit of measure, the total quantity delivered, and the total price of the sale; and

(2) unless a dispenser complies with S.1.5.1. Display of Unit Price, the price posted on the dispenser and the price at which the dispenser is set to compute shall be the highest price for any transaction which may be conducted.

(c) A dispenser used in an application where a price per unit discount is offered following the delivery is exempt from this requirement, provided the following conditions are satisfied:

(1) the unit price posted on the dispenser and the unit price at which the dispenser is set to compute shall be the highest unit price for any transaction;

(2) all purchases of fuel are accompanied by a receipt recorded by the system for the transaction containing:

a. the product identity by name, symbol, abbreviation, or code number;

b. transaction information as shown on the dispenser at the end of the delivery and prior to any post-delivery discount including the:

1. total volume of the delivery;

2. unit price; and
3. total computed price of the fuel sale prior to post-delivery discounts being applied.
- c. an itemization of the post-delivery discounts to the unit price; and
- d. the final total price of the fuel sale after all post-delivery discounts are applied.

(Added 2016) (Amended 20XX)

B4: CLM-21.1 D S.1.4.1. ~~Printed Ticket~~Recorded Representation., UR.2.6.3. ~~Printed Ticket~~Recorded Representation.

Item Under Consideration:

Amend Handbook 44, Cryogenic Liquid-Measuring Devices Code as follows:

S.1.4.1 ~~Printed Ticket~~ Recorded Representation – Any ~~printed ticket~~ **recorded representation** issued by a device of the computing type on which ~~there is printed~~ **includes** the total computed price, shall ~~have printed clearly thereon~~ also **include** the total quantity of the delivery, and the price per unit.

(Amended 20XX)

And

UR.2.6.2. ~~Tickets or Invoices. Recorded representation~~ – Any ~~written invoice, or printed ticket, recorded representation~~ based on a reading of a device that is equipped with an automatic temperature or density compensator shall have shown thereon that the quantity delivered has been adjusted to the quantity at the NBP of the specific cryogenic product or the equivalent volume of gas at NTP.

(Amended 20XX)

UR.2.6.3. ~~Printed Ticket. Recorded Representation.~~ – Any ~~printed ticket issued~~ **recorded representation** **provided** by a device of the computing type on which ~~there is printed~~ **includes** the total computed price, the total quantity of the delivery, or the price per unit, shall also ~~show~~ **include** the other two values. ~~(either printed or in clear hand script).~~ **and shall comply with G-S.5.6.**

(Amended 20XX)

B4: MLK-21.1 D S.1.4.2. ~~Printed Ticket~~ Recorded Representation., UR.2.6.3. ~~Printed Ticket~~Recorded Representation.

Item Under Consideration:

Amend Handbook 44, Milk Meter Code as follows:

S.1.4.2. ~~Printed Ticket~~ Recorded Representation – If a computing-type device issues a ~~printed ticket~~ **recorded representation** which ~~displays~~ **includes** the total computed price, the ~~ticket~~ **recorded representation** shall ~~also have printed clearly thereon~~ **include** the total quantity of the delivery, the appropriate fraction of the quantity, and the price per unit of quantity.

(Amended 1989, and 20XX)

UR.2.2. ~~Printed Ticket. Recorded Representation.~~ – Any ~~printed ticket issued~~ **recorded representation** **created** by a device of the computing type on which ~~there is printed~~ **includes** the total computed price, the total quantity, or the price per unit of quantity, shall also ~~show~~ **include** the other two values ~~(either printed or in clear hand script).~~ **and shall comply with G-S.5.6.**

(Amended 1989 and 20XX)

**B4: MFM-21.2 D S.6. ~~Printer~~Recorded Representations., UR.2.6. ~~Ticket Printer, Customer~~
~~Ticket, Recorded Representation., UR.3.4. Printed Ticket, Recorded~~
~~Representation.~~**

Item Under Consideration:

Amend Handbook 44, Mass Flow Meter Code as follows:

S.6. ~~Printer. Recording Element~~ – When an assembly is equipped with means for ~~printing~~recording the measured quantity, the following conditions apply:

- (a) the scale interval shall be the same as that of the indicator;
- (b) the value of the ~~printed~~ recorded quantity shall be the same value as the indicated quantity;
- (c) *the ~~printed~~ recorded quantity shall also include the mass value if the mass is not the indicated quantity;*
[Nonretroactive as of January 1, 2021]
- (d) a quantity for a delivery (other than an initial reference value) cannot be recorded until the measurement and delivery has been completed;
- (e) the ~~printer~~ recording element is returned to zero when the resettable indicator is returned to zero; and
- (f) the ~~printed~~ recorded values shall meet the requirements applicable to the indicated values.

(Amended 2016, and 20XX)

S.6.1. ~~Printed Receipt~~ Recorded Representations. – ~~Any~~ When a quantity is delivered, ~~printed~~ quantity the recorded representation shall include an identification number, the time and date, and the name of the seller. This information may be printed by the device or pre-printed on the ticket.

(Amended 20XX)

And

UR.3.3 ~~Ticket Printer, Customer Ticket, Recorded Representation.~~ – Vehicle-Mounted metering systems shall be equipped with ~~a ticket printer which shall be used for~~ means to record all sales where product is delivered through the meter and shall comply with G-S.5.6. A copy of the ~~ticket~~ recorded representation issued by the device shall be ~~left with~~ provided to the customer at the time of delivery or as otherwise specified by the customer.

(Added 19934) (Amended 20XX)

...

UR.3.4. ~~Printed Ticket, Recorded Representation.~~ – The total price, the total quantity of the delivery, and the price per unit shall be ~~printed~~ provided on any ~~ticket~~ recorded representation issued by a device of the computing type and containing any one of these values.

(Added 1993) (Amended 20XX)

**B4: CDL-21.1 D S.1.4.1. ~~Printed Ticket~~Recorded Representations., UR.2.4.2. ~~Tickets or~~
~~Invoices. Recorded Representation.~~**

Item Under Consideration:

Amend Handbook 44, Carbon Dioxide Liquid-Measuring Devices Code as follows:

S.1.4.1. ~~Printed Ticket. Recorded Representation~~ – Any ~~printed ticket recorded representation~~ issued by a device of the computing type ~~on~~ which ~~there is printed~~ includes the total computed price shall ~~have printed clearly thereon~~ also include the total quantity of the delivery and the price per unit.

(Amended 20XX)

UR.2.4.2. ~~Tickets or Invoices Recorded Representation~~, – Any ~~written invoice or printed ticket recorded representation~~ based on a reading of a device that is equipped with an automatic temperature or density compensator shall ~~have shown thereon~~ include that the quantity delivered has been temperature or density compensated.

(Amended 20XX)

B4: HGM-21.1 D S.2.6. Recorded Representations, Point of Sale Systems., S.6. Printer. Recording Element., UR.3.2. Vehicle-mounted Measuring Systems Ticket Printer Recording Element., UR.3.3. Printed Ticket. Recorded Representation.

Item Under Consideration:

Amend Handbook 44, Hydrogen Gas-Measuring Devices Code as follows:

S.2.6. Recorded Representations, Point of Sale Systems. – A ~~printed~~ receipt shall be available through a built-in or separate recording element for transactions conducted with point-of-sale systems or devices activated by debit cards, credit cards, and/or cash. The ~~printed~~ receipt shall contain the following information for products delivered by the dispenser:

- (a) the total mass of the delivery;
- (b) the unit price;
- (c) the total computed price; and
- (d) the product identity by name, symbol, abbreviation, or code number.

(Amended 20XX)

...

S.6. ~~Printer. Recording Element~~ – When an assembly is equipped with means for ~~printing-recording~~ the measured quantity, the ~~printed recorded~~ information must agree with the indications on the dispenser for the transaction and the ~~printed recorded~~ values shall be clearly defined.

(Amended 20XX)

S.6.1. ~~Printed Receipt. Recorded Representation~~ – ~~Any~~ When a quantity is delivered, printed quantity the recorded representation shall include an identification number, the time and date, and the name of the seller. ~~This information may be printed by the device or pre-printed on the ticket.~~

(Amended 20XX)

And

UR.3.2. Vehicle-mounted Measuring Systems ~~Ticket Printer~~ Recording Element.

(Amended 20XX)

UR.3.2.1. ~~Customer Ticket Recording Element~~, – Vehicle-Mounted metering systems shall be equipped with ~~a ticket printer which shall be used for~~ means to record all sales where product is delivered through the device and shall comply with G-S.5.6. A copy of the ~~ticket recorded representation~~ issued by the

device shall be ~~left with~~ provided to the customer at the time of delivery or as otherwise specified by the customer.

(~~Amended 20XX~~)

...

UR.3.3. ~~Printed Ticket. Recorded Representation.~~ – The total price, the total quantity of the delivery, and the price per unit shall be ~~printed~~ provided on any ~~ticket~~ recorded representation issued by a device of the computing type and containing any one of these values.

(~~Added 1993~~) (~~Amended 20XX~~)

B4: OTH-21.2 D Appendix D - Definitions.: recorded representations, recording element.

Item Under Consideration:

Amend Handbook 44, Appendix D - Definitions as follows:

recorded representation. – The printed, embossed, electronic, or other representation that is recorded as a quantity, unit price, total price, product identity or other information required by a weighing or measuring device. [1.10, 2.20, 2.21, 2.22, 2.24, 2.25, 3.30, 3.31, 3.32, 3.33, 3.34, 3.35, 3.36, 3.37, 3.38, 3.39, 3.40, 5.54, 5.55, 5.56(a), 5.56(b), 5.57, 5.58, 5.60]

recording element. – An element incorporated in a weighing or measuring device by means of which ~~its~~ the device's performance relative to quantity or money value is permanently recorded ~~electronically or~~ on a tape, ticket, card, or the like, in the form of a printed, stamped, punched, or perforated representation or recorded electronically in instances where that option is permitted by specific code. [1.10, 2.20, 2.21, 2.22, 2.24, 2.25, 3.30, 3.31, 3.32, 3.33, 3.34, 3.35, 3.36, 3.37, 3.38, 3.39, 3.40, 5.54, 5.55, 5.56(a), 5.56(b), 5.57, 5.58, 5.60]

Previous Action:

- 2021: Developing Items

Original Justification:

In 2014 G-S.5.6. was added to Handbook 44 to allow for the issuance of electronic receipts. At that time the use of the term “print”, and all variations on the word “print” was not fully addressed.

The Oxford Dictionary defines print as “a mechanical process involving the transfer of text, images, or designs to paper.”

The Oxford Dictionary defines record as: to “set down in writing or some other permanent form for later reference, especially officially.”

Values that are delivered via electronic means are recorded values and not necessarily printed values. Printed indicates that a value has been transferred on to a hard document. While the intent of the 2014 amendment was to allow for the use of electronic receipts the terminology used is incorrect. In addition to receipts, there are instances where other information may be transmitted electronically.

When applying G-A.2. to weighing and measuring devices,

G-A.2. Code Application. – *This General Code shall apply to all classes of devices as covered in the specific codes. The specific code requirements supersede General Code requirements in all cases of conflict.*
(Amended 1972),

Multiple conflicts arise in the implementation of the 2014 Amendment of G-S.5.6. This is to clarify the terminology in Handbook 44 and to recognize the changing technology in how transactions are recorded, and the information is disseminated.

Item Development:

This item has been assigned to the submitter for further development. For more information or to provide comment, please contact:

Mr. Charles Stutesman
Kansas Department of Agriculture
785-564-6683 charles.stutesman@ks.gov

NOTE: The proposal as it appeared in the 2021 Interim Meeting agenda is available at <https://www.ncwm.com/interim-archive>.

Comments in Favor:

Regulatory:

- 2021 Interim: Mr. Charles Stutesman (KS), submitter of the item, agreed that the item should be developing and noted that updates to the item under consideration were provided to the S&T Committee based on reviews that he had with NIST, OWM.
- 2021 Annual: Mr. Charles Stutesman (KS) looks forward to maintaining developing status between now and Interim. When electronic receipt provision was put in GC, it works well but specific codes supersede. All the sections in this block have printer requirements. The goal was not to remove printers but to add the option for electronic receipts if customer wants it. He would appreciate comments on how to clean up the proposal.
- 2022 Interim: The submitter of the item commented the item needs editing and further work before voting. Recommends the item remain developing.
- 2022 Interim: A regulator from California DMS recommends the item remain developing.

Industry:

- 2021 Interim: Mr. Dmitri Karimov (MMA) commented that the proposed changes to recognize electronically captured tickets are needed, editorial corrections are needed to some parts of the proposal, and he agreed with a developing status for this item.
- 2022 Interim: A member of industry representing MMA commented general support with some edits to the language and supports further development.
- 2022 Interim: A member of industry representing SMA supports the item, as it recognizes the importance of providing flexible options for recorded representations to customers and sees value in the item as developing.

Advisory:

- 2021 Interim: Ms. Diane Lee (NIST OWM) commented that there are two proposed changes to HB 44, Mass Flow Meter Code, Paragraph U.R.3.3 in the 2021 Interim Agenda. One proposal is Block 4 MFM-21.2 UR.3.3. (which was incorrectly number as UR.2.6 in the item under consideration in the 2021 Interim Meeting agenda) and the other is item MFM-21.1. UR.3.3. on the 2021 Interim Meeting agenda. The submitters should work together to provide one proposed change.
- 2022 Interim: An advisory member representing NIST OWM agrees with the need to address current language in the proposal and supports development.

Comments Against:

Regulatory:

- 2022 Interim: No comments heard.

Industry:

- 2022 Interim: No comments heard.

Advisory:

- 2022 Interim: No comments heard.

Neutral Comments:

Regulatory:

- 2022 Interim: No comments heard.

Industry:

- 2022 Interim: No comments heard.

Advisory:

- 2022 Interim: No comments heard.

Item Development:

NCWM 2022 Interim Meeting: The Committee assigned a developing status for this item at the 2022 Interim Meeting. The committee supports the work and recommends the continued work with all stakeholders. For more information or to provide comment, please contact:

Mr. Charles Stutesman
Kansas Department of Agriculture
785-564-6683 charles.stutesman@ks.gov

NOTE: The proposal as it appeared in the 2021 Interim Meeting agenda is available at <https://www.ncwm.com/interim-archive>.

Regional Associations' Comments:

WWMA 2021 Annual Meeting: Matt Douglas (California - DMS): California supports further development of the block. Russell Vires (SMA): SMA supports 2 of the items GEN-21.2, OTH-21.2. Diane Lee (NIST OWM): carryover item. NIST has comments on this item posted. They support it as a developing item going forward.

The WWMA S&T Committee recommends the status remain developmental. The Committee recommends that the submitter continue to work with NIST OWM to further develop the item.

SWMA 2021 Annual Meeting: Russ Vires, SMA, stated that he supports this item. Tim Chesser, State of Arkansas, suggested changing the wording in Gen 21.1. His suggestion is to change "presented" to "available".

This committee recommends this item remain Developing, so they have an opportunity to work with the NIST OWM to clarify and clean up the language.

CWMA 2021 Interim Meeting: Charles Stutesman-Kansas (submitter) mentioned that he hoped to have more information to NCWM Interim Meeting and supported this item staying as developing. Diane Lee-NIST stated there are comments on this item in OWM's Analysis that was sent to the committee. Supports this item as developing. Lou Straub-SMA supports OTH-21.2.

CWMA S&T Committee recommends item as developing.

NEWMA 2021 Interim Meeting: Jim Willis (New York) commented that it is important to recognize that the future will bring us to electronically captured tickets or receipts. Lou Straub SMA, John McGuire (New Jersey), and Jim Willis (New York) all recommended to move this item forward as voting.

The NEWMA Specifications and Tolerances Committee recommends that this item be given Voting Status.

NEWMA Report: B4: GEN-21.2
Regional recommendation to NCWM on item status: <ul style="list-style-type: none"> <input type="checkbox"/> Recommend as a Voting Item on the NCWM agenda <input type="checkbox"/> Recommend as an Information Item on the NCWM agenda <input type="checkbox"/> Recommend as an Assigned Item on the NCWM agenda (To be developed by an NCWM Task Group or Subcommittee) <input checked="" type="checkbox"/> Recommend as a Developing Item on the NCWM agenda (To be developed by source of the proposal) <input type="checkbox"/> Recommend Withdrawal of the Item from the NCWM agenda (In the case of new proposals, do not forward this item to NCWM) <input type="checkbox"/> No recommendation from the region to NCWM (If this is a new proposal, it will not be forwarded to the national committee by this region)
Comments and justification for the regional recommendation to NCWM: (This will appear in NCWM reports)
<p>Mr. Russ Vires (SMA) rose in support of GEN-21.2 and OTH-21.2. He commented that he supports the option for electronic receipts and tickets, and recognizes the need to provide options for consumers. No other comments were heard on this block.</p> <p>After hearing comments from the floor, the committee recognized the need to further develop this block and recommended the block retain developing status.</p>

Additional letters, presentation and data may have been submitted for consideration with this item. Please refer to <https://www.ncwm.com/publication-16> to review these documents.

ITEM BLOCK 5 (B5) DEFINE “FIELD REFERENCE STANDARD”

NOTE: In 2019 this block of items was combined with Block 1 “Terminology For Testing Standards” and other items that addressed terminology for standards and the use of “master meters.” Based on comment heard during the 2021 Annual Meeting, the S&T Committee recommended that all items that were included in Block 1 “Terminology For Testing Standards” that originally appeared as a separate item or a separate block of items on the S&T agenda prior to 2019, be removed from Block 1 “Terminology For Testing Standards” and appear as originally presented.

Item Block 5 “Define “Field Reference Standard”” was removed from Block 1 “Terminology For Testing Standards” and now appears as a separate block of items on the 2022 Interim Meeting agenda.

Source:

Endress + Hauser Flowtec AG USA (2018)

Purpose:

Add definition field reference standard meter to HB 44. Delete transfer standard definition. Change terms in sections 3.34, 3.38 and 3.39.

B5: CLM-18.2 W N.3.2. Transfer Standard Test and T.3. On Tests Using Transfer Standards

Item Under Consideration:

Amend Handbook 44, Cryogenic Liquid-Measuring Devices Code as follows:

N.3.2. ~~Field Reference Transfer~~ Standard Meter Test. – When comparing a meter with a calibrated field reference transfer standard meter, the test draft shall be equal to at least the amount delivered by the device in two minutes at its maximum discharge rate, and shall in no case be less than 180 L (50 gal) or equivalent thereof. When testing uncompensated volumetric meters in a continuous recycle mode, appropriate corrections shall be applied if product conditions are abnormally affected by this test mode.

(Amended 1976 ~~and 20XX~~)

T.3. On Tests Using ~~Field Reference Transfer Standards Meters~~. – To the basic tolerance values that would otherwise be applied, there shall be added an amount equal to two times the standard deviation of the applicable field reference transfer standard meter when compared to a basic reference standard. (Added 1976)

B5: CDL-18.2 W N.3.2. Transfer Standard Test and T.3. On Tests Using Transfer Standards

Item Under Consideration:

Amend Handbook 44, Carbon Dioxide Liquid-Measuring Devices Code as follows:

N.3.2. ~~Field Reference Transfer~~ Standard Meter Test. – When comparing a meter with a calibrated field reference transfer standard meter, the test draft shall be equal to at least the amount delivered by the device in two minutes at its maximum discharge rate.

(Amended 20XX)

T.3. On Tests Using ~~Field Reference Transfer Standards Meters~~. – To the basic tolerance values that would otherwise be applied, there shall be added an amount equal to two times the standard deviation of the applicable field reference transfer standard when compared to a basic field reference reference standard meter.

B5: HGM-18.2 W N.4.1. Master Meter (Transfer) Standard Test and T.4. Tolerance Application on Test Using Transfer Standard Test Method

Item Under Consideration:

Amend Handbook 44, Hydrogen Gas-Measuring Devices Tentative Code as follows:

N.4.1. ~~Field Reference Master Meter (Transfer)~~ Standard Meter Test. – When comparing a measuring system with a calibrated field reference transfer standard meter, the minimum test shall be one test draft at the declared minimum measured quantity and one test draft at approximately ten times the minimum measured quantity or 1 kg, whichever is greater. More tests may be performed over the range of normal quantities dispensed.

(Amended 20XX)

T.4. Tolerance Application on Test Using ~~Field Reference Transfer Standard Meters Test Method~~. – To the basic tolerance values that would otherwise be applied, there shall be added an amount equal to two times the standard deviation of the applicable field reference transfer standard meter when compared to a basic reference standard.

B5: OTH-18.3 W Appendix D – Definitions: field reference standard meter and transfer standard

Item Under Consideration:

Amend Handbook 44, Appendix D as follows:

field reference standard meter – A measurement system designed for use in proving and testing measuring devices and meters.

~~transfer standard — A measurement system designed for use in proving and testing cryogenic liquid measuring devices.~~

Background/Discussion:

These items have been assigned to the submitter for further development. For more information or to provide comment, please contact:

Mr. Michael Keilty
Endress + Hauser Flowtec AG USA
970-586-2122, michael.keilty@us.endress.com

During S&T open hearings discussion in July 2017 it was pointed out that the term transfer standard which is used in the proposal to amend HB44 3.37 N.3 and 3.32 N.3 Test Drafts is incorrect. The statement made also suggested that the use of transfer standard is incorrectly used in HB44 code sections 3.34, 3.38 and 3.39. It was suggested that a more appropriate term to use is field reference standard or field reference standard meter. There is no definition in OIML G18 which supports the use of the term transfer standard. There is suggestive basis to support reference standard as it is used textually in OIML G18.

NIST has no procedural documents in place to justify the revision with a definition. The definition of transfer standard is used in code sections 3.34, 3.38 and 3.39 and that those sections do not need to change.

Committee received written comments on all items in Block 4 and Block 5, as well as LPG-4 and MFM-2 emphasizing the need for there to be more study and discussion of the issues to assess the ramifications of all the proposed changes. The Committee also received written comments from the SMA that it looks forward to further information on these items and stating that it is important to be consistent in our use of terms across multiple sections of NIST Handbook 44. The Committee agreed to carryover this group of items on its 2019 agenda to allow for further discussion and development of these proposals.

NCWM 2019 Interim Meeting: The S&T Committee decided to combine the items on the agenda dealing with the issue of transfer standard (including items already combined into blocks) into one block. Block 1 (New) of the Interim Meeting report now includes Gen-3, Block 1 (original items from the 2019 interim agenda that appeared under Block 1), Block 2, LPG-3, and MFM-5, which were all separate items and blocks of items on the S&T Committee's 2019 Interim Meeting agenda (NCWM Publication 15). Agenda items Gen-3, Block 1, Block 2, LPG-3, and MFM-5 are listed separately on the Interim agenda with a note added beneath each individual item referring the reader to the New B1 items. All items under this New B1 have retained the same numbering system for ease in referring to the appendix for discussion on each item.

NCWM 2019 Annual Meeting: Mr. Brett Gurney (NCWM Chairman) commented regarding the formation of a Task Group assigned to further develop this block proposal. The TG is charged with providing definitions for various types of standards (transfer, field, reference, etc.) as well as the criteria to be met by these types of standards. The completion date given to the TG is July 2021. The Committee agreed to the Assigned status for this block of items and looks forward to hearing updates from the TG. the Chair of the task group was:

Mr. Jason Glass
Kentucky Department of Agriculture
502-573-0282, jason.glass@ky.gov

NCWM 2020 Interim Meeting: Field Standard TG Chair Jason reported that the Task Group met prior to the Interim meeting and has begun discussion of the items under Block 1. Mr. Glass stated that bi-weekly teleconference meetings were scheduled and that the group was optimistic but had significant work to accomplish.

Mr. Russ Vires (SMA) supports the Scale item, SCL 18.1; in this block, Mr. Dimitri Karimov (Meter Manufacturers Association) supports the Task Group activities, Mrs. Tina Butcher was encouraged with the progress on terminology and provided an update on the Mass Flow Meter testing reporting that field testing was conducted October 28 to

November 1, 2019 and that State and Industry participation included Colorado, Florida, Oregon, Emerson, and Tulsa Gas Technology.

Mr. Kurt Floren (Los Angeles County, California) raised concerns with GEN-19.1. regarding the definition of “Standard, Field” and its reference to “stable” standards and how long a standard is expected to be stable, which is typically 1-year, for which he believes should be longer. Mr. Floren also questioned the statement in the definition “tested over a range of environmental and operational conditions that the measuring devices is used...” Mr. Floren noted that he was unsure if all laboratories will have the capabilities to test over this wide range of conditions. Mr. Floren also expressed concerns with the definition “Standard, Transfer” citing that this standard may not meet the fundamental considerations requirement for standards over a long period of time or wide range of environmental conditions.

Mr. Steve Harrington (Oregon) echoed Mr. Floren’s comments. Field Standard TG Chair Glass responded that these are concerns of the TG and these issues will be discussed and considered as the TG develops these items.

During the Committee’s work session, the Committee agreed that this item should remain an Assigned item.

NCWM 2021 Interim Meeting: NCWM Field Standard TG Chair, Jason Glass provided an update on the Task Group activities. Mr. Glass reported that the field standard Task Group is following the activities of the NIST Master Meter Project and that the Task Group reviewed API specifications for use of master meters as a standard and a test protocol that will be used to ensure uniformity in collecting data on master meters used as field standards. He also reported that the TG does not have a recommendation for this item. Mr. Glass also reported that he would be stepping down as the TG Chair. Mr. Mike Keilty (Endress+Hauser AG) thanked Chair Glass and the TG for their work and requested that Block 1, LPG-15.1, N.3. and Block 1 MFM-15.1, N.3 be removed from Block 1 items and to allow those items to move forward separate from the other Block 1 Items. Mr. Keilty stated that similar language was added to the Hydrogen code and that the proposed language in LPG-15.1 N.3. and MFM-15.1, N.3 will allow for the recognition of master meters as field standards. Mr. Henry Oppermann (WM-Consulting), stated that data is needed to ensure that master meters can be used over a range of conditions. Mr. Robert Murnane (Seraphin) stated that jurisdictions have the ability to use meters and that Block 1 LPG-15.1, N.3 and Block 1 MM-15.1, N.3 should remain in Block 1 until data is available to support the use of master meters as a standard. Mr. Keilty mentioned that there has been useful dialog regarding master meters in the TG, but that he is concerned that the TG is not close to deciding and he expressed concerns with the TG’s focus on the NIST Master Meter Project. Mrs. Tina Butcher (NIST OWM) provided an update on the NIST Master Meter Project and noted that States have the regulatory powers to accept or reject a standard. She also mentioned that NIST is working with States to collect data needed to assess master meters and preliminary testing was conducted and data was collected on CNG at Tulsa Gas Technology’s facility in fall 2019. Ms. Diane Lee (NIST OWM) noted that NIST OWM feels that it is premature to add more language to the Handbook 44 on master meters without data to support its use.

During the Committee’s work session, the Committee agreed to keeps all items in Block 1 and that this item should remain with an Assigned status.

NCWM 2021 Annual Meeting: Mr. Glass reported that he would be stepping down as the Field Standard TG Chair. The Committee heard updates from members of the Task Group during open hearings. Mr. Michael Keilty noted that two of the items had been on the agenda since 2015 and requested that they be removed from the block and recommended recognizing the use of master meters. Other comments were to keep the items together until data is analyzed from the NIST Field Reference Standard Work Group to support the use of master meters but that if some items were removed from the block, all items should be removed from the block. Based on comments heard during the 2021 Annual Meeting, the S&T Committee recommended that all items that were included in Block 1 “Terminology For Testing Standards” that originally appeared as a separate item or a separate block of items on the S&T agenda in and prior to 2019, be removed from Block 1 “Terminology For Testing Standards” and appear as originally presented.

During the 2021 Committee work session the Committee recognized that the Task Group has accomplished all it is able to at this point and is recommending the Task Group be disbanded and will make said recommendation to the NCWM Chairman. The Committee agreed to break all items in Block 1 into individual items and designate them all as Developing. The Committee thanks the Task Group and its members for their work.

NCWM 2022 Interim Meeting: Mr. Michael Keilty (the submitter of the items) provided written comments to the committee requesting that the block of items be withdrawn. Mr. Keilty also requested during the open hearing that these items be withdrawn. Ms. Diane Lee (NIST) agreed with the submitter and recommended that the items be withdrawn.

During the S&T Committee work session, the committee agreed to recommend this item for withdrawal.

Regional Association Comments:

WWMA 2021 Annual Meeting: Michael Keilty (Endress + Hauser) : he submitted these in 2017, sept. in response to NIST comments. NIST committed a form 15 in that same year with the language from Block 1. He had hoped that the task group formed in 2019 would have addressed block 1 and 5 items. Lang. in block 5 is in line with (LPG-15.1 and MFM-15.1). Language in documents was copied and inserted. asks committee to look at language specific to the item and not the general block. Kurt Floren (LA County) : last reference was to block 5, error. Michael Keilty (Endress + Hauser) : Would like to move from developing to a voting status in the 2022 cycle. Bob Murnane (Seraphin) : new terminology that does not exist in HB currently. The definition proposed is vague. It does not limit the tolerance for field standard. W/M officials needs to know that enforcement is legally enforceable. HB44 recognizes use of transfer standards and their uncertainty exceeds the 1/3. Several companies have proposed that mass flow meters be used. NIST is collecting data to evaluate Coriolis meter to possibly use as a field standard. it would be wrong to recognize Coriolis meter as a field standard (and that is what this is doing) without the proper tests. Doesn't think we need new terminology. the existing terms (transfer standard / field standard) be worked on. Recommends that this item be withdrawn. Josh Nelson (Ex-Officio NCWM S&T Committee) : Question: can he submit to the committee his notes? He will. Recommend entire block be withdrawn? Bob Murnane (Seraphin) : Yes (in reference to above testimony), withdraw entire block. Michael Keilty (Endress + Hauser) : to follow up on Bob: these were not submitted to undermine the 1/3 tolerance. It is just assumed that the device will perform and the data will be provided. This is just enabling language.

The WWMA S&T Committee recommends the status remain developmental. The Committee recommends that items MFM-15.1 and LPG-15.1 be inserted into Block 5 items as they refer to the same terminology in HB:44. A letter was submitted to the Committee by Bob Murnane (Seraphin) and will be posted to the NCWM website.

SWMA 2021 Annual Meeting: Mr. Keilty, Endress + Hauser, who is the submitter of this item, stated that he hoped the Field Standard Task Group would have worked on Blocks 1 and 5, but, unfortunately, that was not the case. He recommended this item be Withdrawn. Russ Vires, Mettler Toledo, recommended the Withdrawal of this item. Mr. Oppermann, Weights and Measures Consulting, Seraphin, supports Withdrawal of this item.

This committee recommends this item be Withdrawn at the submitters request.

CWMA 2021 Interim Meeting: Michael Keilty-Endress+Hauser Flow (submitter) recommends that item be withdrawn.

CWMA S&T Committee recommends that item be withdrawn.

NEWMA 2021 Interim Meeting: Michael Keilty (Endress + Hauser Flowtec) has submitted comments and is requesting withdrawal of the items in this block. Further comments were heard from Juana Williams (NIST OWM) on the history of the item. Comments were received in support of withdrawal.

The NEWMA Specifications and Tolerances Committee recommends Withdrawal of this item.

Additional letters, presentation and data may have been submitted for consideration with this item. Please refer to <https://www.ncwm.com/publication-16> to review these documents.

BLOCK 6 ITEMS (B6) COMMERCIAL AND LAW ENFORCEMENT, AXLE AND AXLE GROUP WEIGHTS

Source:

NIST, Office of Weights and Measures

Purpose:

This proposed change is intended to add clarification regarding the implications of using weighing and measuring devices for transactions that may be considered by some as commercial while there is no clear guidance provided.

B6: SCL-22.1 D Recorded Representation of Axle or Axle Group Weights

Item Under Consideration: Amend NIST Handbook 44, Scales Code as follows:

S.1.14. Recorded Representations, Multi-Independent Platform¹ Vehicle Scale Systems

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

(a) the portion of the vehicle to which they represent (e.g., “axle-group 1, axle group 2, axle group 3,” or if using axle and axle group descriptions, “steering axle, drive axles, trailer axles”), or

(b) the particular independent scale platform from which they were obtained (e.g., “Platform 1, Platform 2, Platform 3”).

S.1.14.2. Total Vehicle Weight. – If a summed total of all axle and axle group loads of a vehicle weighed on a multi-independent platform vehicle scale system is recorded, the recorded value shall be clearly identified as:

(a) “Total Vehicle Weight,” “Vehicle Weight,” (or other similar terms that clearly identify the value as the vehicle’s total weight) providing all axle(s) and axle groups of the vehicle weighed were positioned on a live portion of the weighing/load-receiving elements and weighed simultaneously when the summed total was determined², or

(b) “Not-Legal-For-Trade” unless all axle and axle groups of the vehicle weighed were simultaneously positioned on a live portion of the weighing/load-receiving elements when the summed total was determined, or the vehicle was weighed using the alternative method described in footnote 2 of this paragraph.

¹Multi-independent platform means each platform of the scale is a single independent weighing/load-receiving element unattached to adjacent elements and with its own A/D conversion circuitry and displayed weight.

²Alternatively, the individual components of the vehicle being weighed may be uncoupled, positioned completely on the live elements of the scale, weighed separately, and then totaled.

[subsequent requirements to be renumbered as appropriate]

NEWMA Report: B6: SCL-22.1

Regional recommendation to NCWM on item status:

☐ Recommend as a Voting Item on the NCWM agenda

<input type="checkbox"/> Recommend as an Information Item on the NCWM agenda <input type="checkbox"/> Recommend as an Assigned Item on the NCWM agenda <i>(To be developed by an NCWM Task Group or Subcommittee)</i> <input checked="" type="checkbox"/> Recommend as a Developing Item on the NCWM agenda <i>(To be developed by source of the proposal)</i> <input type="checkbox"/> Recommend Withdrawal of the Item from the NCWM agenda <i>(In the case of new proposals, do not forward this item to NCWM)</i> <input type="checkbox"/> No recommendation from the region to NCWM <i>(If this is a new proposal, it will not be forwarded to the national committee by this region)</i>
Comments and justification for the regional recommendation to NCWM: <i>(This will appear in NCWM reports)</i> <p>Mr. Russ Vires (SMA) recommends Block 6 be broken into two separate items. Mr. Vires indicated his supports this item with the following language change: 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:. Ms. Tina Butcher (NIST OWM) commented that this item needs development.</p> <p>After hearing comments from the floor, the committee recognized the need to further develop this block and recommended the block retain developing status.</p>

B6: SCL-22.3 D UR.3.3. Single-Draft Vehicle Weighing., and UR.3.4. Axle and Axle Group Weight Values.

Item Under Consideration:

Amend Handbook 44, Scales Code as follows:

UR.3.3. Single-Draft Vehicle Weighing. – A vehicle or a coupled-vehicle combination shall be commercially weighed on a vehicle scale only as a single draft. That is, the total weight of such a vehicle or combination shall not be determined by adding together the results obtained by separately and not simultaneously weighing each end of such vehicle or individual elements of such coupled combination. However, the weight of:

(a) a coupled combination may be determined by uncoupling the various elements (tractor, semitrailer, trailer), weighing each unit separately as a single draft, and adding together the results; or

(b) a vehicle or coupled-vehicle combination may be determined by adding together the weights obtained while all individual elements are resting simultaneously on more than one scale platform.

~~**Note: This paragraph does not apply to highway law enforcement scales and scales used for the collection of statistical data.**~~
(Added 1992)

And

UR.3.4. Axle and Axle Group Weight Values. – Weight values of axles or axle groups of highway motor vehicles are necessary to verify compliance with highway weight limit enforcement. When a fee is charged for the use of an axle-load scale or vehicle scale to determine the weight of axles or axle-groups, the transaction is considered to be “commercial” as defined by General Code paragraph G-A.1. Commercial and Law Enforcement Equipment and the scale shall comply with all applicable requirements for commercial weighing systems.

When weight values for axles or axle groups are obtained using multiple-platform vehicle scales and where all parts of the motor vehicle are simultaneously resting on live elements of the scale, the weight values for axles or axle groups may be summed together to represent a commercial total gross weight of the motor vehicle. Weight values for axles or axle groups may also be summed to represent a commercial total gross

weight of the motor vehicle if the individual components are uncoupled, positioned completely on the live elements, and weighed separately on the scale.

Weight values of axles or axle groups obtained from these weighing devices as individual weighing operations where all parts of the motor vehicle are not simultaneously resting on live portions of the scale shall not be used in commercial transactions and may only be used to verify compliance with highway weight limits.

Renumber existing paragraphs UR.3.4 through UR.3.12.)

NEWMA Report: B6: SCL-22.3	
Regional recommendation to NCWM on item status:	
<input type="checkbox"/> Recommend as a Voting Item on the NCWM agenda <input type="checkbox"/> Recommend as an Information Item on the NCWM agenda <input type="checkbox"/> Recommend as an Assigned Item on the NCWM agenda <i>(To be developed by an NCWM Task Group or Subcommittee)</i> <input checked="" type="checkbox"/> Recommend as a Developing Item on the NCWM agenda <i>(To be developed by source of the proposal)</i> <input type="checkbox"/> Recommend Withdrawal of the Item from the NCWM agenda <i>(In the case of new proposals, do not forward this item to NCWM)</i> <input type="checkbox"/> No recommendation from the region to NCWM <i>(If this is a new proposal, it will not be forwarded to the national committee by this region)</i>	
Comments and justification for the regional recommendation to NCWM: (This will appear in NCWM reports)	
<p>Mr. Russ Vires (SMA) commented that the SMA supports the intent of the item but believes additional work is necessary. Ms. Tina Butcher (NIST OWM) commented that this item would describe the method of weighing as a service and OWM has suggested alternate language to keep UR.3.3, and leave the notes section, but eliminate the word "Note".</p> <p>After hearing comments from the floor, the committee recognized the need to further develop this block and recommended the block retain developing status.</p>	

Previous Action:

New

Original Justification:

OWM has noted a number of inquiries submitted to our office for explanation on the many and various issues involved with the use of weighing or measuring devices as commercial devices when there is charge for doing so. Law enforcement devices may be regulated in a different manner than commercial devices (e.g., allows highway weight limit enforcement through multi-draft weighing) when commercial devices are not allowed to be used in that way.

The submitter pointed out that there seems to be a difference in opinions regarding this practice constitutes a commercial transaction.

The submitter requested voting status for these items in 2022.

Comments in Favor:

Regulatory:

- Supported the language alignment of GEN 22.1 with L&R Block 2. Support for separating the blocked items.

Industry:

- SMA provided written comments and open hearing testimony that the items should be separated. Supports each item, but recommends changes to SCL 22.1

Advisory:

- NIST (submitter) recommended that GEN 22.1 be separated and given voting status. Asked that remainder of block remain developing.

Comments Against:

Regulatory:

-

Industry:

-

Advisory:

Neutral Comments:

Regulatory:

- SCL code sections could be reworded for easier understanding and comprehension of commercial vs. non-commercial.

Industry:

- Recommended that tickets should have identification of axle groups.

Advisory:

Item Development:

NCWM 2022 Interim Meeting: During the S&T Committee work session, the committee agreed to remove item GEN 22.1 from Block 6. The committee recommendations pertain to the remainder of the block only (SCL 22.1 & SCL 22.3). The committee received updated language from the submitter for item SCL 22.1.

This item has been assigned to the submitter for further development. For more information or to provide comment, please contact:

Mr. Richard Harshman
NIST Office of Weights and Measures
301-975-8107, richard.harshman@nist.gov

Regional Associations' Comments:

WWMA 2021 Annual Meeting: Kurt Floren (LA County): He wants to offer that the last part of subsection A and breaking into bullet points. He wants to break out equipment that is commercial, then the other types. It's titled commercial and law enforcement then "other commercial" and it becomes confusing. Is it all commercial and subject to our jurisdiction? rephrase GA-1: apply "to commercial equipment as follows: " ... explains that everything under is commercial. (strike "commercial" from A and B). Between apply and as in the first line, insert commercial equipment. Kurt Floren stated that he will submit a written statement to the Committee as presented during open hearings. Ivan Hankins (Iowa): He wants clarification as to what is being changed to make it better. It looks like it's already there, and he wants more definition on why this is changing. Cadence Matijevich (Nevada): Agrees with Kurt but cautions that we consider how the heading reads if we add commercial to the opening statement then there might be some interpretation that what is or is not commercial law enforcement equipment. (is there a fine assessed?) does not want to narrow the subsection of law enforcement devices only to commercial purposes. Kurt Floren (LA County): fix to Cadence Matijevich: restructure under GA-1: insert subsection under 1: commercial as follows, then insert A,B,C then 2 for law enforcement. Cadence Matijevich (Nevada) - states that Kurt is much better at this, and his fix is good. Lou Straub (Fairbanks Scales): agrees with Ivan, that the original language is satisfactory. Language needs to say that

its NTEP approved and meet handbook requirements. Eric Golden (Cardinal Scale): does a commercial transaction include just getting a weight: he says yes. Change the wording that that transaction is commercial. No suggestions at this time. Kurt missed a typo: in B2: "Basis." Tina Butcher (NIST OWM): their office submitted this. Wanted to clarify commercial transactions. Agrees with previous testimony. They have submitted other proposals to amend method of sale reg. and uniform law. They have determined that HB44 and 2 sections in HB130 are slightly different. Uniform Reg. for service persons also needs to be aligned. Wants this to remain developing so that they can continue to align the language and make it more uniform. Russell Vires (Scale Manufacturers Association): This is a new item, the SMA has not vetted this yet. They will do so at November meeting. This should remain developing so that there's no unintended consequences. Tina Butcher (NIST OWM): In the agenda, this is blocked with two other "companions". She feels that the block should continue, however, if others think that other items in the block are ready (SCL-22.1 and SCL-22.3) those items can move forward. Russell Vires (Scale Manufacturers Association): he is looking at it as a block and is commenting as an entire block. Wants all 3 to remain developing so that they can research. Lou Straub (Fairbank Scales): SCL-22.1: concern about the second sentence: talking about the entire truck on the scale = not legal for trade: this is ok. Second part about axle identifications (axle groups) this gets difficult to identify group notifications. Wants the ticket that has already been marked as not legal for trade to not have to identify all axels. Wants this re-worded. They will put down axle weight and gross weight. Preprinted labels don't allow enough space. Eric Golden (Cardinal Scales): agrees with Tina to split the items. "Blow the block apart." The second two items introduce additional items and topics. Wants to pull the second two items out.

The WWMA S&T Committee recommends that this be assigned a Developmental status. The Committee recommends following the submitter's request to remove GEN-22.1 from the Block. Based on testimony heard the Committee agreed to submit the following language for item GEN-22.1. The Committee notes that SCL-22.1 (UR.3.3.) item was reassigned as SCL-22.3.

G-A.1. Commercial and Law-Enforcement Equipment. – These specifications, tolerances, and other technical requirements apply as follows:

(1) To commercial weighing and measuring equipment

- (a) ~~To commercial weighing and measuring equipment; that is, to~~ To weights and measures and weighing and measuring devices commercially used or employed in establishing the size, quantity, extent, area, composition (limited to meat and poultry), constituent values (limited to grain), or measurement of quantities, things, produce, or articles for distribution or consumption, purchased, offered, or submitted for sale, ~~hire, or award, or in computing any basic charge or payment for services rendered on the basis of weight or measure.~~
- (Amended 2008 **and 20XX**)

- (c) **To other commercial weighing and measuring equipment:**
- i. when there is a fee assessed for the use of the equipment to determine a weight or measure;**
- ii. used to determine the bases of an award using count, weight, or measure; or**
- iii. used in computing any basic charge or payment for services rendered on the basis of weight or measure**
- (Added 20XX)**

- ~~(b)~~ (c) To any accessory attached to or used in connection with a commercial weighing or measuring device when such accessory is so designed that its operation affects the accuracy of the device.

- ~~(ed)~~ (2) To weighing and measuring equipment in official use for the enforcement of law or for the collection of statistical information by government agencies.

(These requirements should be used as a guide by the weights and measures official when, upon request, courtesy examinations of noncommercial equipment are made.)

SWMA 2021 Annual Meeting: Russ Vires, Mettler Toledo, stated that this item needs work on the wording and further review by stakeholders. Its current language could have unintended consequences, and recommended it continue with a Developing Status. This committee would like clarification on the purpose and use of axle weight scale values allowed by this proposal beyond law enforcement use.

This committee recommends that this item move forward with a Developing status.

CWMA 2021 Interim Meeting: Loren Minnich-Kansas suggested change he sent to the committee (in green).

B6: GEN-22.1 G-A.1. Commercial and Law-Enforcement Equipment. – These specifications, tolerances, and other technical requirements apply as follows:

- (a) To commercial weighing and measuring equipment; that is, to weights and measures and weighing and measuring devices commercially used or employed in establishing the size, quantity, extent, area, composition (limited to meat and poultry), constituent values (limited to grain), or measurement of quantities, things, produce, or articles for distribution or consumption, purchased, offered, or submitted for sale, ~~hire, or award, or in computing any basic charge or payment for services rendered on the basis of weight or measure.~~

(Amended 2008 and 20XX)

- (b) To other commercial weighing and measuring equipment:

i. when there is a fee assessed for the use of the equipment to determine a weight or measure;

ii. used to determine the bases of an award using count, weight, or measure when using weight, measure, or count as the basis to determine an award; or

iii. used in computing any basic charge or payment for services rendered on the basis of weight or measure

(Added 20XX)

Loren Minnich-Kansas also asked NIST for clarification on G-A.1. because different states already interrupt rule different ways. Diane Lee-NIST agreed with Loren and suggested it be developing. Eric Golden-Cardinal Scales agrees with the spirit of the proposal; it is indeed a “commercial transaction” to charge a person a fee solely for the purpose of obtaining a weight of a vehicle – it is not required to have to undergo a sales transaction of weighed product in order for it to be considered a commercial transaction. Eric also recommended striking out the following (in red) stating the reasoning behind this is by leaving the “non-commercial” language in the proposal, it defeats the purpose of the proposal, which is to officially clarify what a non-commercial transaction is.

B6: SCL-22.1 S.1.14. Recorded Representation of Axle or Axle Group Weights

S.1.14. Recorded Representation of Axle or Axle Group Weights. – The recorded representation of weights from individual axle or axle group weights shall clearly be identified as “not legal for trade” ~~or “non-commercial” weight values~~ unless the entire vehicle is positioned on live elements of a multiple-platform vehicle scale and where all axles/axle groups are weighed simultaneously. All recorded weights of axles/axle groups shall be identified as representing only a portion of the vehicle’s total gross weight (e.g., by axle groupings such as: “axle group 1,” “axle group 2,” “axle group 3,” or by individual axle description such as: “steering axle,” “drive axles,” “trailer axles”).

Any total gross weight of the vehicle included in the recorded representations determined by summing axle weights shall be clearly identified as “not-legal-for trade” ~~or “non-commercial”~~ unless those axle weights were recorded when all parts of the vehicle rested simultaneously on live portions of the scale, or the individual components were uncoupled, positioned completely on the live elements, and weighed separately on the scale.

Tina Butcher-NIST agreed G-A.1. needed more work and had no objection to Eric Golden suggestion of splitting SCL-22.1 and SCL-22.3. Lou Straub-Fairbanks says current G-A.1. is already correct. He also agreed with Eric Golden from Cardinal Scales on SCL 22.1. Doug Musick-Kansas agreed with Lou Straub. Says that item is not

practical for all vehicles out there. Keep as developing. Ivan Hankins-Iowa feels G-A.1. is already correct. Charles Stutesman-Kansas stated original language is good as written.

CWMA S&T Committee recommends that GEN 22.1 be withdrawn and SCL-22.1 and SCL 22.3 remain developing.

NEWMA 2021 Interim Meeting:

GEN-22.1

Rick Harshman (NIST OWM) commented that the language is in-need of some changes and NIST will be providing changes for the NCWM. Eric Golden (Cardinal Scale) supports the intent of this item, but it may need some wordsmithing. Lou Straub (SMA) Cheryl Ayer (New Hampshire) and John McGuire (New Jersey) all support this as a developing item.

SCL 22.1

Eric Golden (Cardinal Scale) supports this item moving forward as developing. Lou Straub (Fairbanks Scale) agrees with language in general. But questions the benefit of including all the language on a scale ticket and the large amount of information would be difficult to fit on the ticket. Eric Golden (Cardinal Scale) and Cheryl Ayer (New Hampshire) agree with comments from Mr. Straub. John McGuire (New Jersey) recommends keeping this item in developing status.

SCL 22.3r

Eric Golden (Cardinal Scale) suggested to strike “non-commercial” and additional wordsmithing to align with paragraph UR3.4. John McGuire (New Jersey) supports keeping this item in developing status.

The NEWMA Specifications and Tolerances Committee recommends that this item be given a Developing Status.

Additional letters, presentation and data may have been submitted for consideration with this item. Please refer to <https://www.ncwm.com/publication-16> to review these documents.

BLOCK 7 ITEMS (B7) TOLERANCES ON TESTS USING TRANSFER STANDARDS

Source:

Seraphin Test Measure Company, A Division of Pemberton Fabricators, Inc.

Purpose:

The purpose of these proposals is to change the language in the tolerance paragraphs that already specify that larger tolerances when a transfer standard is used, but that the OIML R117 Reduced MPE formula shall be used. Unless the proposed changes to 2021 S&T Agenda Block 1 Item GEN-19.1. are accepted, these proposals should not proceed.

B7: CLM-22.1 D T.3. On Tests Using Type 2 Transfer Standards.

Item Under Consideration:

Amend Handbook 44, Cryogenic Liquid-Measuring Devices Code as follows:

T.3. On Tests Using Type 2 Transfer Standards. – ~~To the basic tolerance values that would otherwise be applied, there shall be added an amount equal to two times the standard deviation of the applicable transfer standard when compared to a basic reference standard.~~ **When commercial meters are tested using a Type 2 transfer standard, the tolerance applied to the meter under test shall be calculated using the formula specified in the General Code Tolerance section.**

(Amended 202X)

B7: CDL-22.1 D T.3. On Tests Using Type 2 Transfer Standards.

Item Under Consideration:

Amend Handbook 44, Carbon Dioxide Liquid-Measuring Devices Code as follows:

T.3. On Tests Using Type 2 Transfer Standards. – ~~To the basic tolerance values that would otherwise be applied, there shall be added an amount equal to two times the standard deviation of the applicable transfer standard when compared to a basic reference standard.~~ When commercial meters are tested using a Type 2 transfer standard, the tolerance applied to the meter under test shall be calculated using the formula specified in the General Code Tolerance section.

(Amended 202X)

B7: HGM-22.1 D T.4. Tolerance Application on Tests Using Type 2 Transfer Standard Test Method.

Item Under Consideration:

Amend Handbook 44, Hydrogen Gas-Measuring Devices Code as follows:

T.4. Tolerance Application on Tests Using Type 2 Transfer Standard Test Method. – ~~To the basic tolerance values that would otherwise be applied, there shall be added an amount equal to two times the standard deviation of the applicable transfer standard when compared to a basic reference standard.~~ When commercial meters are tested using a Type 2 transfer standard, the tolerance applied to the meter under test shall be calculated using the formula specified in the General Code Tolerance section.

(Amended 202X)

Previous Action:

New

Original Justification:

In the codes mentioned above, when transfer standards are used, the basic tolerances to be applied to the devices under test are to be increased by the uncertainty of the transfer standard (i.e., two times the standard deviation of the transfer standard). The proposed changes incorporate the OIML R117 formula to state how the tolerance is to be increased when transfer standards are used. The formula effectively places an upper limit on how large the uncertainty associated with the transfer standard can be.

The current paragraphs already state that, when transfer standards are used, the tolerances are to be increased by two standard deviations for the repeatability of the transfer standard. One can argue that effect of the proposed changes is small and not necessary. The proposed changes are intended to provide consistency with the changes proposed in the amended proposals of 2021 S&T Agenda Block 1 Item GEN-19.1.

The submitter requested that this be a Voting Item in 2022.

Comments in Favor:

Regulatory:

-

Industry:

- Bob Murnane (Seraphin) explained the addition of “Type 2” term.

Advisory:

-

Comments Against:

Regulatory:

-

Industry:

- A revised version by Seraphin (submitter) was presented and made available on the NCWM website to properly align with GEN 19.1. The submitter requests that Block 7, Gen 19.1 and related item OTH 21.1 follow the same path moving forward.
- Dmitri Karimov (Liquid Controls) commented that the Block is linked to GEN 19.1 due to definition of Type 1 and 2 transfer standards. Mr. Karamov said it seems odd to single out Type 2. He explained T.1-3 restates what's in GEN 19.1 and recommends the Block to be withdrawn and GEN 19.1 move forward.

Advisory:

-

Neutral Comments:

Regulatory:

- Matt Douglas (California) recommends this Block and the associated items be given developing status.

Industry:

- Dmitri Karimov representing the Meter Manufacturers Association (MMA) stated that there was no consensus within the MMA.

Advisory:

- Diane Lee (NIST, OWM) who provided a brief overview of the written NIST analysis, which can be found on the NCWM website. This item is related to GEN 19.1 and OTH 22.1.

Item Development:

NCWM 2022 Interim Meeting: The committee recommended that this item be given a developing status to allow the submitter to work on it. Since the 2022 interim meeting, the submitter has made additional changes to the items under consideration which are currently reflected in Block 7 above. These changes reference using the specific formula in the general code tolerance section, rather than a formula specified here.

Regional Associations' Comments:

WWMA 2021 Annual Meeting: Bob Murnane (Seraphin): submitter: this needs to go with the GEN-19. Marc Buttler (Emerson Micro Motion): wants to re-state : earlier comment on GEN item would also apply to calculation on this. He will adjust the calculation to increasing tolerance from decreasing. Bob Murnane (Seraphin): they have looked at original comments in GEN 19: they will have info for us shortly. A letter was submitted to the Committee by Marc Buttler (Emerson Micro Motion) and will be posted to the WWMA website.

The WWMA S&T Committee recommends that this Block be assigned a developmental status. The Committee recommends that item GEN-19.1 be inserted into Block 7.

SWMA 2021 Annual Meeting: Mr. Oppermann, Seraphin, stated that this item is related to Gen 19.1, and should not move forward unless Gen 19.1 moves forward as well.

This committee recommends this item be assigned Developing status.

CWMA 2021 Interim Meeting: Dr. Henry Opperman- Weights and Measures Consultants stated that if GEN 19.1 were to pass then CLM 22.1 and CDL 22.1 would need to be voted on as well. Tina Butcher-NIST Thinks original formula is correct, where as modified formula would not put a limit. Believes it needs more work. Robert Murnane-Seraphin recommended that the item stay as developing and be combined with GEN 19.1.

CWMA S&T Committee recommends that the item be developing.

NEWMA 2021 Interim Meeting: Henry Opperman (Seraphin) commented with clarification from Bob Murnane (Seraphin) that this item is in conjunction with Gen 19 and with the changes outlined in Gen 19 (see comments) He recommends this item to be forwarded as a developing item.

The NEWMA Specifications and Tolerances Committee recommends that this item be given a Developing Status.

NEWMA Report: B7: CLM-22.1
<p>Regional recommendation to NCWM on item status:</p> <p> <input type="checkbox"/> Recommend as a Voting Item on the NCWM agenda <input type="checkbox"/> Recommend as an Information Item on the NCWM agenda <input type="checkbox"/> Recommend as an Assigned Item on the NCWM agenda <i>(To be developed by an NCWM Task Group or Subcommittee)</i> <input checked="" type="checkbox"/> Recommend as a Developing Item on the NCWM agenda <i>(To be developed by source of the proposal)</i> <input type="checkbox"/> Recommend Withdrawal of the Item from the NCWM agenda <i>(In the case of new proposals, do not forward this item to NCWM)</i> <input type="checkbox"/> No recommendation from the region to NCWM <i>(If this is a new proposal, it will not be forwarded to the national committee by this region)</i> </p>
<p>Comments and justification for the regional recommendation to NCWM: <i>(This will appear in NCWM reports)</i></p> <p>No comments were heard from the body on this item, however, the committee recognizes the need to further develop this block.</p>

Additional letters, presentation and data may have been submitted for consideration with this item. Please refer to <https://www.ncwm.com/publication-16> to review these documents.

BLOCK 8 ITEMS (B8) TOLERANCES ON TESTS USING TRANSFER 8STANDARDS, APPENDIX A - TOLERANCES FOR STADARDS, AND APPENDIX D – FIELD STANARDS AND TRANSFER STANDARDS

Note: These proposals are a combined modification of the 2021 S&T Agenda Block 1 Items GEN-19.1 and OTH-22.1. Since the S&T Committee has changed item GEN-19.1 from “assigned” to “developing,” the submitter has worked with NIST OWM to revise and combine the original proposals of GEN-19.1 and OTH-22.1 to address discussions within the NCWM Field Standards Task Group and other comments received at the regional weights and measures meetings on the proposals. These items are related, so they are presented together. These OWM and Seraphin proposals were submitted to the S&T Committee just before the 2022 Interim Meeting.

Note: The OWM and Seraphin proposals submitted to the S&T Committee just before the 2022 Interim Meeting were updated with two changes at the request of the Submitters following the 2022 Interim Meeting. The first change is in the definition of “Standard, Field.” The words “(typically one year)” were

replaced with “(as determined by the Director)”. The second change was to add the words “to the International System of Units (SI)” in the section 3.1.3. of the Fundamental Considerations. These two changes are reflected in the items below.

Source:

Seraphin Test Measure Company (GEN-19.1) and NIST, Office of Weights and Measures (OTH-22.1)

Purpose:

- (a) Add a tolerance statement to the General Code that applies whenever a Type 2 transfer standard is used;
- (b) Clarify in the Fundamental Considerations (Appendix A of Handbook 44) that the authority to approve field test standards rests with the regulatory official and that specific types of field test standards need not be identified in the body of a Handbook 44 Code in order to be approved by the weights and measures director;
- (c) Add text to Section 3.2. Tolerances for Standards of the Fundamental Considerations (Appendix A of Handbook 44) to recognize the wide range of transfer standards already recognized in Handbook 44, explain the critical differences between field standards and transfer standards, and to specify the formula to be used to calculate the device tolerance when the uncertainty of the transfer standard exceeds the one-third requirement; and
- (d) Add definitions to Appendix D of Handbook 44 for field standard and Type 1 and Type 2 transfer standards that identify the critical characteristics for field 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., ~~transfer standard.~~ and ~~standard, transfer.~~

Item Under Consideration:

Amend Handbook 44, General Code as follows:

G-T.5. Tolerances on Tests When Type 2 Transfer Standards Are Used. – When Type 2 transfer standards are used, the following formula shall be used to compute the tolerance applicable to the device under test:

$$\text{Increased MPE} = (2/3 \times \text{MPE} + U)$$

with an upper limit of $U_{\text{MAX}} = 2/3 \text{ MPE}$

Where MPE is the basic tolerance that applies when using a basic reference standard; and

U = uncertainty associated with the Type 2 transfer standard.

The increase in the applied tolerance when using a Type 2 transfer standard applies only to the basic tolerances for devices as defined in Handbook 44; that is acceptance, maintenance and minimum tolerances. Note that the repeatability tolerance and the special test tolerances are NOT increased.

Codes 5.56.(a) Grain Moisture Meters, 5.56.(b) Grain Moisture Meters, and 5.57. Near-Infrared Grain Analyzers are exempt from this requirement because NIST Handbook 159 has requirements for monitoring and retesting grain samples to ensure adequate stability and the tolerances for the devices under test already incorporate the uncertainty associated with the use of grain samples as transfer standards. The code 2.21. Belt-Conveyor Scale Systems Code is also exempt because relative and absolute tolerances are included in the code.

Amend Handbook 44 Appendix D – Definitions as follows.

Standard, Field. – A physical artifact, static or dynamic measurement device or a reference material that (a) meets the requirements of the Fundamental Considerations, Section 3.2., (b) is stable (accurate and repeatable) over an extended period of time (as determined by the Director), (c) is valid (corrections that may be used) over the range of environmental and operational parameters in which the commercial measuring devices are used, and (d) is traceable to the reference or working standards through comparisons, using acceptable laboratory procedures. [3.34, 3.38, 3.39, x.xx, x.xx...]
(Added 202X)

~~**transfer standard. – A measurement system designed for use in proving and testing cryogenic liquid-measuring devices. [3.38]**~~

Standard, Transfer, Type 1 and Type 2. – A physical artifact, static or dynamic measurement device or a reference material that is proven to be stable (accurate and repeatable) for a short time under the limited environmental and operational conditions during which the transfer standard is used. A Type 1 transfer standard is a transfer standard that meets the one-third accuracy requirement for a short time over a limited range of environmental conditions and/or a limited range of operating conditions in which it is used. A Type 2 transfer standard is one that does not meet the one-third requirement and may not be stable or valid over an extended time period or over wide ranges of environmental or operating conditions. (3.34, 3.38, 3.39, x.xx, x.xx...]
(Added 202X)

NEWMA Report: B8: GEN-19.1	
Regional recommendation to NCWM on item status:	
<input type="checkbox"/> Recommend as a Voting Item on the NCWM agenda <input type="checkbox"/> Recommend as an Information Item on the NCWM agenda <input type="checkbox"/> Recommend as an Assigned Item on the NCWM agenda <i>(To be developed by an NCWM Task Group or Subcommittee)</i> <input checked="" type="checkbox"/> Recommend as a Developing Item on the NCWM agenda <i>(To be developed by source of the proposal)</i> <input type="checkbox"/> Recommend Withdrawal of the Item from the NCWM agenda <i>(In the case of new proposals, do not forward this item to NCWM)</i> <input type="checkbox"/> No recommendation from the region to NCWM <i>(If this is a new proposal, it will not be forwarded to the national committee by this region)</i>	
Comments and justification for the regional recommendation to NCWM: <i>(This will appear in NCWM reports)</i>	
<p>Mr. Bob Murnane (Seraphin) commented that the purpose of this proposal was to define Type 1 and Type 2 Transfer Standards. Originally the proposal had the OIML formula, but the formula only calculates the meter-to-meter tolerance and as the uncertainty associated with the transfer standard increases, the tolerance allocated to the commercial device gradually decreases. The submitter is now proposing a “2/3 Formula” where the calculation includes all the uncertainty associated with the transfer standard and the tolerance allocated to the commercial meter never drops below 2/3 of the normal tolerance. Mr. Murnane requested that this proposal be given a voting status.</p> <p>After hearing comments from the floor, the committee recognized the need to further develop this block and recommended the block retain developing status.</p>	

B8: OTH-22.1 D Appendix A: Fundamental Considerations, 3. Testing Apparatus

Item Under Consideration:

Amend Handbook 44, Appendix A: Fundamental Considerations as shown below. Delete Footnote 2 referenced in Section 3. Testing Apparatus of NIST Handbook 44 Appendix A, Fundamental Considerations, moving portions of

the footnote into Section 3.1 as part of the proposed changes to Section 3.1 shown above. Note that no changes are proposed to Footnote 1.

~~²Recommendations regarding the specifications and tolerances for suitable field standards may be obtained from the Office of Weights and Measures of the National Institute of Standards and Technology. Standards will meet the specifications of the National Institute of Standards and Technology Handbook 105-Series standards (or other suitable and designated standards). This section shall not preclude the use of additional field standards and/or equipment, as approved by the Director, for uniform evaluation of device performance.~~

3.1. Adequacy.² – Tests can be made properly only if, among other things, adequate testing apparatus is available. Testing apparatus may be considered adequate only when it is properly designed for its intended use, when it is so constructed that it will retain its characteristics for a reasonable period under conditions of normal use, when it is available in denominations appropriate for a proper determination of the value or performance of the commercial equipment under test, and when it is accurately calibrated.

3.1.1. Essential Elements of Traceability. To ensure that field test standards and test methods provide for measurements that are traceable to the International System of Units (SI), through NIST or other National Metrology Institutes, they must satisfy the “Essential Elements of Traceability.” As explained in NIST IR6969 GMP-13 Good Measurement Practice for Ensuring Metrological Traceability, these elements include the following.

- Realization of SI Units
- Unbroken Chain of Comparisons
- Documented Calibration Program
- Documented Measurement Uncertainty
- Documented Measurement Procedure
- Accredited Technical Competence
- Measurement Assurance

3.1.2. Specifications for Standards. Standards will meet the specifications of the National Institute of Standards and Technology Handbook 105-Series standards or other appropriate designated documentary standards (e.g., ASTM, ASME, etc.). Recommendations regarding the specifications and tolerances for suitable field standards may be obtained from the Office of Weights and Measures of the National Institute of Standards and Technology.

3.1.3. Authority for Approving Field Test Standards and/or Equipment. This section shall not preclude the use of additional field standards and/or equipment, as approved by the Director, for uniform evaluation of device performance. Specific types of field test standards are not required to be identified in a NIST Handbook 44 code in order to be considered suitable. Provided the standards meet the “Essential Elements of Traceability” (described in Section 3.1.1. above) that help ensure the standards are suitable and capable of supporting measurements traceable to the International System of Units (SI) through NIST or other National Metrology Institutes, they need only be approved by the Director.

3.2. Tolerances for Standards. – Except for work of relatively high precision, it is recommended that the accuracy of field standards used in testing commercial weighing and measuring equipment be established and maintained so that the use of corrections is not necessary. When the field standard is used without correction, its combined error and uncertainty must be less than one-third of the applicable device tolerance.

Device testing is complicated to some degree when corrections to standards are applied. When using a correction for a standard, the uncertainty associated with the corrected value must be less than one-third of the applicable device tolerance. The reason for this requirement is to give the device being tested as nearly as practicable the full benefit of its own tolerance.

Whenever possible and practical, field standards should be used to test commercial devices. However, where it is impractical or unduly cumbersome to use field standards, transfer standards may be used.

There are two categories of transfer standards. The critical criteria that distinguish between these standards are: (1) the accuracy and uncertainty of the standard; (2) the stability as a standard over an extended period; and (3) proven validity or performance of the standard over the range of environmental and operational conditions in which the standard may be used.

A “field standard” is one that meets the one-third requirement mentioned earlier in this section. Additionally, the field standard maintains its validity or stability as a standard over an extended period (defined based on data of the standard’s stability by an authorized metrology lab or as specified by the Director) and is known to maintain its value as a standard over the full range of environmental conditions and the range of operating conditions in which the standard may be used to test commercial weighing and measuring devices. Corrections, as documented by an authorized metrology laboratory, may be used.

Transfer standards do not meet one or more of these critical criteria. One category of transfer standards, which is referred to here as a “Type 1 transfer standard,” is a transfer standard that meets the one-third accuracy requirement for a short time, under a limited range of environmental conditions and/or a limited range of operating conditions. The accuracy of a Type 1 transfer standard may have to be verified through testing each time it is used to verify that the desired accuracy and performance can be achieved when the Type 1 transfer standard is used under the limited environmental and operating conditions. When a Type 1 transfer standard is used, the basic tolerances specified for the commercial measuring devices are applied as specified in the applicable codes.

The second category of transfer standard, which is referred to here as a “Type 2 transfer standard,” is one that does not meet the one-third requirement. The Type 2 transfer standard must be stable and valid under the environmental or operating conditions in which it is used. The performance characteristics must be confirmed with sufficient data to properly characterize the uncertainty associated with the Type 2 transfer standard. When a Type 2 transfer standard is used, the tolerances applicable to the commercial weighing and measuring device must be increased to recognize the large uncertainty or corrections associated with the Type 2 transfer standard. When commercial meters are tested using a Type 2 transfer standard, the tolerance applied to the meter under test shall be determined as specified in the General Code.

(Added 202X)

3.3. Accuracy of Field Standards. – Prior to the official use of testing apparatus, its accuracy should invariably be verified. Field standards should be calibrated as often as circumstances require. By their nature, metal volumetric field standards are more susceptible to damage in handling than are standards of some other types. A field standard should be calibrated whenever damage is known or suspected to have occurred or significant repairs have been made. In addition, field standards, particularly volumetric standards, should be calibrated with sufficient frequency to affirm their continued accuracy, so that the official may always be in an unassailable position with respect to the accuracy of his testing apparatus. Secondary field standards, such as special fabric testing tapes, should be verified much more frequently than such basic standards as steel tapes or volumetric provers to demonstrate their constancy of value or performance.

Accurate and dependable results cannot be obtained with faulty or inadequate field standards. If either the service person or official is poorly equipped, their results cannot be expected to check consistently. Disagreements can be avoided and the servicing of commercial equipment can be expedited and improved if service persons and officials give equal attention to the adequacy and maintenance of their testing apparatus.

NEWMA Report: B8: OTH-22.1

Regional recommendation to NCWM on item status:

- ☐ Recommend as a Voting Item on the NCWM agenda
- ☐ Recommend as an Information Item on the NCWM agenda
- ☐ Recommend as an Assigned Item on the NCWM agenda
- (To be developed by an NCWM Task Group or Subcommittee)*
- ☒ Recommend as a Developing Item on the NCWM agenda

<p><i>(To be developed by source of the proposal)</i></p> <p><input type="checkbox"/> Recommend Withdrawal of the Item from the NCWM agenda <i>(In the case of new proposals, do not forward this item to NCWM)</i></p> <p><input type="checkbox"/> No recommendation from the region to NCWM <i>(If this is a new proposal, it will not be forwarded to the national committee by this region)</i></p>
<p>Comments and justification for the regional recommendation to NCWM: <i>(This will appear in NCWM reports)</i></p> <p>Mr. Russ Vires (SMA) commented the SMA supports this item as developing. He urged stakeholders to review the item and make comments available to submitter.</p> <p>After hearing comments from the floor, the committee recognized the need to further develop this block and recommended the block retain developing status.</p>

Background and Discussion:

NCWM 2022 Interim Meeting Item GEN-19.1 was assigned to the original submitter, Seraphin, for further development. As noted at the beginning of this item Seraphin has worked with NIST OWM to revise and combine the original proposals of GEN-19.1 and OTH-22.1. Consequently, NIST OWM has asked that OTH-22.1 be combined with GEN-19.1. For more information or to provide comment, please contact:

Mr. Robert Murnane
Seraphin Test Measure Company
A Division of Pemberton Fabricators, Inc.
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or

Ms. G. Diane Lee
NIST Office of Weights and Measures
diane.lee@nist.gov

The submitter of the original GEN 19.1 provided the following:

Over the last several years, there have been, and still are, proposals to recognize some types of meters as either transfer standards or as field standards. Handbook 44 already recognizes the use of many different types of master meters, other reference materials, or devices as transfer standards. This proposal is based upon the existing recognition and permitted use of transfer standards that are already in Handbook 44.

However, there is no common understanding among industry and weights and measures officials as to what distinguishes a field standard from a transfer standard. Consequently, changes are proposed to the Fundamental Considerations Section 3.2. and definitions are proposed for field standards and transfer standards to highlight the critical differences between these two types of standards. Any artifact, reference material or measuring device that meets the requirements of accuracy and repeatability as specified in Section 3.2. of the Handbook 44 Fundamental Considerations qualifies as a field standard. However, what has not been clearly understood is that **the field standard must meet Section 3.2. over the environmental and operational parameters in which the commercial measuring devices under test are used.** The ranges for these environmental and operational parameters may be very large and include:

- The range of flow rates at which the commercial meters under test operate (from the minimum to maximum flow rates for the meters);
- The range of air temperatures over which meters are used (perhaps 10° F to 105° F);
- The range of product temperatures over which meters are used (perhaps 10° F to 105° F, especially applicable for above ground storage tanks);
- The range of temperature differences that may exist between the product, the standard and the air over which meters are used (perhaps up to 50° F, especially for cold fuel in underground tanks and hot air temperatures);
- The range of pressures at which the pumping systems operate at different times and locations;
- The different products measured by similar meters; and

- Tests of multiple “standards” of the same type when used in different test system configurations (and “standards” of different sizes) to verify that the results agree and are consistent.

A range of environmental and operational parameters over which a transfer standard must meet the accuracy and repeatability requirements are more limited, that is, a transfer standard need only be accurate and repeatable over the conditions that exist for the “short” time that the transfer standard is used. Transfer standards may be tested before and after use to verify a commercial measuring device, so the range of conditions in which accuracy and repeatability may be relatively small. The transfer standard is only required to be accurate and repeatable during the time it is in use, which might be to test only one commercial device. For example:

- The range of flow rates at which the meters under test operate **at the time of the test**;
- The range of air temperatures that exist **at the time of the test**;
- The range of product temperatures that exist **at the time of the test**;
- The range of temperature differences that may exist between the product, the standard and the air **at the time of the test**;
- The range of pressures at which the pumping systems operate **at the time of the test**; and
- The product being measured by the meter **at the time of the test**.

A critical issue that has not been adequately addressed and defined is, “How long must a field standard remain valid (i.e., accurate and repeatable)?” Common sense dictates that the field standard must remain valid over an extended period of time. Transfer standards need only remain valid during their “short” period of use. Because (1) there are some many different types of field standards used to test commercial measuring devices, (2) there are so many transfer standards recognized in Handbook 44, and (3) the applications vary greatly, it isn’t clear that a common minimum time period for field standards or for transfer standards can be established. Nevertheless, field standards must be valid and stable over long time periods and wide ranges of environmental and operational parameters as compared to transfer standards.

Additionally, transfer standards do not have to meet the one-third requirement for the uncertainty associated with its performance. Consequently, Handbook 44 typically specifies that the basic tolerances to be applied to the device under test be increased by two times the standard deviation of the transfer standard. This presumes that the transfer standard has been adjusted to have “zero error” or corrections are used to address any significant systematic errors in the transfer standard. This also applies when field standards are used. “The reason for this requirement is to give the device being tested as nearly as practicable the full benefit of its own tolerance.”¹

The submitter also provided the following possible opposing arguments:

- I. There are several proposals before the S&T Committee to recognize some meters as field standards and field standard reference meters. These proposals have not specified how the proposed field standards are to be tested to demonstrate compliance with the Fundamental Considerations requirements of Section. 3.2. It is possible that some companies will push for the recognition of meters as field standards without submitting data to support their claims of performance as field standards.
- II. It is very difficult, time consuming and expensive to test meters that are proposed for use as field standards, especially to test using different fuels over the range of temperatures that exist for commercial applications and for temperature differences between the fuel and the air. It is possible that some will object to having to prove meter performance over the range of environmental and operational parameters.
- III. It is possible that some companies will want to use performance data collected under laboratory conditions as being indicative of the expected performance of the meters under field conditions.

¹ Handbook 44, Fundamental Considerations, Section 3.2.

IV. Laboratory calibration procedures may not reflect the performance of the proposed field standard under field conditions.

V. Some companies may object to the cost of collecting data for transfer standards (meters) of different sizes and with different flow rate ranges to prove that the results for the different sized transfer standards (metering systems) will produce consistent test results on the same commercial meters.

VI. Establishing a reasonably good estimate of the standard deviation associated with a transfer standard (to be added to the basic tolerances for the devices under test) may require significant time, effort and cost.

VII. Some companies may want to modify the device under test to be able to test the commercial measuring device, rather than testing the device as used.

The submitter states that these items are fully developed and requested that this be a Voting Item in 2022.

Background and Discussion for Item OTH-22.1 originally submitted by NIST Office of Weights and Measures.

Source:

NIST, Office of Weights and Measures

Previous Action:

New

Original Justification:

Footnote 2 of Handbook 44, Appendix A, Fundamental Considerations, Section 3. Testing Apparatus was added to:

- (1) specify recommendations for suitable field test standards;
- (2) require that field test standards meet specifications in Handbook 105 Series or other appropriate documentary standards; and
- (3) note that guidance may be obtained from NIST OWM regarding appropriate specifications, tolerances, and other criteria for assessing the suitability of a field test standard for use in inspecting and testing commercial weighing and measuring equipment.

Footnote 2 also recognizes that the Director has the authority to approve additional field test standards and/or equipment beyond those recommended by NIST or specified in a Handbook 105 or other documentary standard. NIST OWM periodically receives inquiries regarding the use of various types of test equipment and test methods. OWM has worked with state weights and measures programs and industry to develop standards and procedures and recommendations on the use of such equipment/methods and, in some cases this has resulted in a specific recommendation or Handbook 105. However, as recognized, in Footnote 2, this does not preclude the Director from approving equipment for which a specific Handbook 105 or other documentary standard does not exist.

In order to be considered suitable for use in official testing of a commercial weighing or measuring device, field test standards and procedures need to meet a list of what is often referred to as the "Essential Elements of Traceability." This list includes elements outlined in NIST IR6969 GMP-13 Good Measurement Practice for Ensuring Metrological Traceability shown above in the proposed Section 3.1.1. Essential Elements of Traceability. Provided steps are taken to ensure that a given field test standard has been demonstrated to meet the requirements in these elements, it is appropriate for that field test standard to be used in the official inspection and testing of a commercial weighing or measuring device or for use by a service company in testing and placing a device back into service after service work.

While Footnote 2 already provides a statement regarding the authority of the Director to approve such equipment, OWM believes including additional information regarding the essential elements of traceability and a reference to specific measurement practices would be helpful to both emphasize that authority and provide guidance to Directors and industry regarding the selection of appropriate field test standards.

NIST OWM recommends the guidance originally included in Footnote 2 along with the additional references to the “Essential Elements” described above are best included in the body of Section 3 for clarity and ease of use. Consequently, OWM recommends deleting the existing Footnote 2 and incorporating its contents into the body of Section 3.

OWM also believes that some may erroneously believe that field test standards must be specifically listed within a NIST Handbook 44 code in order to be used in the inspection and testing of devices covered by that code. Providing a clear statement that this is not the case along with a reference to the required criteria may help alleviate this misunderstanding.

The submitter acknowledges that Footnote 2 already provides a clear statement that the Director has authority to approve standards which are not addressed by a NIST Handbook 105 Series handbook. Some might argue that the proposed inclusion of additional information and guidance is not necessary.

The submitter states that these items are fully developed and requested that this be a Voting Item in 2022.

Additional Justification for the Formula in the Proposed G-T.5.

Assessment of the 2/3 Formula and the OIML “Reduced MPE” Formula

The 2/3 Formula: Increased MPE = $(2/3 \times \text{MPE} + U)$ with an upper limit of $U_{\text{MAX}} = 2/3 \text{ MPE}$

OIML Formula: Reduced MPE = $(4/3 \times \text{MPE} - U)$

Note: The general term “standard” is used in this paper to address both field standards and transfer standards. The specific terms “field standard” and “Type 2 transfer standard” (T2TS) distinguish between these two types of standards according to the proposed definitions submitted to the NCWM by Seraphin. Type 1 transfer standards (TITS) are not addressed in this paper.

Based on the results of a discussion between one of the submitters (Seraphin) and Marc Buttler, Emerson - Micro Motion, the submitters agreed to recommend the 2/3 formula for use rather than the OIML formula. However, it is essential that an upper limit be established on the uncertainty associated with a Type 2 transfer standard (abbreviated as T2TS). The submitters agreed to recommend this upper limit not exceed 2/3 of the MPE of the commercial device under test. The same limit should be used if the OIML formula is used.

The OIML formula and the 2/3 formula are similar, but they take different approaches to establish the tolerances for the device under test. The 2/3 formula is more logical, more technically consistent with the Handbook 44 concept of Type 2 transfer standards, and it is easier to understand. The 2/3 formula combines the tolerance that remains to be used by the commercial device with the growing uncertainty of the T2TS into one total tolerance value, whereas the OIML Reduced MPE calculates only the tolerance applied to test of the commercial meter under test. When Type 2 transfer standards are used in the field, the uncertainties associated with the T2TS should be recorded on the report form or a copy of the calibration certificate should be left with the test report, so the uncertainty values are available on site and can be used in an analysis should the tests with another T2TS generate different results.

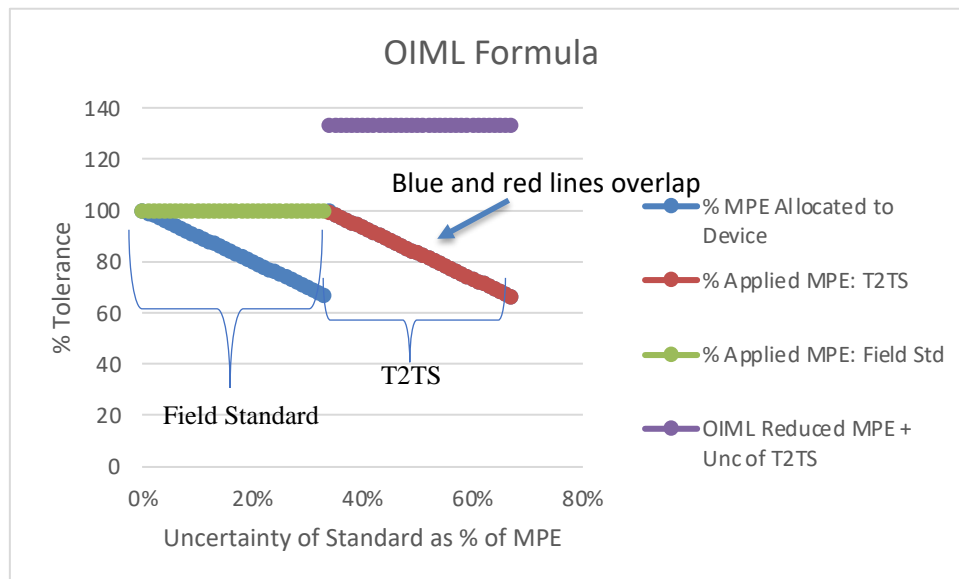
The most accurate reference standard that is available should always be used for any field test. However, when the only practical option for a field test that is available is a Type 2 transfer standard, the 2/3 formula will err in favor of the commercial device to avoid failing a device that should have passed. Conversely, the OIML Reduced MPE might result in failing a commercial device that would have passed had a more accurate (e.g., Type 1 transfer or field) reference standard been available to use for the test.

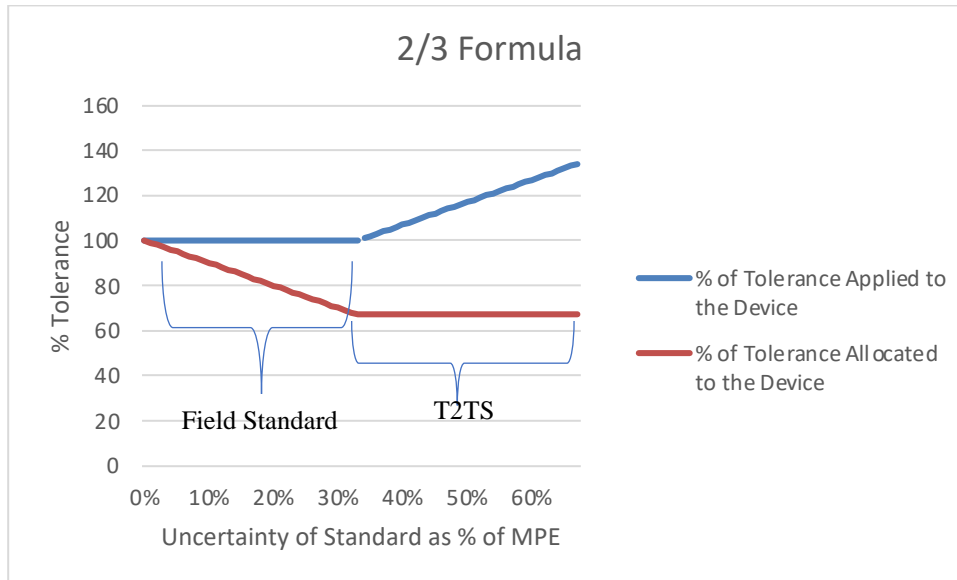
Conclusion

Field standards are intended to have an error and uncertainty less than or equal to 1/3 of the tolerance applied to the commercial device under test. When a Type 2 transfer standard has an uncertainty slightly greater than 1/3 of the tolerance, then, using the 2/3 formula, the total tolerance applied to the device under test increases above the H44

tolerance by the amount that the uncertainty associated with the Type 2 transfer standard exceeds the 1/3 limit, thereby establishing a total tolerance slightly greater than the H44 tolerances specified in the applicable codes and keeping the portion of the tolerance that remains allocated to the device under test at a constant level equal to 2/3 of the H44 tolerance. When the uncertainty for the Type 2 transfer standard exceeds 1/3 of the MPE, the OIML formula resets the “Reduced MPE” (applied tolerance) to 100% of the MPE. As the uncertainty of the Type 2 transfer standard gets larger and larger, the tolerance allocated to the device under test (e.g., a meter since OIML R117 applies to meters) gets smaller and smaller, to the extent that it is not realistic to use a T2TS to test a commercial meter, because the uncertainty of the T2TS uses up most of the device tolerance. The 2/3 formula is consistent with (but actually smaller than) the usual H44 tolerances that state that the basic tolerances are to be increased by two standard deviations when using a T2TS. Note that with a U_{MAX} of 2/3 MPE for the maximum uncertainty of the T2TS, the applied tolerance associated with the field test result using the 2/3 formula never exceeds 1.33 of the original H44 tolerance for the device under test. The submitters note that, while these principles and associated formula were established to apply to metering systems, the concepts can apply equally to other types of commercial weighing and measuring equipment.

The 2/3 formula specifies the total uncertainty as the device tolerance when a T2TS is used. The OIML formula generates only the tolerance applied to the meter under test when a T2TS is used. The OIML formula is designed to keep the combined Reduced MPE value plus the uncertainty associated with the T2TS equal to 1.33 MPE. The OIML formula should also have an upper limit for the uncertainty of the T2TS as well, which should be U_{MAX} of 2/3 MPE. Note that when there is an upper limit of 2/3 the MPE, then the OIML formula always has a tolerance (applied MPE or the Reduced MPE) that is greater than or equal to 2/3 of the original MPE. The OIML Reduced MPE is the tolerance applied to the reading of the meter under test compared to the reading of the T2TS. Consequently, the use of the Reduced MPE with a T2TS is a meter-to-meter or device-to-device tolerance.





The error in the device under test is determined as the difference between the indication of the device under test compared with the value represented or measured by the standard (usually presumed to have zero error or corrections are used for any errors in the standard).

The increase in the applied tolerance when using a Type 2 transfer standard applies only to the basic tolerances for devices as defined in Handbook 44, i.e., acceptance, maintenance and minimum tolerances.² Note that the repeatability tolerance and the special test tolerances are NOT increased. [Note that the definition should apply to all codes, not just those listed with the definition, which do not include all codes that refer to basic tolerances.]

Explanation and Assessment

Field Standards: Uncertainty is Part of the Tolerance

Under the Fundamental Considerations, the correction and uncertainty of field standards are not to exceed 1/3 of the tolerance for the device under test. Under this condition, field standards are considered to be known values and the H44 tolerance is applied to the device under test without any consideration for the uncertainty associated with the field standard. The uncertainty associated with field standards may vary from nearly zero relative to the tolerance for the device under test up to 1/3 of the tolerance for the device under test. Even though the field standard may have an uncertainty as large as 1/3 of the tolerance applied to the device under test, the tolerance specified in H44 for the device is applied without consideration for the uncertainty associated with the field standard. The objective of this limit on the uncertainty associated with field standards "...is to give the device being tested as nearly as practicable the full benefit of its own tolerance."³ Once the uncertainty associated with a "standard" exceeds the 1/3 limit, the "standard" no longer qualifies as a field standard, but is a Type 2 transfer standard under Seraphin's proposed definitions.

² **basic tolerances.** – Tolerances on underregistration and on overregistration, or in excess and in deficiency, that are established by a particular code for a particular device under all normal tests, whether maintenance or acceptance. Basic tolerances include minimum tolerance values when these are specified. Special tolerances, identified as such and pertaining to special tests, are not basic tolerances. [2.20, 2.22., 3.34, 3.38, 4.42, 5.54]

³ Handbook 44, Fundamental Considerations, Section 3.2

Type 2 Transfer Standards: Uncertainty is Added to the Tolerance

When the uncertainty associated with a T2TS exceeds 1/3 of the tolerance applied to the device under test, the uncertainty of the T2TS is recognized in the field test result by increasing the tolerance that is applied to the device under test. The OIML formula and the 2/3 formula take different approaches to increasing the tolerance for the device under test.

	Field Standard	Field Standard	OIML Formula	OIML Formula	2/3 Formula	2/3 Formula
Uncertainty of Standard (as % of Tolerance)	% of MPE (Tolerance) Applied to the Device	% MPE (Tolerance) Allocated to Device	% of MPE Applied to the Difference in the Test Results Using a T2TS	OIML Reduced MPE and Uncertainty of T2TS (%)	% of Combined Tolerance and Uncertainty Applied to the Device	% of Combined Tolerance and Uncertainty Allocated to the Device
0%	100	100				
10%	100	90				
20%	100	80				
30%	100	70				
33%	100	67				
34%			99	133	101	67
40%			93	133	107	67
50%			83	133	117	67
60%			73	133	127	67
67%			67	133	133	67
70%			63	133	137	67
80%			53	133	147	67
90%			43	133	157	67
100%			33	133	167	67

The OIML formula increases the tolerance applied to the device under test by 1/3 minus the uncertainty of the T2TS as soon as the uncertainty of the Type 2 transfer standard exceeds the 1/3 limit. This increase recognizes the uncertainty that is up to 1/3 of the tolerance for field standards. Hence, the tolerance applied to the device under test plus the uncertainty of the T2TS is 1.33 times the original MPE when the uncertainty of the Type 2 transfer standard exceeds 1/3 of the MPE. As the uncertainty of the Type 2 transfer standard increases, the portion of the MPE allocated to the meter under test for the field test result decreases. If the uncertainty of the Type 2 transfer standard becomes very large, the poor accuracy and/or poor repeatability of Type 2 transfer standard makes its use ineffective.

In the 2/3 approach, the formula starts with 2/3 of the device tolerance (i.e., the MPE) apportioned to the device under test, which is the situation when the uncertainty of a field standard is exactly equal to 1/3 of the device tolerance. Next, the uncertainty associated with the T2TS is added to the 2/3 of the original MPE. Consequently, the tolerance (i.e., the MPE) applied to the field test gradually increases by the same amount as the uncertainty for the Type 2 transfer standard increases above the 1/3 level of the original MPE. An upper limit for the uncertainty of the T2TS is proposed to be 2/3 of the MPE, so that the uncertainty does not increase without limit and become meaningless. Hence, the tolerance applied to the device under test, when a T2TS has an uncertainty at the upper limit of 2/3 the MPE, the total tolerance plus the uncertainty will be 1.33 times the original MPE, which is equal to the maximum allowed by the OIML formula for the Reduced MPE plus the uncertainty of the T2TS when the uncertainty of the T2TS just exceeds the 1/3 limit.

The Impact of Large Uncertainties for Field and Transfer Standards

When different standards are used to test the same commercial devices, there is the possibility that the results will not agree exactly. As the uncertainties associated with the field or Type 2 transfer standards increase, then the probability increases that the field test results will not agree or even agree within tolerance. The concern is that some commercial devices could be tested with one standard and pass (or fail) the field tests, but, when tested with a different standard, some commercial devices would fail (or pass) the field tests. Consequently, it is important to keep the uncertainties associated with the standards used to test commercial devices as small as reasonably possible, so that the probabilities of getting different field test results when using different standards are reduced.

Regional Associations' Comments on GEN-19.1:

WWMA 2021 Annual Meeting: Marc Buttler (Emerson Micro Motion): Regards to the fine work of the workgroup and authors of form 15, he finds it useful and helpful by augmenting the existing wording to add clarity as we work forward to more practical testing. He wanted to comment on whether the underlying principle of affording additional tolerance not capable of meeting the 1/3rd. In the language there is an equation (lower down in the proposal) reduced MPE. This is intended to penalize the tolerance of the device and not give additional leeway. Further into the justification it references an established principle that says that additional tolerance is afforded when complex. A better equation would be to take the MPE x 2/3 PLUS and not minus. This avoids jurisdictions having different uncertainty testing to different tolerances. He can prepare a written summary of his comments and will send to us. Bob Murnane (Seraphin): Seraphin proposed this. There is a lack of definitions. This comes into play in block 5. This was put in to clarify and give definite definitions to field and transfer standards. He hopes this clarifies multiple items on the agenda. Russell Vires (Scale Manufacturers Association): This item has been around for a while and was part of block 1. It has been pulled out and changed. The SMA has made comments in the past to support this item, but at this point they will meet in November and review; they have not been able to review the substantial changes yet. They have no position as of now. This needs to remain developing to allow stakeholders the opportunity to review.

Diane Lee (NIST OWM): Wants to expand on Russ's comments. This was included in a block with terminology for standards, (master meter, transfer standard or field standard). She questioned whether the transfer standards could meet the 1/3 standard. NIST has an analysis from the annual meeting that will address some of the issues; however, they have not met as a group yet. We can look online on NCWM and look forward to them providing additional info. (Previous analysis is available on the NCWM website).

The WWMA recommended that this be a Developing Item.

SWMA 2021 Annual Meeting: Mr. Henry Oppermann, representing Seraphin, explained the differences between Field Standards, Type 1 and Type 2 Transfer Standards, and expressed support for a proposed change that originated in the Western. Mr. Tim Chesser, State of Arkansas, questioned what "sufficient data" would be once a device is placed into service as a Standard, and how often it would need to be reverified. Mr. Oppermann responded to Mr. Chesser stating that the Master Meter Task Group must evaluate the performance of these devices and create calibration and performance requirements in the future. Russ Vires, Scale Manufacturers Association, stated that they have no position at this time. Russ Vires, Mettler Toledo, stated that he believes this is in conflict with Block 1, and would recommend it continue with a Developing status. Mr. Michael Keilty, Endress + Hauser, assured Mr. Chesser that any devices used as a Field Standard would have a traceable chain of metrology.

The SWMA recommended that this item remain Assigned pending the Workgroup finding a new Chairperson.

CWMA 2021 Interim Meeting: Tina Butcher-NIST about working together with Seraphin to develop more. Robert Murnane-Seraphin Test Measure agreed with Tina and looked forward to working together. Should stay as developing. Lou Straub-SMA has not had the chance to review but would be meeting in two weeks.

CWMA S&T Committee recommends item move forward as a developing item.

NEWMA 2021 Interim Meeting: Henry Opperman (W&M Consulting/Seraphin) Commented that they are updating the formula in the proposal due to the feedback received from the Western Weights and Measures Association and recommended a Developing Status. Updates can be found on the NCWM website. Lou Straub representing the SMA agreed with a Developing Status and reminded us that SMA positions have been posted on the NCWM website.

- 1 The NEWMA Specifications and Tolerances Committee recommends that this item be given a Developing Status.
- 2 Additional letters, presentation and data may have been submitted for consideration with this item. Please refer to
- 3 <https://www.ncwm.com/publication-16> to review these documents.

Mr. Jim Willis, New York | Committee Chair

Mr. Steve Timar, New York | Member

Mr. Jason Flint, New Jersey | Member

Mr. Brad Bachelder, Maine | Member

Specifications and Tolerances Committee

Appendix A

Item Block 2 – Final Report of the Verification Scale Division Task Group

Participants:

Doug Musick, Chair (KS)
Ross Andersen (NY, Retired and original submitter of the item)
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Luciano Burtini (Measurement Canada)
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The mission of the task group, as defined by the S&T Committee, is to review Handbook 44, Section 2.20. Scales and relevant portions of OIML R76, using the items included in S&T Agenda Items: Block 2 as a reference point, and recommend changes as necessary to:

1. Clarify how the error is determined in relation to the verification scale division (e) and the scale division (d)
2. Clarify which is the proper reference; the verification scale division (e) or the scale division (d) throughout this section
3. Ensure proper selection of a scale in reference to the verification scale division (e) and the scale division (d)
4. Clarify the relationship between the verification scale division (e) or the scale division (d)

This report is divided into three sections:

1. Clarify the relationship between e and d, i.e., ensure we understand the terms. (Mission items 4 and 1)
2. Propose changes to the Scales Code, if necessary, to ensure the code correctly identifies e or d as appropriate to the code paragraph. (Mission items 2 and 3)
3. Address other issues that arose as potential problems that might require additional investigation beyond the scope of this workgroup.

PART 1. Clarify the Relationship Between e and d.

We begin by looking at current HB44 definitions. The verification scale division e is used to express tolerance values and it is used in classification. The designations of e and the accuracy class are made by the manufacturer. The scale division d is a function of the actual scale function and display. Note that for weight classifiers, the weighing instrument may never display quantity at the resolution of e, and for ungraduated devices there is no scale division d to permit comparison to e.

verification scale division, value of (e). – A value, expressed in units of weight (mass) and specified by the manufacturer of a device, by which the tolerance values and the accuracy class applicable to the device are determined. The verification scale division is applied to all scales, in particular to ungraduated devices since they have no graduations. The verification scale division (e) may be different from the displayed scale division (d) for certain other devices used for weight classifying or weighing in pre-determined amounts, and certain other Class I and II scales.[2.20]

scale division, value of (d). – The value of the scale division, expressed in units of mass, is the smallest subdivision of the scale for analog indication or the difference between two consecutively indicated or printed values for digital indication or printing. (Also see “verification scale division.”) [2.20, 2.22]

scale division, number of (n). – Quotient of the capacity divided by the value of the verification scale division. [2.20]

$$n = \frac{\text{Capacity}}{e}$$

The values of e and d must be understood as referring to different things. The verification scale refers to the scale of measurement for the reference (or true value), think of the reference standard. The instrument scale refers to the scale of measurement of the instrument under test. Consider this assortment of instruments in the table below. It should be clear that the divisions of the verification scale do not always equal those on the instrument scale and may not even be in the same units. In addition, when we employ an artifact, like a test weight or slicker plate measure, the divisions of the verification scale are not visible since the artifact represents a single point on the measurement scale of the reference.

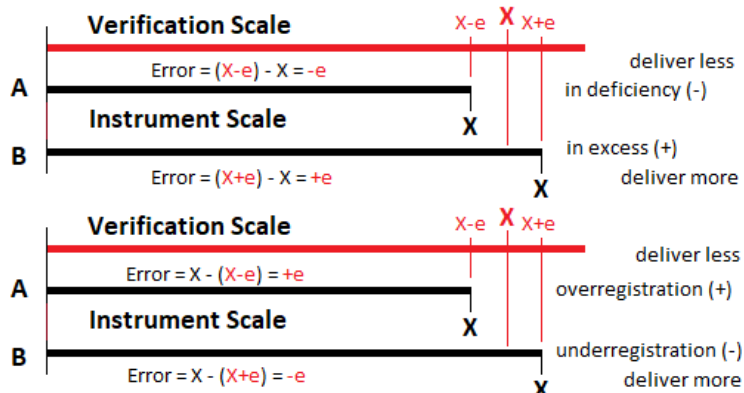
Instrument Scale	Scale div d	Verification “True Value” Scale	Scale div e	Relation e to d
Rule	1/16 in	Standard Rule or Tape	1/16 in	e = d
Taximeter	1/10 mi	Road Course	2 ft	e << d
LMD’s	0.1 gal	Prover indication	5 cu in	e > d
Mass Flow Meter	1 lb	Reference Scale	0.01 lb	e < d
Weighing Devices	0.01 lb	Test Weight (artifact)	mfr choice	e < d, e = d, e > d
Test Measure	1 cu in	Slicker Plate (artifact)	?	e ? d

For weighing instruments, it turns out that e and d have no fixed relationship. It is different for weight classifiers (e < d), for most instruments (e = d), and for high resolution instruments (e > d). The critical point is that the instrument scale and the verification scale are independent of each other. Once you have disconnected e (declared by the manufacturer) from d (displayed on the instrument), it may now become evident that much of our confusion arose because we thought of them as connected in some way.

In the graphics below both error and tolerance are always expressed in terms of the divisions (e) of the verification scale. The primary assumption is that the verification scale is constant, and it is the displayed scales of the instruments we test that move. The scales in black are depicted as in error by +1 e or –1 e.

Error of delivery =
verification scale – instrument scale
+ in excess
– in deficiency

Error of Indication =
instrument scale – verification scale
+ overregistration
– underregistration



Much of our confusion arises because scales are tested using artifacts with no visible scale divisions. We could mirror this in the test of a fuel dispenser. Normally you stop the test at 5 gallons on the instrument scale and read the error as – 3 cu in from the test measure (verification) scale. Now change that procedure and stop the test at the zero mark on the test measure. How would you determine the error? Assume the instrument now reads 5.012 gal. The error is -0.012 gal (-3 cu in), and we calculate it as verification scale – instrument scale. We determined the error from the instrument scale. The verification scale division, however, did not switch from the test measure to the instrument simply because we changed the procedure. The verification scale division remains 1 cu in and is still on the test measure, the reference.

Consider the Class III scale at right where $e = d$. Technically you can't see divisions on either scale since the artifact has no visible divisions and the instrument is digital. The correct instrument indication of 500 d is 1.2 e short of 500 e on the verification scale. You could mirror this by applying 498.8 e of test weights to get indication of 500 d. It is not in tolerance, but only if you apply error weights in your test.

Consider the Class II scale at right where $e = 10 d$. You can't see divisions on either scale because the test weight is an artifact and the instrument are digital. The correct instrument indication of 50,000 d is short of the 5,000 e on the verification scale by 7 d. Thus, we say the error is +0.7 e. Error = instrument scale – verification scale. This instrument is clearly in tolerance. No error weights are necessary to see to finer than 1 e.

The principles of classification are found in the following HB44 paragraphs. In principle, the manufacturer tells the official what accuracy is to be applied to the instrument.

T.N.1. Principles.

T.N.1.1. Design. – The tolerance for a weighing device is a performance requirement independent of the design principle used.

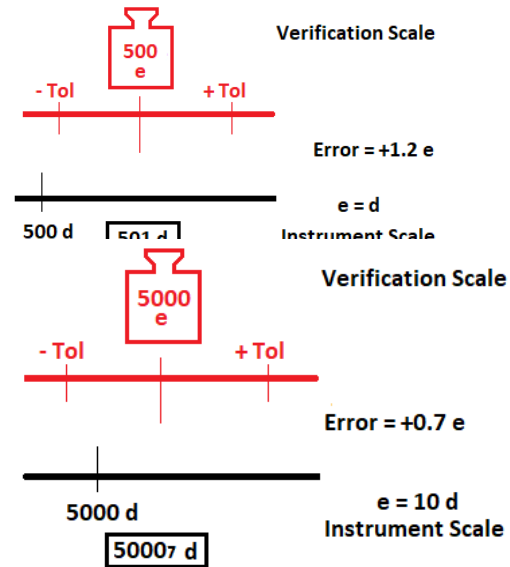
T.N.1.2. Accuracy Classes. – Weighing devices are divided into accuracy classes according to the number of scale divisions (n) and the value of the scale division (d).

T.N.1.3. Scale Division. – The tolerance for a weighing device is related to the value of the scale division (d) or the value of the verification scale division (e) and is generally expressed in terms of d or e.

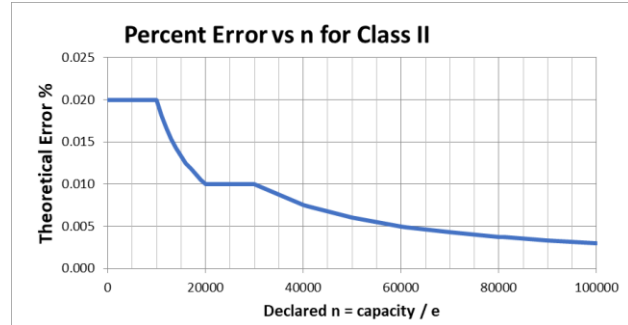
Yet, the T.N.1.2. and T.N.1.3. paragraphs conflict with the definitions. According to the definition of e, it is e “by which the tolerance values and the accuracy class applicable to the device are determined.” When the Scales Code was drafted prior to adoption in 1984, it appears some things were lost in translation from the OIML R76 on which it was based. What was lost can be expressed as those things not included in HB44 and those things incorrectly translated in HB44.

For example, R76 expresses the classification information in four required markings, and one auxiliary marking. R76 requires marking of Class, Max, e, and Min, and requires marking of d if different from e. Those markings describe the maximum and minimum loads and the relative accuracy. In contrast, HB44 requires marking of Class, capacity, and d, and requires marking of e if different from d. HB44 does not require marking of minimum load. While R76 considers minimum load part of the class structure, HB44 does not.

It is this switch of e and d that causes confusion because the translation of R76 to HB44 lost some of the meaning. Much of the second part of this report covers the changes required to rectify the situation. The workgroup is attempting to ensure the Code states e when the requirement applies to e and d when it applies to d. The workgroup is also proposing to add important material from R76 that is missing.



Some additional confusion comes from the stepped tolerance structure. For example, it is common to think that the instrument gets 1 division of error over the first tolerance step (maintenance). The correct interpretation of the code requires the instrument maintain a % accuracy based on the number of divisions of load at the break points. The space under the step riser is not supposed to be used by the instrument provided you eliminate the rounding error.



Between 1 division and 10,000 divisions for Class II in R76, this is 0.02%. At 10,000 e, 0.02% is 2 e. At 1,000 e, 0.02% is 0.2 e, and at minimum load of 50 e, 0.02% is 0.01 e. The principle is: the larger the number of verification scale divisions (n) the more accurate the instrument must be, i.e. relative error. Section 2.2 of R76 makes this clear by stating that e represents absolute accuracy and n represents relative accuracy. The Scales Code has no parallel section. It is the relative accuracy that should be our focus, but that's not found in HB44.

PART 2. Proposed changes to the Scales Code (related issues are grouped for convenience)

Group 1. Changes to clarify definitions relating to e.

verification scale division, value of (e). – A value, expressed in units of weight (mass) and specified by the manufacturer of a device, by which the tolerance values and the accuracy class applicable to the device are determined. The verification scale division is applied to all scales, in particular to ungraduated devices since they have no graduations. ~~The verification scale division (e) may be different from the displayed scale division (d) for certain other devices used for weight classifying or weighing in pre-determined amounts, and certain other Class I and II scales.~~ [2.20]

(Amended 20XX)

The last sentence is explained fully in the technical requirements in the Code. The workgroup finds it unnecessary and believe it contributes to confusion.

verification scale division, number of (n). – Quotient of the capacity divided by the value of the verification scale division. [2.20]

$$n = \frac{\text{Capacity}}{e}$$

(Amended 20XX)

scale division, number of (n). – See “verification scale division, number of (n)”

The addition of the word “verification” to the definition of n is essential since without it the section refers to the scale division d. The second definition for n was added as a cross reference since the revision will move from the s section to the v section.

Group 2. Changes to ensure proper classification of instruments.

T.N.1.2. Accuracy Classes. – Weighing devices are divided into accuracy classes according to the number of verification scale divisions (n) and the value of the verification scale division ~~(d)~~ (e).

(Amended 20XX)

T.N.1.3. Verification Scale Division. – The tolerance for a weighing device is ~~related to the value of the scale division (d) or the value of the~~ in the order of magnitude of the verification scale division (e) and is generally expressed in terms of ~~d or e~~.

(Amended 20XX)

These changes bring the principles in the T.N. section in agreement with the definitions. Classification is exclusively based on e.

Table 3. Parameters for Accuracy Classes			
Class	Value of the Verification Scale Division (d or e ¹)	Number of <u>Verification</u> Scale ⁴ Divisions (n)	
		Minimum	Maximum
SI Units			
I	equal to or greater than 1 mg	50 000	--
II	1 to 50 mg, inclusive	100	100 000
III ^{2,5}	equal to or greater than 100 mg	5 000	100 000
	0.1 to 2 g, inclusive	100	10 000
	equal to or greater than 5 g	500	10 000
III L ³	equal to or greater than 2 kg	2 000	10 000
III	equal to or greater than 5 g	100	1 200

¹ For Class I and II devices equipped with auxiliary reading means (i.e., a rider, a vernier, or a least significant decimal differentiated by size, shape, or color), the value of the verification scale division “e” is the value of the scale division immediately preceding the auxiliary means. The verification scale division e does not always equal the displayed scale division d. To ensure the correct value for e is used, refer to required markings on the device (see also notes 3 and 4 in Table S.6.3.b.).

² A Class III scale marked “For prescription weighing only” may have a verification scale division (e) not less than 0.01 g.

(Added 1986) (Amended 2003)

³ The value of a verification scale division for crane and hopper (other than grain hopper) scales shall be not less than 0.2 kg (0.5 lb). The minimum number of verification scale divisions, n, shall be not less than 1000.

⁴ On a multiple range or multi-interval scale, the number of verification divisions, n, for each range independently shall not exceed the maximum specified for the accuracy class. The number of verification scale divisions, n, for each weighing range is determined by dividing the scale capacity for each range by the verification scale division, e, for each range. On a scale system with multiple load-receiving elements and multiple indications, each element considered shall not independently exceed the maximum specified for the accuracy class. If the system has a summing indicator, the n_{max} for the summed indication shall not exceed the maximum specified for the accuracy class.

(Added 1997)

⁵ The minimum number of verification scale divisions, n, for a Class III Hopper Scale used for weighing grain shall be 2000.)

[Nonretroactive as of January 1, 1986]

(Amended 1986, 1987, 1997, 1998, 1999, 2003, and 2004 and 20XX)

The middle section of the table was not included for brevity. Notes continue below:

The changes to the header of Table 3 ensure the classification is based on e consistent with the definitions and the principles in T.N.1. The scale division d is not involved in classification. This change should reduce confusion. The

changes to the notes at the bottom of the table again ensure e is correctly referenced instead of d or the “scale division.” Referencing “n” in notes 3, 4, and 5 ensure that it is referring to e since $n = \text{capacity} / e$.

Table S.6.3.a. Marking Requirements					
To Be Marked With ↓	Weighing Equipment				
	Weighing, Load- Receiving, and Indicating Element in Same Housing or Covered on the Same CC¹	Indicating Element not Permanently Attached to Weighing and Load- Receiving Element or Covered by a Separate CC	Weighing and Load- Receiving Element Not Permanently Attached to Indicating Element or Covered by a Separate CC	Load Cell with CC (11)	Other Equipment or Device (10)
Manufacturer’s ID (1)	X	X	X	X	X
Model Designation and Prefix (1)	X	X	X	X	X
Serial Number and Prefix (2)	X	X	X	X	X (16)
Certificate of Conformance Number (CC) (23)	X	X	X	X	X (23)
Accuracy Class (17)	X	X (8)	X (19)	X	
Nominal Capacity (3)(18)(20)	X	X	X		
Value of Scale Division, “d” (3 4)	X	X			
Value of <u>Verification Scale Division</u> , “e” (4 3)	X	X			
Temperature Limits (5)	X	X	X	X	

Note: The remainder of the table was not included for brevity.

The changes to column 1 in the 7th and 8th rows simply reverse the references to the notes in Table S.6.3.b. They reflect the primacy of e in classification, which is addressed in parallel changes to notes 3 and 4 in Table S.6.3.b. (see changes to Table S.6.3.b. below).

<p style="text-align: center;">Table S.6.3.b. Notes for Table S.6.3.a. Marking Requirements</p>	
1.	<p>Manufacturer's identification and model designation and <i>model designation prefix</i>.*</p> <p>[*Nonretroactive as of January 1, 2003]</p> <p>(Also see G-S.1. Identification.) [<i>Prefix lettering may be initial capitals, all capitals or all lower case</i>]</p> <p>(Amended 2000)</p>
2.	<p><i>Serial number</i> [Nonretroactive as of January 1, 1968] and <i>prefix</i> [Nonretroactive as of January 1, 1986]. (Also see G-S.1. Identification.)</p>
3.	<p>The device shall be marked with the nominal capacity. <i>The nominal capacity shall be shown together with the value of the <u>verification</u> scale division, “e” (e.g., 15 × 0.005 kg, 30 × 0.01 lb, or capacity = 15 kg, d e = 0.005 kg) in a clear and conspicuous manner and be readily apparent when viewing the reading face of the scale indicator unless already apparent by the design of the device. Each <u>verification</u> scale division value or weight unit with its associated <u>nominal capacity</u> shall be marked on multiple range or multi-interval scales. <u>In the absence of a separate marking of the scale division “d” (see Note 4), the value of the scale division “d” shall be equal to the value of the verification scale division “e.”</u></i></p> <p>[Nonretroactive as of January 1, 1983]</p> <p>(Amended 2005 <u>and 20XX</u>)</p>
4.	<p><i>Required only if different from “d” “e.” This does not apply to an ungraduated device (equal arm scale) where the <u>graduations do not refer to a fixed weight value.</u></i></p> <p>[Nonretroactive as of January 1, 1986]</p> <p><u>(Amended 20XX)</u></p>

The original Scales Code adopted 1984 made d the primary mandatory marking but this resulted in confusion. The changes make e the mandatory marking and now requires d only if different from e.

The changes regarding multiple range and multi-interval scales makes the note say what we have always been applying. The intent was for each range or subrange of the instrument to have marking of capacity and e. The “or weight unit” could refer to lb or kg, but that is clearly not the intent.

There is some concern if this might pose problems for existing equipment. If the marking is of the form “capacity 30 lb x 0.01 lb” the workgroup sees not conflict. However, markings in the form “capacity = 30 lb d = 0.01 lb” would cause a conflict as devices using that form would no longer conform with the proposed changes. The workgroup decided to refer this to the scale manufacturers to see if there are any devices in the marketplace that would be affected. We also learned that this might cause a conflict with Measurement Canada as they do see devices with markings of capacity= d=. Note this is not an issue when e ≠ d as both markings is already required by the combination of notes 3 and 4. If necessary, a note with qualification “devices manufactured before January 1, 20XX” could be added to accept existing scales marked with d = provided d = e.

S.1.2.2. Verification Scale ~~Interval~~ Division

The magnitude of the verification scale division e relative to the scale division d for different types of devices is given in Table S.1.2.2. Relative Magnitude of e to d.

Table S.1.2.2. Relative Magnitude of e to d	
<u>Type of device (see Note)</u>	<u>Relative magnitude of e to d</u>
<u>Graduated, without an auxiliary indicating device</u>	<u>$e = d$</u>
<u>Graduated, with an auxiliary indicating device</u>	<u>$e > d$ and e is chosen by the manufacturer according to Table 3. and S.1.2.2.1.</u>
<u>Graduated, and marked for use in special applications (weight classifier)</u>	<u>$e < d$ and e is chosen by the manufacturer according to Table 3. and S.1.2.2.4.</u>

Note: Ungraduated devices, e.g. equal arm balances where the scale graduations do not represent a fixed weight quantity, are not included in this table since they have no scale divisions (d) to permit comparison with (e).

S.1.2.2.1. Class I and II Scales and Dynamic Monorail Scales. – If $e \neq d$, the verification scale ~~interval~~ division “e” shall be determined by the expression:

$$d < e \leq 10 d$$

If the displayed scale division (d) is less than the verification scale division (e), then the verification scale division shall be less than or equal to 10 times the displayed scale division.

The value of e must satisfy the relationship, $e = 10^k$ of the unit of measure, where k is a positive or negative whole number or zero. This requirement does not apply to a Class I device with $d < 1$ mg where $e = 1$ mg. If $e \neq d$, the value of “d” shall be a decimal submultiple of “e,” and the ratio shall not be more than 10:1. If $e \neq d$, and both “e” and “d” are continuously displayed during normal operation, then “d” shall be differentiated from “e” by size, shape, color, etc. throughout the range of weights displayed as “d.”

(Added 1999) (Amended 20XX)

S.1.2.2.2. Class I and II Scales Used in Direct Sales. – *When accuracy Class I and II scales are used in direct sale applications the value of the displayed division “d” shall be equal to the value of the verification scale interval “e.”*

[Nonretroactive as of January 1, 2020; to become retroactive as of January 1, 2023]

(Added 2017)

S.1.2.2.3. Deactivation of a “d” Resolution. – It shall not be possible to deactivate the “d” resolution on a Class I or II scale equipped with a value of “d” that differs from “e” if such action affects the scale’s ability to round digital values to the nearest minimum unit that can be indicated or recorded as required by paragraph G-S.5.2.2. Digital Indication and Representation.

(Added 2018)

S.1.2.2.4. Class III and IIII Scales. The value of “e” is specified by the manufacturer as marked on the device. Except for dynamic monorail scales, “e” must be less than or equal to “d.”

(Added 1999)

S.5.3. S.1.2.2.5. Multi-Interval and Multiple Range Scales, Division Value. – On a multi-interval scale ~~and~~ or a multiple range scale, the value of “e” shall be equal to the value of “d.”
(Added 1986) (Amended 1995 and 20XX)

S.1.2.2.6. Class IIIL Scales. On Class IIIL scales the value of “e” shall equal the value of “d.”
(Added 20XX)

(Add new definition)

auxiliary indicating device. – a means to increase the display resolution of a weighing device, such as a rider or vernier on an analog device, or a differentiated least significant digit to the right of the decimal point on a digital device. [2.20]

(Added 20XX)

Section S.1.2.2. is a key part of understanding application of e and d. The first change was to make references uniform to verification scale “division” as used in all other parts of the code. This section currently uses the term verification scale “interval”. Several additions of the term “scale” were also added to S.1.2.2.1. for clarity. Of note, R76 exempts Class I from the e not greater than 10 d requirement when e = 1 mg or less.

A major addition is the new text and table in T.1.2.2. This would create a parallel section in HB44 to R76 section 3.1.2 and Table 2. This section describes four types of instruments:

1. Graduated without an auxiliary indicating device – most instruments e = d
2. Graduated with an auxiliary indicating device – Class I and II with high resolution e > d
3. Graduated & marked for special applications – weight classifiers (round down instruments) e < d
4. Ungraduated – equal arm balances where graduations don’t refer to fixed weight quantities. No d

These four types also impact application of minimum load in Table 8.

The current S.5.3. was moved to this section as S.1.2.2.5. to keep these paragraphs dealing with the magnitude of e and d together. A new paragraph S.1.2.2.6. was added to address Class IIIL where e should always equal d. Now all classes (I, II, III, IIIL, and IIIL) are covered in S.1.2.2. to clarify relative magnitude of e and d.

The addition of the definition rounds out the expansion of this section

S.5.4. S.5.3. Relationship of Minimum Load Cell Verification Interval Value to the Verification Scale Division. – The relationship of the value for the minimum load cell verification scale interval, v_{min} , to the verification scale division, d ~~e~~, for a specific scale using National Type Evaluation Program (NTEP) certified load cells shall comply with the following formulae where N is the number of load cells in a single independent¹ weighing/load-receiving element (such as hopper, railroad track, or vehicle scale weighing/load-receiving elements):

(a) $v_{min} \leq \frac{d^* e}{\sqrt{N}}$ for scales without lever systems; and

(b) $v_{min} \leq \frac{d^* e}{\sqrt{N} \times (\text{scale multiple})}$ for scales with lever systems.

~~[*When the value of the scale division, d, is different from the verification scale division, e, for the scale, the value of e must be used in the formulae above.]~~

This requirement does not apply to complete weighing/load-receiving elements or scales, which satisfy all the following criteria:

- the complete weighing/load-receiving element or scale has been evaluated for compliance with

T.N.8.1. Temperature under the NTEP;

- *the complete weighing/load-receiving element or scale has received an NTEP Certificate of Conformance; and*
- *the complete weighing/load-receiving element or scale is equipped with an automatic zero-tracking mechanism which cannot be made inoperative in the normal weighing mode. (A test mode which permits the disabling of the automatic zero-tracking mechanism is permissible, provided the scale cannot function normally while in this mode.*

[Nonretroactive as of January 1, 1994]

(Added 1993) (Amended 1996, ~~and~~ 2016, ~~and~~ 20XX)

The renumbering resulted from the move of S.5.3. to the S.1.2.2. section as S.1.2.2.5. The other changes correctly reference e instead of d in this section. Technically, v_{min} for load cells corresponds to verification scale division e for weighing instruments. They are accuracy ratings declared by the manufacturer. There is no significant change for the inspector in properly referring to e since for scales where $e = d$ the issue is moot and when $e \neq d$ the section already directed the use of e. With the change the inspector will always use e.

Group 3. Changes to clarify appropriate application of tolerances (Marked Scales)

Table 6. Maintenance Tolerances (All values in this table are in <u>verification</u> scale divisions “e”)				
Tolerance in Scale Divisions				
	1	2	3	5
Class	Test Load			
I	0 - 50 000	50 001 - 200 000	200 001 +	
II	0 - 5 000	5 001 - 20 000	20 001 +	
III	0 - 500	501 - 2 000	2 001 - 4 000	4 001 +
IIII	0 - 50	51 - 200	201 - 400	401 +
III L	0 - 500	501 - 1 000	(Add 1 $\frac{1}{2}$ e for each additional 500 $\frac{1}{2}$ e or fraction thereof)	

The proper reference in this section has always been e, and this is how it has always been interpreted. The current language says “scale divisions” which technically refers to d. This means we weren’t following the Code. The removal of “in Scale Divisions” after Tolerances in the second row was made to provide parallel construction with the header for Test Load. The parenthetical at the top should be sufficient to cover both sections of the table.

The change for Class III L was made since e should be used to specify tolerances and we added S.1.2.2.6. requiring that $d = e$ for this class.

T.N.3.4. Crane and Hopper (Other than Grain Hopper) Scales. – The maintenance and acceptance tolerances shall be as specified in T.N.3.1. Maintenance Tolerance Values and T.N.3.2. Acceptance Tolerance Values for Class III L, except that the tolerance for crane and construction materials hopper scales shall not be less than 1 $\frac{1}{2}$ e or 0.1 % of the scale capacity, whichever is less.

(Amended 1986 ~~and~~ 20XX)

T.N.4.3. Single Indicating Element/Multiple Indications. – In the case of an analog indicating element equipped with two or more indicating means within the same element, the difference in the weight indications for any load other than zero shall not be greater than one-half the value of the verification scale division (e) ~~(d)~~ and be within tolerance limits.

(Amended 1986)

The reference to tolerances in T.N.3.4. and T.N.4.3. should follow the principle of expressing tolerances in e.

Group 4. Changes to clarify appropriate application of tolerances (Unmarked Scales)

T.1. General. – The tolerances applicable to devices not marked with an accuracy class shall have the tolerances applied as specified in Table T.1.1. Tolerances for Unmarked Scales.

Note: When Table T.1.1. refers to T.N. sections it shall be accepted that the scale division d on the unmarked scale always equals the verification scale division e.

(Amended 20XX)

Prior to 1984, tolerances were based on percentage of load for most scales. There was no concept of verification scale division e. In the T.N. section all tolerances are expressed in e. The note is added to clarify that d for the T. section is always equal to e from the T.N. section.

The workgroup noted that several specific paragraphs in the T. section for unmarked scales refer to tolerances in terms of d. Those sections are shown below. With the addition of the note to T.1. General, it was decided that it was not appropriate or necessary to change the d to e in these paragraphs.

T.2.2. General. – Except for scales specified in paragraphs T.2.3. Prescription Scales through T.2.8. Railway Track Scales: 2 d, 0.2 % of the scale capacity, or 40 lb, whichever is least.

T.2.4.2. With More Than One-Half Ounce Capacity. – 1 d or 0.05 % of the scale capacity, whichever is less.

T.2.7. Vehicle, Axle-Load, Livestock, and Animal Scales.

T.2.7.1. Equipped With Balance Indicators. – 1 d.

T.2.7.2. Not Equipped With Balance Indicators. – 2 d or 0.2 % of the scale capacity, whichever is less.

T.2.8. Railway Track Scales. – 3 d or 100 lb, whichever is less.

Group 5. Changes to clarify appropriate scale selection (reference Table 8)

Table 8.		
Recommended Minimum Load		
Class	Value of <u>Verification Scale Division “e”</u> (d or e*)	Recommended Minimum Load <u>in</u> scale divisions “d” (See notes) (d or e*)
I	equal to or greater than 0.001 g	100
II	0.001 g to 0.05 g, inclusive	20
	equal to or greater than 0.1 g	50
III	All**	20
III L	All	50
IIIH	All	10

*For Class I and II devices equipped with auxiliary reading means (i.e., a rider, a vernier, or a least significant decimal differentiated by size, shape or color), the value of the verification scale division “e” is the value of the scale division immediately preceding the auxiliary means. For Class III and IIIH devices

~~the value of “e” is specified by the manufacturer as marked on the device; “e” must be less than or equal to “d.”~~

The displayed scale division d is not always equal to the verification scale division e. To ensure the correct values are used, refer to required markings on the device (see also notes 3 and 4 in Table S.6.3.b.).

For an ungraduated device, the scale division d shall be replaced with the verification scale division e in the last column.

******A minimum load of ~~10 d~~ 5 e is recommended for a weight classifier marked in accordance with a statement identifying its use for special applications.

In the header, the change in column 2 references e and the change in column 3 references d and directs you to the notes. Currently, the Code references (d or e) in both columns which causes confusion. We’re never sure which one to use. The justification for d in the last column follows below.

It is vital to understand that Table 8. is tied closely to Table 3. You will find that header to the first two columns in both tables, with these changes, will be identical. The workgroup also revised the * note to remove the * and use parallel text to revised note 1 of Table 3. The notes section contains two special exceptions to the general values in column 3 the table. The first directs you to use e in the last column for ungraduated instruments, as these have no d values. The second directs you to use a minimum load of 5 e for weight classifiers. This aligns the value with R76. Note that the use of d for weight classifiers leads to unusual situations. Two weight classifiers with 100 lb capacity and e of 0.05 lb should have the same minimum load. However, they might have very different d values, say 1 lb and 0.2 lb. Declaring minimum load as 10 d for these result in very large differences of 10 lb minimum load for the first instrument and 2 lb for the second. Since $e < d$ for weight classifiers, the minimum load is correctly expressed in e.

Understanding Minimum Load

In R76, minimum load “Min” is included in the principles of classification, see 2.2. below. There are 4 mandatory markings; Class, Max, Min and e. When R76 was translated into HB44 a conscious decision was made to remove Min from the classification and make it a user requirement. Thus, HB44 only has 3 mandatory markings; Class, Capacity, and d. We have already proposed to change the d to e above.

2.2 Principles of the metrological requirements

The requirements apply to all instruments irrespective of their principles of measurement.

Instruments are classified according to:

- the verification scale interval, representing absolute accuracy; and
- the number of verification scale intervals, representing relative accuracy.

The maximum permissible errors are in the order of magnitude of the verification scale interval. They apply to gross loads and when a tare device is in operation they apply to the net loads. The maximum permissible errors do not apply to calculated net values when a preset tare device is in operation.

A minimum capacity (Min) is specified to indicate that use of the instrument below this value is likely to give rise to considerable relative errors.

In R76, the issue of instrument accuracy is focused on Class, Max and e, parallel to HB44. Absolute accuracy in terms of e and relative accuracy in terms of n. When the load is very small, i.e. less than Min, it might appear that R76 is addressing the large relative errors resulting in 1 e tolerance for some small number of e in load. However, this is not the case. The distinction is that Min applies to use of the instrument and not to testing of the instrument.

In testing under R76 tolerances, rounding errors are eliminated (see 3.5.3.2.). In practice this usually means error weights are used to resolve the instrument errors to at least 0.2 e (NTEP generally uses 0.1 e). In addition, R76 expects that instrument divisions are relatively uniform throughout the series. In order to get a +1 e error at 1 e load and still meet the requirement that the zero division be +/- 0.5 division wide, would require the 1 e divisions be 0 e wide (i.e. be skipped). To visualize in analog, imagine an indicator that starts at zero and jumps immediately to the 2 graduation.

A load of 1 e would indicate 2 e. Likewise a load of 2 e would indicate 3 e and this pattern would repeat until the tolerance breakpoint, a load of 500 e would indicate 501 e. Then the second graduation after the break point would be skipped, i.e. the 502 e graduation. A load of 501 e would indicate 503 e with a +2 e error. All the loads up to 20,000 e would now show a +2 e error. Instruments obviously should not, and DO NOT, operate that way.

If we assume instrument divisions are uniform, as R76 does, then the divisions should be accurate to about the relative % of the accuracy class. For Class II in the first step this is 0.02%. Thus at 20 e load the maximum expected error (after eliminating rounding) should be in the order of 0.004 e, and not the 1 e permitted in the tolerance structure. So, what relative error can R76 be addressing when dealing with Min?

When an instrument is used in commerce, it is the rounding of the indication to $\frac{1}{2}$ scale division that results in large relative errors. Consider a cannabis sale of 1.05 g when the division size is 0.1 g. The instrument must round off to either 1.0 g or 1.1 g. Either one produces an error in the weight of 0.05 g. That's 4.8% relative error in the weight (0.05 g / 1.05 g) with an instrument that's supposed to be accurate to 0.02%. It is this rounding error "in use" that produces the large relative errors addressed in Min in R76 and the minimum load in HB44. This rounding error is a function of d, the displayed scale division, and not e. It is not a tolerance issue.

The confusion comes from the presentation of Min in terms of e in the last column of R76 Table 3. The table in R76 has an additional column for Min not found in HB44. In HB44 it has been relocated to Table 8. Looking closely at Table 8, you will find that the first two columns correspond to the first two columns in Table 3 in HB44. So why does R76 express this column in e instead of d? I suspect they did it because all other values in Table 3 are in e. For instruments where $e = d$, the issue is moot. Note however, that R76 reveals the ties to d for the Class I and II instruments with an auxiliary indicating device (differentiated least significant digit). In 3.4.3. R76 directs that d replace e in the Min column of Table 3 for instruments with an auxiliary indicating device.

On an instrument where $e = 10 d$, we can create the same scenario as before but now with a load of 1.005 g. The instrument must now round to either 1.00 g or 1.01 g. The rounding error is now 0.50% of the weight (0.005 / 1.005). That is 10 times smaller at the same 20 e load.

Returning to the four types of instruments from revised S.1.2.2. and applying revised Table 8.:

- | | |
|--|-------------------|
| 1. Graduated without an auxiliary indicating device: | minimum load in d |
| 2. Graduated with an auxiliary indicating device: | minimum load in d |
| 3. Graduated and marked for special use (weight classifier): | minimum load 5 e |
| 4. Ungraduated (equal arm scales): | minimum load in e |

Group 6. Changes to correctly reference to e or d as appropriate.

S.1.1.1. Digital Indicating Elements.

(a) A digital zero indication shall represent a balance condition that is within $\pm \frac{1}{2}$ the value of the verification scale division.

*(b) A digital indicating device shall either automatically maintain a "center-of-zero" condition to $\pm \frac{1}{4}$ verification scale division or less, or have an auxiliary or supplemental "center-of-zero" indicator that defines a zero-balance condition to $\pm \frac{1}{4}$ of a verification scale division or less. A "center-of-zero" indication may operate when zero is indicated for gross and/or net mode(s).
[Nonretroactive as of January 1, 1993]*

*(c) For electronic cash registers (ECRs) and point-of-sale systems (POS systems) the display of measurement units shall be a minimum of 9.5 mm (3/8 inch) in height.
[Nonretroactive as of January 1, 2021]*

(Added 2019)

(Amended 1992, 2008, ~~and~~ 2019, and 20XX)

The changes correctly reference e in this section as this is an issue of ensuring the zero indication is accurate to $\frac{1}{4}$ e. Hence it is a tolerance properly expressed in terms of e.

T.N.9. Radio Frequency Interference (RFI) and Other Electromagnetic Interference Susceptibility. – The difference between the weight indication due to the disturbance and the weight indication without the disturbance shall not exceed one verification scale division ~~(d)~~ (e); or the equipment shall:

- (a) blank the indication; or
- (b) provide an error message; or
- (c) the indication shall be so completely unstable that it cannot be interpreted, or transmitted into memory or to a recording element, as a correct measurement value.

The tolerance in T.N.9. Radio Frequency Interference (RFI) and Other Electromagnetic Interference Susceptibility is to be applied independently of other tolerances. For example, if indications are at allowable basic tolerance error limits when the disturbance occurs, then it is acceptable for the indication to exceed the applicable basic tolerances during the disturbance.

(Amended 1997 and 20XX)

This is a tolerance for reaction to a disturbance and is properly expressed in e.

Group 7. Identify appropriate application of code sections (in order of appearance)

When the paragraph references d it is referring to the actual scale division and the concern is how the instrument operates. When the paragraph references e it is referring to the verification scale division and the concern is in classification of the instrument or in accuracy of the displayed values.

The sections in the table below currently correctly reference e or d as appropriate. The text of each section is not included for brevity. The justification may help explain the general rules above.

Code Section	Applies to	Justification
G-S.5.2.2.(c)	d	Rounding is a function of instrument operation not accuracy
G-S.5.2.2.(d)	d	Requires “d” to be an indicated zero and all digits to the left of “d” to be zero when $d < 1$. Requires “d” to be an indicated zero and all digits to the right of “d” to be zero when $d > 5$.
S.1.2.	d	1, 2, or 5 refers to d which is rounded. When $e \neq d$ refer to section S.1.2.2. for value of e.
S.1.2.1	d	Refers to rounded values of d.
S.1.2.3.	e	This is a classification issue. It ensures accuracy of the piece counts.
S.1.7.(b)	e	This is a classification issue addressing maximum indication above capacity.
S.2.1.2.	d	They must be in terms of d since stability of zero setting applies to d.
S.2.1.3.(all)	d	These limit the window for action of AZT. They must be in terms of d since zero setting applies to d.
S.2.3.	d	Tare division must equal smallest increment displayed.
T.N.7.	d	Discrimination requires an instrument to discriminate to the displayed scale division (zone of uncertainty). This relates to the rounding of the smallest increment.
UR.3.7.	d	Minimum load is correctly expressed in d. (see Group 5 above)
UR.3.10.	e	As written, this is clearly e. (See issues for additional study)

PART 3. Issues Identified as Requiring Additional Study (outside the scope of this workgroup)

A. The workgroup was in consensus that we should expand requirements in S.2.1.2. relating to semi-automatic zero to apply to all scales and not just scales used in direct sale. In first place, suitability is a User Requirement and not a specification. Second, correct operation to set zero should be applicable to all digital instruments as it is in R76.

B. The application of tolerances to net loads has always been assumed, even before the Scales Code adoption in 1984. Comparing T.2. for unmarked scales and T.N.2.1. for marked scales reveals important differences particularly regarding net loads. As written, T.N.2.1. exempts calculated net, but it appears to apply to both semi-automatic tare and preset tare. A comparison to R76 shows that OIML limits applicability of tolerances. Their MPE's do not apply to calculated net values or when preset tare (keyboard or programmed tare) is in operation (section 2.2). It appears net loads have MPE's applied only when the net zero is set in compliance with S.1.1.1.(b) which requires accuracy of zero to ¼ division. This cannot be assured with preset tare or when net is based on two gross values. This has further ramifications to any case where all three (gross, tare and net) values are indicated/recorded for a transaction. OIML requires the gross and net weights be accurate but does not apparently require that the equation gross – tare = net be in mathematical agreement due to rounding issues. Note that in most transactions, the customer only gets one or two of the gross, tare or net values. Rounding issues do not arise for this reason. This may impact a current issue before NCWM dealing with printing tare on POS transaction receipts. Consider a POS transaction where the customer saw 1.02 lb on the weight display and sees 1.00 lb net and 0.03 lb tare. These are all accurate weights (and correct per R76) but the numbers don't add up. The customer will claim they were overcharged by 0.01 lb since $1.02 \text{ lb} - 0.03 \text{ lb} = 0.99 \text{ lb}$.

C. The resolution of errors in testing scales was identified as an issue. The original proposal included a revision requiring resolution of error to at least 0.2 e. R76 specifically declares that errors be resolved to at least 0.2 e to eliminate rounding error. HB44 has no such provision and it might appear that rounding error is included in the tolerance. Instead of tolerance steps of 1, 2, etc., it could be argued that the tolerances are 1.5, 2.5, etc. as the result of direct reading. NTEP uses the R76 approach exclusively in testing, but it has no technical basis in the Code. There are obvious issues involved in using error weights in the field. The challenge is that you either eliminate rounding in determining tolerances or you don't. We have two standards at play at present. In addition, it can be argued that Class IIIL instruments are already high resolution somewhat similar to Class I and II instrument with $e > d$. Class IIIL devices have enough resolution to read errors to 0.2 e or 0.1 e of the equivalent Class III instrument without using error weight.

D. The UR.3.10. requirement that transactions from dynamic monorail scales be based on e raises issues. It was discussed since it involves both e and d. The displayed scale divisions equal to e (i.e. 10 d) are not normally rounded. If $e = 10 d$ then the rounding point is not 5 up/4 down, as it is for d, but rather 9.5 up/0.5 down. Does this requirement mean the scale design has to produce a properly rounded value for the transaction that may be different from the display, e.g. 943.7 lb to d of 0.1 lb now must be recorded for the transaction as 944 lb? In addition, in brief discussion, it seemed there were many ways this could be interpreted. The workgroup concluded it would be beneficial to open some discussions with USDA and the manufacturers to explore some of these questions. This also addresses similar issues to the proposal to delete S.1.2.2.2. where questions of using e or d are impacting high precision scales in cannabis and jeweler's sales.

