

August 15, 2023

National Conference on Weights and Measures
Specifications and Tolerances Committee
Nick Owens, Chair
1135 M Street, Suite 110
Lincoln, NE 68508

Re: Item EVF-23.6

To the Specifications and Tolerances Committee:

I write, on behalf of the submitters, to submit a revision to Item EVF-23.6. EVF 23.6 came to a vote at the 2023 Annual Meeting. It received enough votes from the House of State Representatives to pass, but just under 50% of the votes in the House of Delegates. Consequently, the item has returned to the Committee for further deliberations.

During the debates at the Annual Meeting, one particular concern was expressed in the form of a proposed amendment to the item. That amendment would have deleted the marking requirement from EVF-23.6. The proposer explained that the text of the marking might raise questions for consumers about what tolerances mean and why any device has a potential range. Our understanding is that this marking concern was an important motivation for several state representatives and delegates who voted against the item, but would otherwise have voted yes.

We have discussed the attached revisions with multiple NCWM voting members. The revisions would simplify the marking requirement. A charger subject to the 5% tolerance would simply have to be marked as Class 5. The “Class 5” concept would be defined in the marking provision. This approach is similar to how Handbook 44 handles accuracy classes for multiple other devices, like belt-conveyor systems. By using simply “Class 5” instead of the longer sentence from the original item, the revision would address the concern raised at the Annual Meeting.

We have preserved the Committee’s previous substantive changes. We have also simplified the structure to make the item easier to read. The original proposal said a charger could qualify for the 5% tolerance by being installed before 2024. The Committee changed that to “installed and placed into service.” Because any charger placed in service must have been installed beforehand, we have changed it to being simply, “placed into service” before 2024. In addition, we have simplified the structure: A DC charger that was placed in service before 2024 and that has the Class 5 marking is subject to the 5% tolerance; all others are subject to the 1% / 2% tolerances.

For your convenience, I attach a clean version of the original Form 15 (filed last year on August 15, 2022), substituting the text of the revised proposal, and a clean version of the revised justification. We would appreciate the Committee’s substituting the revised versions for the version of EVF-23.6 currently in the agenda.

Sincerely,
Keith Bradley