**Email proposals in Microsoft Word format to** **info@ncwm.com** **by August 15, 2022.**

Each regional association will hold hearings on proposals in the fall. See meeting dates at www.ncwm.com/meetings. If any region deems that the item has merit, the region will forward the item to NCWM for national consideration. For more information on the Form 15 process, visit [www.ncwm.com/standards-dev](http://www.ncwm.com/standards-dev).

|  |
| --- |
| **GENERAL INFORMATION** |
| **1. Proposal to:** |
| \_\_ Laws & Regulations X\_ Specifications & Tolerances \_\_ Professional Development \_\_ Board of Directors \_\_ NTEP Committee |
| **2. Submitter’s Name:** | **3. Date:** |
| Robert Murnane | **February 23, 2022** |
| **4. Submitter’s Organization:** | **5. Address:** |
| Seraphin Test Measure CompanyA Division of Pemberton Fabricators, Inc. | P.O. Box 227, 30 Indel Avenue |
|  **6. City:** | **7. State:** | **8. Zip Code:** | **9. Country:** |
| Rancocas | NJ | 08073 | USA |
| **10. Phone Number:** | **11. Fax Number:** | **12. Email Address:** |
| (609) 267-0922 |  | rmurnane@pemfab.com |
| **PROPOSAL INFORMATION** |
| **13. Purpose:** Concise statement as to the intent or purpose of this proposal, such as problem being fixed. **(Do not include justification here.)** |
| There are several proposals on the S&T agenda with the objective to recognize meters for use as field standards or as transfer standards. This proposal offers an option to a add a paragraph to the General Code to state that other field standards and transfer standards may be approved by the State weights and measures Director for use to test commercial devices, rather than adding paragraphs to each specific code for this purpose. |
| **14. Document to be Amended:** |
|  X Handbook 44 Handbook 130 Handbook 133 \_\_ NCWM Guidance Document\_\_ NCWM Bylaws \_\_ NTEP Administrative Policy  |
| **15. Cite portion to be Amended:** Submit a separate Form 15 for each code, model law or regulation to be amended. |
| Section: General Code G-N. NotesParagraph: Add a new paragraph N.3. Test Methods at the end of this Section. |
| **16. Proposal:** Use **~~strikeout~~** to show words to be deleted and **underline** to show new words. **(Do not use track changes.)** |
| Add the following as a new paragraph:**G-N.3. Test Methods. – Permissible test methods for verifying compliance of weighing and measuring systems with the provisions of the General Code and Specific Codes include, but are not limited to, test methods and apparatus that have been approved by the State Director of weights and measures as outlined in Appendix A - Fundamental Considerations, Section 3. Testing Apparatus.** |
| **17. For Handbook 44 proposals, indicate one of the following:** |
| [x]  **Retroactive** (Enforceable with respect to all devices)[ ]  **Nonretroactive** (Enforceable on or after the effective date for devices a) manufactured within a state after the effective date, b) both new and used equipment brought into a state after the effective date, c) used in noncommercial applications which are placed into commercial use after the effective date, ad d) undergoing type evaluation including devices that have been modified to the extent that a new NTEP Certificate of Conformance is required.) |
| **18. Justification:** Include national importance, background on the issue, and reference to supporting data or documents. |
| Several device codes already contain references regarding transfer standards used to test commercial measurement devices (e.g., Cryogenic Liquid-Measuring Devices Code, Carbon Dioxide Liquid-Measuring Devices Code and Hydrogen Gas-Measuring Devices Code). Rather than revising a specific code in Handbook 44 every time a new field or transfer standard is proposed or developed, it is better to have an overall statement in the General Code that recognizes the use of other field and transfer standards that meet the requirements for use as field or transfer standards. The joint OWM/Seraphin proposal (GEN-19.1 and OTH-22.1) provides definitions and criteria to be included in Handbook 44 and in the Fundamental Considerations in Appendix A. It also prescribes the tolerances to be applied when using Type 2 transfer standards. For those who believe a specific statement in Handbook 44 is needed to recognize additional field and transfer standards, the proposed addition of G-N.3. will provide the reference they want without the need to change individual codes on a regular basis to recognize each particular field or transfer standard.  |
| **19. Possible Opposing Argument’s:** Demonstrate that you are aware and have considered possible opposition. |
| Some regulators may argue that if Handbook 44 does not specifically recognize a specific type of field or transfer standard, then the use of the field or transfer standard is not allowed. However, this approach would mean that every type of field or transfer standard must be specifically recognized in an H44 code and then the Handbook must be changed every time a new standard is proposed to be recognized. The Fundamental Considerations already recognize the authority of the Director to recognize new standards and transfer standards for use to test commercial devices. Footnote 2 to Section 3.1. includes the statement, “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.”Others may argue that this paragraph in the General Code is not needed, since (1) the definitions of field standard and transfer standard and (2) the Fundamental Considerations already provide for the recognition and use of other field standards and transfer standards. |
| **20. Requested Action if Considered for NCWM Agenda:** |
|  X Voting Item Developing Item Informational Item Other (Please Describe): |
| **21. List of Attachments:**  |
|  |