

Date: April 19, 2018

Subject: 2018 Publication 16 Item SCL-8 Sections Throughout the Code to Include Provisions for Commercial Weigh-in-Motion Vehicle Scale Systems

Dear Mr. Don Onwiler (NCWM Executive Director) and
Mr. Ivan Hankins (NCWM S&T Committee Chair)

Mettler-Toledo, LLC is a member of the WIM task group and has been an active participant in the task group meetings. We want to express our concern that the proposed Handbook 44 code changes in item SCL-8 do not adequately address the testing procedure to assure correct weighing performance when placing a commercial WIM vehicle scale system into service.

Mettler-Toledo has developed an alternative test procedure and requests that the status of item SCL-8 be downgraded to Informational to provide the task group additional time to consider this, and other alternative proposals for the testing process. We feel this will result in much better code for HB44 and more consistency in how testing for these devices is performed.

We appreciate your consideration on this matter and are happy to share more information or discuss this in more detail if you desire.

Sincerely,



Russell Vires
Manager, Compliance Services
Mettler-Toledo, LLC

