

Country Code <sup>1</sup>	Part	Clause/ Subclause	Paragraph/ Figure/Table	Type of comment <sup>2</sup>	Comments	Proposed change	Convener's responses
0001 IR					We have no comment at this stage.		Thanks.
0002 RU					No comments at this stage of development.		Thanks.
0003 AT	1			Techn.	Add 6.4.1 (f)	Checking the electronic seal has to be easily accessible. By pressing a button, a display should show a seal with timestamp or a counter.	Discussed at the May 2019 meeting. Not accepted. Agree that the electronic seal should be easily accessible. Do not agree that this must be achieved with a dedicated button. Unsure as to the requirement of a dedicated button. The record shall be easily accessible by a simple action.
0004 UK	1		General	ed	The font size for the clauses and the sub-clauses are consistent.	Please align the font sizes in the document.	Accepted.
0005 NL	1	1	3 <sup>rd</sup> paragraph	te	This is paragraph has the first instance of “smallest rectangular box”. There is no definition in the terminology for smallest rectangular box. Do we need it? From the text NMi makes the interpretation that one should take a rectangular box with the smallest volume. Is that the general interpretation?  From a previous evaluation we have seen that a particular object would fit in two different boxes where one has the smallest height and the other has the smallest lenth: 1: W=250,65, H=456,80, L=517,00 2: W=250,65, H=483.80, L=447,00 The second box has the smallest volume and that was used as the reference value.		Accepted with modification. Yes, the “smallest rectangular box” is determined by volume, not the size of any particular dimension. However, defining the smallest rectangular box may be prescriptive. Changed the sentence to “If the object is not in the form of a rectangular box, the volume of the smallest rectangular box, <u>by volume</u> , which fully encloses the object is determined (see 2.2.1).”
0006 UK	1	2.1.1, 2.1.2, 2.1.3, 2.1.4, etc		ed	Sub-clauses are not aligned correctly with the titles	Please align the sub-clauses with the titles	Accepted.
0007 CA	1	2.1.1.1		ed	Definition of length, on its own, is very generic. In our interpretation, a “linear measured dimension” could define width, height or length. We believe the definition of length should be built in a similar way that the definition of height is.	2.1.1.1 length (L)  linear measured dimension <b>that is oriented 90 degrees relative to the height and width dimensions.</b>	Following discussions at the meeting, the definition was amended as: linear measured dimension <u>that is oriented 90 degrees relative to the height and width</u>
0008 CA	1	2.1.1.2		ed	Definition of width, on its own, is very generic. In our interpretation, a “linear measured dimension” could define width, height or length. We believe the definition of width should be built in a similar way that the definition of height is.	2.1.1.2 width (W)  linear measured dimension that is oriented 90 degrees relative to the length <b>and height dimensions.</b>	Following discussions at the meeting, the definition was amended as: linear measured dimension <u>that is oriented 90 degrees relative to the length and height</u>
0009 CA	1	2.1.12		ed	Definition of rectangular box: in order to make sure we have a rectangular box, it is essential that <u>all</u> dihedral angles are right angles. Addition of the word “all” in the definition.	rectangular box (rectangular parallelepiped):  polyhedron having six faces that are parallel in pairs having <b>all</b> dihedral angles as right angles.	Following discussions at the meeting, the definition was amended as: polyhedron having six faces that are parallel in pairs having all dihedral angles as right angles.
0010 NL	1	2.1.4		Ed	Remove the definition for <b>processor</b> . It is only used in the definition of <b>indicator (clause (2.1.5))</b> . Indicator can be defined without the need for the term <b>processor</b> .	Remove the definition of processor Modify indicator (clause 2.1.5) to “device that displays the measured dimensions and the associated quantities”	Accepted with modification to the suggested definition. Definition changed to “device that displays the measured dimensions and <u>any</u> the associated quantities <del>calculated by the processor.</del> ”
0011 NL	1	2.1.6		Ed	Remove the definition of ancillary devices. It is only used in R 129-2 sub clause 1.4.10 and there the term peripheral device is more appropriate	Remove the definition of ancillary devices from part 1.  Change ancillary to peripheral in R 129-2 sub clause 1.4.10	Not accepted. Ancillary device definition is already provided in VIML while peripheral devices are not defined in VIM or VIML. Introducing these terms in R 129-2 would require them to defined anew and these devices are effectively covered by ancillary devices definition.
0012 DE-1	1	2.1.9		te	Not accepted. Secretariat unsure about the requirement and its proposed uses. Can we get more information as to the requirement and some examples of instances where this requirement would be beneficial?	Okay, but additional aspects for section 5.2.4	Please see Convener’s response to comment #0052 –DE-5.
0013 NL	1	2.2.5		Ed	Abbreviations start with a capital letter (Dim Vol, Dim Wt). Proposal to harmonize also with R 76 and R 51.	Use Max instead of max throughout R 129-1 and R 129-2.	Accepted.
0014 NL	1	2.2.6		Ed	Abbreviations start with a capital letter (Dim Vol, Dim Wt). Proposal to harmonize also with R 76 and R 51.	Use Min instead of min throughout R 129-1 and R 129-2.	Accepted.
0015 CA	1	2.2.7		te	Definition of dimensional weight: the factor applies to the object’s dimensional volume, not the individual dimensions. Request to remove “or measured dimensions” from the definition.	dimensional weight (Dim Wt or DW)  calculated value obtained by applying a conversion factor to the object's dimensional volume (see 2.2.4) <del>or measured dimensions</del>	Not accepted. Measured dimensions are a part of the dimensional weight calculation.
0016 NL	1	2.3.6		Ed	Definition of <b>Fault limit</b> contains reference to “the applicable recommendation”, while R 129 is the applicable recommendation. This seems to be a copy-and-paste error.	Change the definition to: “value delimiting non-significant faults”	Accepted.
0017 NL	1	2.5		Ed	A reference to D 11 is made but none of the definitions are from D 11	Remove the reference to D 11	Accepted.
0018 NL	1	2.5.1		Ed	Typo	Change “description by the receiver” to “decryption by the receiver”	Accepted.
0019 CA	1	2.5.1		ed	Cryptographic means: (it’s a typo.) change the word “description” by the word “decryption” (PS make sure definition in D-31 of this term is ok)	cryptographic means  encryption of data by the sender (storing or transmitting program) and <del>description</del> <b>decryption</b> by the receiver	Accepted. To be amended as per D31.

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						(reading program) with the purpose of hiding information from unauthorised persons.	
0020 CA	1	2.5.2		ed	Legally relevant: some software may interfere with properties regulated by legal metrology but they are not legally relevant. For this reason, we propose to change the word “interferes” with the word “affects” (PS make sure definition in D-31 of this term is ok)	legally relevant  software/hardware/data or part of the software/hardware/data of a measuring instrument which <del>interferes with</del> <b>affects</b> properties regulated by legal metrology,....	Accepted. To be amended as per D31.
0021 FR-1	1	2.5.3		tech	In the VIML there is a general definition for legally relevant (definition 4.08 of the VIML). The definition proposed R129 definition for legally relevant seems to only apply to software/hardware/data so it should be precise on the title of the definition.	Add in the title of the definition of legally relevant this : “ (for software/hardware/data)”	Not accepted. A definition referring to the software, hardware and data pretty much covers the entirety of the instrument. Is there anything that wouldn’t be covered? If so, please provide details.
0022 CA	1	4.1.3		ge	Expanded mode: we are fine in accepting an expanded mode but we will not support mandating it.	The mpe applicable to the measurement by the instrument of any of the three dimensions for initial and subsequent verification is <del>±1.0 d</del> , +/- <b>1d</b>	Not accepted. Maintained at 1.0d. It is not intended to mandate expanded mode.
0023 UK	1	4.1.6		ed	The title of this sub-clause reads like a requirement  “ <b>For multi-interval instruments with scale intervals of d1, d2...dr, the mpe are ± 1 d1, ± 1 d2... ± 1 dr for the applicable range and axis. Calculated quantities</b> ”	Please clarify the title and align correctly with the sub-clause. Separate the requirement from the title of the sub-clause.	Accepted.
0024 NO	1	4.1.6		Ge	A higher uncertainty than 1/3 MPE is unnecessary.	Please change to 1/3MPE	Accepted with modification. Requirement on the uncertainty of the error of indication is removed, as it mandated an expanded/enhanced resolution mode. The uncertainty in the dimensions of the tests objects has been maintained at 1/3 MPE.
0025 NL	1	4.1.6		Ed	The sentence starting with “For multi-intervals instruments ...” is a requirement, not a sub clause title.	Change layout to make “calculated quantities” the title of the sub clause.	Accepted.
0026 CA	1	4.1.6		ed	Maximum permissible variation between indicators: the word indication is already defined by a “quantity value..” we feel the current definition redundant.	Maximum permissible variation between indicators  There shall be no difference between <del>the indications of the same quantity</del> <b>when displayed on</b> different digital indicators.	Accepted.
0027 UK	1	4.1.7		ed	The reference to “GUM” is missing in the bibliography.	Propose to insert a bibliography for GUM, for example  (see Guide to the Expression of Uncertainty in Measurement, GUM, 7.2.3) [22]	Accepted.
0028 CA	1	4.1.7		ge	Calculated quantities: 1) what are calculated quantities? 2) MPEs normally apply to a measurement. In this case, we apply an MPE to a calculation? 3) We are not sure what this requirement is.		This is the same as calculated value (2.2.7). Document amended so that the document is internally consistent on terminologies.
0029 NL	1	4.1.7	(a)	Ed	A reference to GUM is made, but this is the instance of the word GUM	GUM shall be added to the Bibliography (with correct edition) and a reference to the bibliography shall be made in 4.1.7.	Accepted.
0030 NL	1	4.1.7	(b) & (c)	Ed	The use of the term mpe is not appropriate here as the requirement also applies to the fault limit.	For (b): replace mpe with “specification in 4.1.2 to 4.1.5” For (c): remove the word mpe.	Accepted.
0031 NL	1	4.2.1	(b)	Te	Make clear that the instrument shall comply at the specified temperature range, also when the range is larger or wider than – 10 °C to + 40 °C	Change to: air temperature variations at the temperature limits stated in the descriptive markings; if no temperature limits are stated in the descriptive markings – 10 °C to + 40 °C applies.	Accepted.
0032 NL	1	4.2.1	(c)	Te	Prevent that damp heat testing is performed at temperatures higher than 40 °C, as this is not specified in IEC 60068-2-78.	relative humidity of 85% and 40 °C or at 85 % and the high temperature limit if 40 °C is not included in the temperature limits.	Accepted.
0033 JP1	1	4.2.1 Rated operating conditions	(b)	ed	Semicolon is missing at the end of the item (b).	Add a semicolon at the end of the sentence.	Accepted.
0034 NL	1	4.3.3		ed	The reference to table A.1 is not correct as this table applies to object limitations and not disturbances.  The appropriate table seems to be R 129-2 table A.1, but this table itself is not correct.	Make reference to be R 129-2 table A.1 and correct this table.	Accepted.
0035 NL	1	4.3.4		te	Question: as the performance during light and acoustic effects are related to the mpe should they not be considered influence factor tests?	If the answer is yes, relocate the sub clause to 4.2.	Not accepted. Tests for the impact of influence factors would require that the instruments are tested within the rated operating conditions and the tests for light and acoustic is not designed as such. In the current version of R129, light and sound are listed separately from both influence factors and disturbances. If changed into an influence factor would manufacturers be able to elect for narrow ranges, as with temperature? If listed as a disturbance, new test criteria would then apply (fault limit and error handling). Changing these tests as influence factors would place unnecessary burden on the manufacturers.
0036 NO	1	5.1.4		te	For automatic instrument, it shall not be mandatory to require zero indication. Should other alternative be acceptable.	Shall be indicated by zero indication, a ready light or a similar display etc.	Accepted.

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0037 NL	1	5.1.4		te	The zero indication, ready light or similar display shall not be mandatory for automatic instruments. These instruments do not require the intervention of an operator and therefore this indication is useless. However, retain the last sentence: either this condition ....	Change “....and shall be indicated by a zero indication, a ready light or a similar display.” to “ ... and shall be indicated by a zero indication, a ready light or a similar display for semi-automatic instruments. Either this condition is met automatically for each measurement or the instrument is automatically inhibited.”	Accepted. The revised version only requires a zero/ready indication for semi-automatic devices. Automatic devices do not require a zero/ready indication, as the operator is typically not around to see it. However, the instrument must still be able to automatically maintain a zero/ready condition, regardless if it is semi-automatic or automatic. Additionally, the requirement now states that the instrument is only inhibited for making measurements when not in a zero/ready condition, not inhibited entirely.
0038 NL	1	5.1.4		Te	The last sentence states that the instrument should be automatically inhibited. We propose to add a condition when the instrument could be put into operation again.	Add after the last sentence: Either this condition is met automatically for each measurement or the instrument is automatically inhibited until action has been taken to put the instrument to zero or in the ready condition.	Accepted.
0039 NL	1	5.1.5		Te	We believe that printing should be added to the clause	Change into “As soon as the instrument indicates, prints, stores or transmits the measurement results after the warm-up period following switch-on, the results shall be within mpe. ”	Accepted.
0040 NL	1	5.2.1	(a)	te	For indicators and printing devices it is desirable to make a distinction between automatic and semi-automatic instruments.	Change (a) to: A semi-automatic instrument shall have an indicator which displays the measurement results.  An automatic instrument shall have either: <ul style="list-style-type: none"><li>• a printer which prints the measurement results</li><li>• a data storage that stores the measurement results</li></ul>	Not accepted. With no visible, built-in indication, there is no way to inspect the instrument without connecting additional equipment to view the data storage.
0041 NL	1	5.2.1	(b)	Ed	Reference to “It” is not unambiguous.	Change “It” to “An instrument”.	Accepted.
0042 NL	1	5.2.1	(b)	Ed	Reference to stable equilibrium is not applicable. (copy-and-pasted from weighing instruments).	Delete the sentence “Printing or storage of indications for subsequent indication, data transfer, totalising etc. shall be inhibited when the instrument equilibrium is not stable.”	Accepted.
0043 NL	1	5.2.1	(d) (e) (h)	Te	Full support for data storage as replacement for printing.	Change (d) to: “The indication shall be automatically displayed, stored or printed out following ...” Change (e) to: “....etc. may be displayed, stored or printed out.” Change (h) to: “Storage, printing and data transmission shall be restricted while the...”	Not accepted. See response to comment 0040 NL.
0044 NL	1	5.2.1	(e)	Ed	The last sentence seems to duplicate 5.2.1 (d)	Change to one sentence: Other indications such as dimensional weight, weight conversion factors etc. may either be automatically displayed or printed out following an appropriate step in the process, or be readily available by a simple action of the operator.	Accepted.
0045 NL	1	5.2.1	(f)	Te	Limit this requirement to semi-automatic instruments.	Change to: “On a semi-automatic instrument the indicated measurements for an object must persist long enough ....”	Not accepted. See response to comment 0040 NL.
0046 CA	1	5.2.1 (c )		ed	Measurements provided by a multidimensional measuring instrument are used to establish a service fee based on measurement. There is no “direct sales”. This sentence should use the same vocabulary that is used in 5.2.9.1 (i.e. when customer present...)	(c ) <del>In the case of an instrument used for direct sales to the public,</del> <b>When the customer is present during the measurement process,</b> all indications shall be available to the customer.	Accepted.
0047 CA	1	5.2.1 (c ) and 5.2.9.1		ge	Customer presence: these 2 requirements have to do with information available to customer and should be in the same section. We suggest to locate them in 5.2.9.1	Move 5.2.1 (c ) to 5.2.9.1	Accepted.
0048 CA	1	5.2.1 (f)		ed	The term “indicated measurement” can be replaced by our newly defined word “indication”.	(f) The <del>indicated measurements</del> <b>indications</b> for an object must persist long enough so that they may be easily read by an observer. The indications should be clearly assignable to a specific object.	Accepted.
0049 CA	1	5.2.1 (h)		ed	The principle behind this requirement is: you can’t print when device is in extended mode. The way it’s written, it may lead to confusion. Change the word “restricted” to “shall not be permitted”.	(h) Printing and data transmission shall <del>not be restricted</del> <b>permitted</b> while the extended indicating device is in operation. Instruments used for direct sales to the public shall not have any extended indicating device.	Accepted.
0050 CA	1	5.2.1 (h)		ed	Re-phrase to remove the expression “direct sale to public”	Instruments used for <del>direct sales to the public</del> , <b>when the customer is present during measuring process</b> , shall not have any extended indicating device.	Accepted.
0051 NL	1	5.2.2		Te	We don’t understand the requirement that digital indication should be stable around the changeover points or what technical solution is foreseen to meet this requirement.	Please clarify	Accepted with modification. The first sentence of 5.2.2 would only apply to devices that have “live” display. It ensures that readings near the midpoint of a scale interval are not constantly flipping between two indications. There are few (if any) MDMDs that have a live display. Suggest deleting the first sentence.

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0052 DE-5	1	5.2.4		te	Comment on 2 CD: Implementation of a dynamic scale interval for each axis in steps mentioned in the first sentence (1,2 or 5 x 10n). Proposed change: depending on: -Dimension e.g. special height detected via Photo-eye -Speed -Shape: cubic / irregular Convener response. Not accepted. The suggested wording is quite specific and restricts the use of the instrument. The current wording is more open. However, if there is a requirement for adding the specificity, can you provide more information as to the applicability?	First Comment is lapsed, but we see problems with 5.2.4 (c) we see also the necessity for a solution $d_{x1} \neq d_{y1} \neq d_{z1}$ , ... <b>example:</b> first range: 5 / 5 / 2 second range 20 / 10 / 5 <u>reasons for different scale intervals:</u> <ul style="list-style-type: none"><li>high information density by small objects and low information density for big objects, additionally dependent on the measuring principle</li></ul> disturbances have sometimes a stronger impact on big objects, additionally dependent on the measuring principle	Accepted with modifications. Multi-interval instruments section has been updated with new wording, but requirements maintained. However, some requirements are not applied when device is capable of displaying (in a test mode or otherwise) the value of the scale interval attributable to each of the displayed measurements.
0053 FR-3	1	5.2.4		tech	Paragraph 5.2.7 about multi-interval instruments specifies “ for each partial measuring range, the following apply: (a) scale intervals $d1 < d2 < d3 \dots < dr$ ; and (b) min = min1, max = max r, max1 = min2, etc.”  In the 5.2.4, the case of a multi-interval with $dx1 = dy1 = dz1$ , $dx2 = dy2 = dz2$ , ... , $dxr = dyr = dzr$ ; is mentioned and we wonder if there is any specification regarding the min and the max as 5.2.7 is not applying.	Add at the end of paragraph 5.2.7  Specified if relevant for scale interval $dx1 = dy1 = dz1$ , $dx2 = dy2 = dz2$ , ... , $dxr = dyr = dzr$ the value of max (max <sub>x1</sub> , max <sub>y1</sub> , max <sub>z1</sub> , max <sub>x2</sub> = max <sub>y2</sub> = max <sub>z2</sub> , ... , max <sub>xr</sub> , max <sub>yr</sub> , max <sub>z</sub> )	Accepted. Multi-interval section has been reworded to improve clarity.
0054 NL	1	5.2.4	B	Te	The requirement alternatively indication of incorrect use shall be given is not very clear, we propose to reword this.	Change: alternatively an visible warning should be given if the instrument is outside its operating range.	Accepted with modification. Reworded as “Alternatively, a visible warning regarding incorrect usage shall be given”
0055 NL	1	5.2.5	3 <sup>rd</sup> paragraph	Ed	This allows for indications like 40,000 mm while d = 2 cm.  We propose to adopt the requirement from OIML R 76 -1:2006 clause 4.2.2.2.	Change the paragraph to: The unit of measurement shall be chosen so that indications have not more than one non-significant zero to the right. For indications with decimal sign, the non-significant zero is allowed only in the third position after the decimal sign. For multi-interval instruments these requirements apply only to the range with the smallest scale interval.	Accepted with modification. Section 5.2.5 has been updated to with new wording that restricts the number of fixed zeroes. This limits the difference between the measurement capacity units and the scale interval units.
0056 NL	1	5.2.5	3 <sup>rd</sup> paragraph	ed	(if the comment above is not acceptable) The word “please” is not appropriate.	Change to “Please note that all the decades ...”: “Note: All the decades ....”	Accepted.
0057 JP2	1	5.2.5 Decimal numbers		te	We request that a format of numbers using “zero padding” method be permitted because some downstream numerical processes (or devices) need such a format for converting the data correctly. Examples of the zero-padding method are “000.123”, “001.234” and “012.345”, where unnecessary zero is added to maintain a fixed number of digits.	Add “at least” to the first two paragraphs as shown below in order to allow the zero-padding method. This expression was included in 2CD.  <i>If the indication is expressed in a decimal form, there shall be <u>at least</u> one zero preceding the decimal mark for values less than one.</i>  <i>The decimal mark on tickets shall be printed out with the measured value by the printer, with <u>at least</u> one zero preceding the decimal mark for values less than one.</i>	Accepted.
0058 NL	1	5.2.6		te	Full support for data storage as replacement for printing. Avoid the use of quantity value because we have the definition of “indication”.	Change first sentence to: “Displaying, storing or printing the indication ....”	Accepted with modification. Amend first sentence to: “Displaying, storing, <u>transmitting</u> or printing the indication ....”
0059 NL	1	5.2.6		te	Question: Should this include measurements on objects that exceed the object limitations of the instrument? For example: if the instrument cannot measure irregular shapes correctly, is it allowed to display, store or print dimensions together with an error message?	If the answer is yes add a paragraph: “Displaying, storing or printing the quantity value of any dimension shall either be inhibited, or an error message shall be included together with the measurement indication, when the object does not meet the limitations of use of the instrument.	Not accepted. This would require devices to determine if they are “allowed” to measure an object, which is a significant technical hurdle and would represent a dramatic change in requirements. Some currently certified technologies would not be able to meet that requirement.
0060 CA	1	5.2.6		ed	Limits of indications: if we use shorter instead of smaller in sentence (a), then we should use longer instead of larger in sentence (b)	(b) is <del>larger</del> <b>longer</b> than the maximum dimension marked on the device plus 9d; or	Accepted.
0061 NL	1	5.2.6	(c)	ed	The listing is limited to the “axis being measured”, therefore item (c) duplicates (a) and (b).	Delete item (c).	Not accepted. 5.2.6 (a) & (b) relates to axis whilst c) relates to overall measurement capability of the instrument.
0062 NL	1	5.2.8		te	The multi-instrument system shall be allowed only for automatic instruments.	Change the first sentence to: “A number of measuring devices may be connected to one indicating device to form an automatic multi-instrument system.”	Please provide more information. Looks like a good idea but need more information to justify the requirement.
0063 CA	1	5.2.8		ed	Multi-interval instrument: we propose the following text equivalent for 5.2.8 (a) and 5.2.8 (b). We feel it may be clearer for some readers.	<ul style="list-style-type: none"><li><b><u>the value of the scale interval of every partial measuring range must be less than the value of the scale interval of the subsequent partial measuring range (<math>d1 &lt; d2 &lt; d3 &lt; \dots &lt; dr</math>);</u></b></li></ul>	Accepted.

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						<ul style="list-style-type: none"><li>• <u>the maximum dimension of every partial measuring range must be equal to the minimum dimension of the subsequent partial measuring range (min = min1, max = max r, max1 = min2, etc.);</u></li><li>a)<ul style="list-style-type: none"><li>• <u>the minimum dimension of any axis must be equal to the minimum dimension of the lowest partial measuring range of that axis; and</u></li></ul></li><li>b)<ul style="list-style-type: none"><li>• <u>the maximum dimension of any axis must be equal to the maximum dimension of the highest partial measuring range of that axis.</u></li></ul></li></ul>	
0064 CA	1	5.2.8		te	The minimum dimension of each partial measuring range should also meet the limitations found in 4.1.1 (i.e. 10d, 20d, 50d, depending on the scale interval). This prevents partial measuring ranges with a smaller division size allowing a smaller minimum dimension for a larger range than would otherwise be allowed.	The minimum dimension of any partial measuring range may be no smaller than the minimum dimension specified in 4.1.1, based on the scale interval of the partial measuring range.	Accepted.
0065 NL	1	5.2.9.1		ed	The first sentence is a requirement not a sub clause title.	Add a sub clause title.	Accepted.
0066 NL	1	5.2.9.1	(b)	ed	Typo	Change “of” to “or”	Accepted.
0067 NL	1	5.2.9.2		ed	The first sentence is a requirement not a sub clause title.	Add a sub clause title.	Accepted.
0068 CA	1	5.3.1		ge	Nameplates: instruments are getting smaller all the time. Sometimes, no room is left for all the information to be marked on the instrument. We suggest the following heading:	<del>Instruments shall be clearly and permanently marked on a permanently attached nameplate in the vicinity of the indicating device with the following information.</del> <b><u>Instruments, or a descriptive nameplate permanently affixed to it, must be permanently marked with the following information so that it is clearly visible at all times:</u></b>	Accepted.
0069 NL	1	5.3.2		Te	We do not agree that all this information can be in the technical documentation as is stated now as a possibility. We propose to reword this and separate issues that shall be marked and which may be in the operator manual.	Change into: Marked on the instrument: (a) special application if used for a purpose other than determining postage, freight or storage charges; (b) minimum spacing between successive objects; (c) if whether the instrument can measure only rectangular boxes; (d) if whether the box has to be located in a particular position; (e) any limitation of the surface characteristics of the objects being measured  Either marked on the instrument of specified in the operators manual: (f) that the dimensions and/or volume shown are those of the smallest rectangular box that fully encloses the object; and (g) that the dimensional weight is a calculated value obtained by applying a conversion factor to the object's volume or dimensions.	Accepted with modification. The information specified in ‘a to e’ must be marked on the device. The information in f and g must be provided on printed tickets.
0070 CA	1	5.3.2		ge	Technical specifications: we believe that all specifications or limitations related to usage of the instrument should be, at a minimum, on the instrument itself or where the operator can see them. Leaving this information in the operator’s manual only is not sufficient. Remove all “and/or” and “operator’s manual” reference.	Any specifications or limitation of use relating to the instrument or the objects being measured shall be visibly and clearly presented to the operator on the instrument <del>and/or in an operator's manual</del> . Such specifications or limitations could include, but not be limited to:	Accepted.
0071 NL	1	5.4.1		Te	We do not agree of putting the place of the verification marks in the operating manual. It should either be marked on the instrument or defined in the Type-Approval Certificate.	Delete reference to the operating manual.  If technical reasons restrict or limit the verification mark(s) to be fixed only in a “hidden” place (e.g. when an instrument – in combination with another device – is integrated in other equipment) this can be accepted if these marks are easily accessible, and if there is a legible notice provided on the instrument in at a clearly visible place that points provides direction to these marks or if its location is defined in <del>the operation manual</del> , the OIML Certificate and OIML Test Report.	Accepted.
0072 NL	1	5.5		ed	Copy-paste error.	Change “Measuring instruments” in the first sentence to “Multi-dimensional measuring instruments”	Accepted.

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Country Code <sup>1</sup>	Part	Clause/ Subclause	Paragraph/ Figure/Table	Type of comment <sup>2</sup>	Comments	Proposed change	Convener's responses
0073 NL	1	6		Te	Since sealing in article 5.4.2 is deleted and moved to chapter 6 it might be interpreted that only software controlled instruments needs to be secured. We believe this is not correct. We propose to add a separate chapter with the title Securing or reinstate chapter 5.4.2 since this covers the sealing of hardware parts.	Reinstate 5.4.2 or Change the title of 6 in Requirements for software controlled devices.  Change 6.4 in 7 and change the title to securing.  Change 6.4.3 into 6.4.2	Accepted. Agree that sealing provisions and software sections should be separate. However, need to be discussed at the meeting on the best way to re-organise.
0074 NL	1	6		Te	This chapter is outdated. We propose to rewrite this chapter to reflect the latest proposal covered by the D31, see <a href="#">TC 5/SC 2/p 3</a> . We added a proposal at the end of this document.	See Annex I of this document.	Accepted.
0075 CA	1	6.00		te	Software section: we propose this to be based on OIML D 31. We believe that the basic requirements are covered but language should be based on pre-existing documentation.	A draft of R 129 with proposed new language is included for sections 6.1 and 6.2 based on D 31 2008. More work is required and final version of R129 should be based on new version of D31 which is also under review.	Accepted.
0076 NL	1	6.1	(d) & (f)	ed	The purpose of OIML documents (D 31) is to set software requirements that shall be transferred to (copied into) recommendations (R 129-1). It is not the intention to set requirements by referring to D 31 only. The reference shall be replaced by copies of the D 31 text.	Copy the requirements from D 31:2008 clause 5.2.5 and 5.2.1.2 into R 129-1.	Accepted.
0077 NL	1	6.1	(e)	te	The requirement is more strict than in clause 5.6.1.	Change (e) to: <b>When a significant fault is detected the instrument shall respond as in clause 5.6.1</b>  Or change (e) to: Further measurements shall not be possible when an inadmissible software variation is detected.	Accepted. Agree with the first proposed change (highlighted green).
0078 NL	1	6.1	(h)	ed	This is a note to bullet (g) that shall not have its own bullet.  Include a reference to the bibliography for D 31.	Change the layout.  Change D 31 to D 31[4].	Accepted.
0079 NL	1	6.2	(b)	ed	This is a note to bullet (a) that shall not have its own bullet.	Change the layout.	Accepted.
0080 NL	1	6.3	(a)	ed	This is a requirement that shall not have its own bullet.	Change the layout.	Accepted.
0081 NL	1	6.3	(b)	te	The purpose of OIML documents (D 31) is to set software requirements that shall be transfereed to (copied into) recommendations (R 129-1). It is not the intention to set requirements by referring to D31 only. The reference shall be replaced by copies of the D 31 text.	Copy the requirements from D 31:2008 clause 5.2.3.2 into R 129-1.	Accepted.
0082 JP3	1	6.3 Data transmission	(a)-(e)	Ed	Because the first paragraph is an explanation of the following four paragraphs, the number "(a)"is not necessary for the first one.	Delete "(a)" from the first paragraph and renumber the following paragraphs using the numbers from (a) to (d).	Accepted.
0083 JP4	1	6.3 Data transmission	(e)	te	An interruption of data transmission is not a problem of the measuring instrument but a problem of the transmission system. We request to allow the instrument continue measurement regardless the data transmission if an alternative method (storage or printing of the data) is provided.	Recommend changing the expression as shown below.  <i>(e) If a transmission interruption occurs because the network services become unavailable, no measurement data shall be lost. The measurement process should be stopped, <u>or the data should be recorded until the network service becomes available</u> to avoid the loss of measurement data.</i>	Accepted.
0084 NL	1	6.4.1		te	The method for electronic seals is not complete. When a counter is used there is no way to check the current value with the reference value (the value that was valid during the last verification). See R 129:2000 clause 9.2 (e). See also D 31:2008) clause 5.1.3.2.d example 1.	Add requirement R 129:2000 clause 9.2 (e) to the list.	Accepted.
0085 FR-4	1	6.4.1		ed	This paragraph 6.4.1 is dealing about sealing. As it is in the part 6. dealing about software it could be understand that it is only applying for software. Sealing instrument is mad to protect the measuring instrument against any unauthorized modification, readjustment, removal part etc.	This part has to be replaced as it was in the previous version at the part 4 (verification mark and sealing) as part 4.2.	Accepted. Please refer to response to comment 0073 NL.
0086 NL	1	6.4.1	(a) & (a)	ed	Repeated bullet numbering.	Correct bullet numbering.	Accepted.
0087 AT	1	6.4.1	06.4	Edit.	Ed. error	Change the numeration to <b>(b)</b> any access...	Accepted.
0088 NL	1	6.4.2		Ed	The last two sentences are either one note or two separate notes.	If one note: remove the blank line. If two notes: number the notes (note 1 & note 2) and give them the same layout.	Accepted.
0089 NL	1	6.4.2	(a)	ed	This is a requirement that shall not have its own bullet.	Change the layout.	Accepted.
0090 NL	1	6.4.3	Table 3 Row 12	Ed		Remove the example of the spectrometer as it is not relevant.	Accepted.
0091 NL	1	A.2		te	This is related to clause 5.2.6. The current version of R 129-1 is not clear on the acceptable behaviour of the instrument when measuring irregular shaped objects. Of course the correct determination of the smallest rectangular box is acceptable (option 1).	<b>(none)</b>	Not accepted. The object limitations are user requirements. The device is not expected to act on inappropriate objects provided for measurement.

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					Detection of irregular shaped objects and not giving an indication is also acceptable as this is detecting a significant fault and acting upon it (option 2). It also seems acceptable to limit the instrument to measuring rectangular boxes only, in which case this shall be marked on the instrument or in the operating manual and the operator shall be trained (option 3). But especially for automatic instruments there is no designated operator and it is very well likely that irregular shaped objects will be presented to the instrument. Is it now acceptable to display, store or print out wrong measurements (option 4)? Or shall these measurements be displayed, stored or printed with an error message (option 5)? This issue exists also for all other surface characteristics that lead to object limitations for the instrument.		
0092 UK	1	Annex B	Bibliography	ed	If proposal to 4.1.7 is accepted, insert biography for GUM	Insert bibliography, for example  22. Guide to the Expression of Uncertainty in Measurement, JCGM 100:2008. GUM 1995 with minor corrections	Accepted.
0093 NL	1	Whole document		Ed	The numbering of the sub clauses is not aligned with the text. For example 2.1.2 should refer to <b>device</b> but it is listed at the next term (measuring instrument).  As a consequence mistakes are easily made in the comments on this 3CD.	Correct the numbering	Accepted.
0094 FR-2	1 and 2	4.2.1		tech	There is no requirement about condensing in the part 1, and no test to verify this requirement. It should be interesting to add such requirement for this instrument. The manufacturer shall specify whether the instrument is designed for condensing or non-condensing humidity.	Please add a requirement about condensing in the part 1 paragraph 4.2 influence factor replace “(c) relative humidity of 85% at high temperature limit” by “(c) relative humidity of 85% (non-condensing) or 93% (condensing) at high temperature limit” and add the test procedure for damp heat, cyclic (condensing) present in D11, 10.2, Table 9, in the annex A of part 2	Please provide more information as to the necessity of the requirement.
0095 UK	2		General	ed	Sub-clauses are not aligned correctly with the titles	Please align the sub-clauses with the titles	Accepted.
0096 NO	2	1.4		te	We agree with secretariat observation regarding expanded test mode of 1/10 <sup>th</sup> scale interval should be permitted to use test objects other than NXd.	Add test mode in 1.4.2	Accepted.
0097 NL	2	1.4.10		Ed	Adjust the references in accordance with B6-2:2012 clause 6.4.2 and 6.4.3	R 129-1 clause 5.5.2	Accepted.
0098 NL	2	1.4.2		Te	We agree with the secretariats observation / proposal	Add the proposal to 1.4.2.	Accepted.
0099 CA	2	1.4.2		ge	Test objects: we strongly re-iterate the comment we made on CD2:  “The Canadian experience shows that 1/5 mpe is very hard to achieve. Reaching this requirement results in costly (hard to find material that is rigid enough), heavy (nature of materiel makes manipulating the objects results in injuries to personnel) and non-durable (even the best material, after a few runs, breaks easily) test objects. We currently have a 1/3 mpe requirement that we feel is the maximum we can achieve with the material available. We have to consider this: these test objects are not made to be looked at. Even with the most delicate handling, the dimensioning process makes the test objects take a severe beating.”  In plain language: requesting a 1/5 MPE is something we just can’t achieve for our test objects.  Again, we strongly suggest 1/3 mpe.	1.4.2 Test objects  The test shall be carried out using appropriate test objects of various sizes and of stable dimensions. The test objects shall be opaque, rigid and with flat faces and well defined straight edges. Test objects may consist of rectangular boxes with dimensions which are known to an expanded uncertainty (coverage factor k = 2) of not more than one- <del>four</del> <b>third</b> of the mpe.	Accepted. Uncertainty on test objects is limited to 1/3 mpe.
0100 NL	2	1.4.3		Te	Feedback for the acceptable indications for instruments that are tested with an expanded test mode of 1/10 <sup>th</sup> of the scale interval.	For instruments with an expanded test mode of 1/10 <sup>th</sup> of the scale interval, the error prior to rounding is calculated by using the following formula:  E = reference – indication  Where reference is the know dimensions of the test object.  For the evaluation of the result $E \leq mpe$  The calculation shall be made separately for the length, width and height.	Accepted.
0101 NL	2	1.4.4		Ed	Sentences three and further copy requirements from R 129-1 clauses 4.2 and 4.3 and are also included in A.1.3 to A.1.6. Why do we need this here?	Keep only the first two sentences.	Not accepted. Light and sound are not classified (currently) as either an influence factor or a disturbance, so the additional sentences are required. Also, see response to comment 0035 NL.
0102 NL	2	1.4.4		Ed	Adjust the references in accordance with B6-2:2012 clause 6.4.2 and 6.4.3 (4 times)	R 129-1 clause 4.1.2 R 129-1 clause 4.2.1 R 129-1 clause 4.3 R 129-1 clause 4.3.4	Accepted.
0103 NL	2	1.4.4		Ed	Typo	Remove the opening bracket before “..(and humidity effects.. ”	Accepted.

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0104 NL	2	1.4.4		Ed	Remove the text “and humidity effects” as this is already defined as influence factor (R129-1 clause 4.2.1).	Remove the text “and humidity effects”.	Accepted.
0105 NL	2	1.4.4		Ed	Because light and acoustic effects are defined as disturbances (see R129-1 clause 4.3.4) they shall not be listed separately in the title	Change title to “Tests for influence factors and disturbances”	Accepted.
0106 JP6	2	1.4.4 A.1.2 A.1.3 A.1.5		te	The following statement appears several times.  <i>Before a test is conducted and without a test object on the instrument, the instrument shall be in a zero or ready condition.</i>  Some instrument shows a message "ready for measurement" even if the previous data is shown on the display. We request such a state is regarded as a 'ready condition'.	This is a confirmation. If our request is acceptable, we will not request any changes of the text.	Accepted. National authorities can specify that 'previous data plus “ready for measurement” is an acceptable ready condition’.
0107 NL	2	1.4.9		Ed	Adjust the references in accordance with B6-2:2012 clause 6.4.2 and 6.4.3	R 129-1 annex A	Accepted.
0108 UK	2	2.1.3		ed	The title of this sub-clause reads like a requirement  <b>“If a particular irregularly-shaped object is frequently encountered by an instrument then test object/s should be used that test the instrument’s measurement capabilities with respect to that frequently encountered object.Accuracy tests”</b>	Please clarify the title and align correctly with the sub-clause. Separate the requirement from the title of the sub-clause.	Accepted.
0109 NO	2	2.1.3		te	It is difficult to determine the dimensions of the frequently encountered irregular shapes on site during a verification with the necessary accuracy.	Please remove this requirement	Accepted.
0110 NL	2	2.1.3		ed	(in the current document this sentence is part of the title of sub clause 2.1.4) It is not feasible to determine the dimensions of the frequently encountered irregular shapes on site during a verification with the necessary accuracy. It is also very likely that the frequently encountered irregular shape is equal to N x d where N is a whole number.	Remove the requirement to test with frequently encountered irregular shapes.	Accepted.
0111 NL	2	2.1.4		ed	The full sentence is part of 2.1.3.	Change the layout so that only “accuracy test” remain as title of the sub clause.	Accepted.
0112 FR-5	2	2.1.4		ed	The title of this sub-clause is supposed to be only “Accuracy test” but it was mixed with the last sentence of the previous sub-clause	Please clarify the title, separate “If a particular irregularly-shaped object is frequently encountered by an instrument then test object/s should be used that test the instrument’s measurement capabilities with respect to that frequently encountered object” from the title of the sub-clause “Accuracy tests”	Accepted.
0113 FR-6	2	2.1.4		tech	In Paragraph 2.1.4 it’s written “Accuracy tests shall be carried out in accordance with test A.1.2” but the title of the A.1.2 is “Test procedure for Repeatability” it doesn’t mentioned the possibility to test accuracy with it.	Please complete the title of Part 2 - A.1.2 with “Test procedure for Repeatability and Accuracy”	Accepted.
0114 NO	2	2.1.5		te	This requirement is suitable for type testing, not for initial verification. Shall not be mandatory	Not mandatory for initial verification.	Not accepted. All of the tests identified ensure that the device has been set-up and installed in a way suitable for that particular installation and use.
0115 NL	2	2.1.5		te	Why is there a reference to 1.4.2 (test objects)? It is already define in 2.1.3.	Remove the reference to 1.4.2.	Accepted.
0116 NL	2	2.1.5		te	The text “as required” is prone to different interpretations. It is also not the goal of initial verification to repeat all type evaluation tests. Preforming these tests shall not be mandatory. (proposed change adopted from R 76 clause 8.3.3)	Change the first sentence to: The following tests may be carried out in special cases.	Accepted. Wording changed to “as applicable”.
0117 NL	2	3		ed	The reference to clause 1.4.2 is unnecessary as it is included in clause 2.1.3.	Remove the reference to 1.4.2.	Accepted.
0118 NL	2	A.1.1		ed	What does applicability “General” mean?	Change “General“ to “All multi-dimensional measuring instruments” in all test procedures where it states “General”	Accepted.
0119 NL	2	A.1.1		ed	Why is there a reference to the test in the “object of the test” of the same test procedure?	Remove the reference to A.1.1	Accepted.
0120 NL	2	A.1.1		ed	The second sentence is more than a test level.	Change to: The test shall be performed at reference conditions (R 129-1 caluse 4.1.7(d)).	Accepted.
0121 NL	2	A.1.1		ed	The third sentence is an acceptance criterium	Move to the Acceptance criteria row.	Accepted.
0122 JP7	2	A.1.1, A.2.1.1, A.2.1.2, A.2.3, A.2.4, A.3.1, A.3.2, A.3.3, A.3.4, A.3.4.2, A.3.5.1, A.3.5.2, A.4.1 & A.4.2	All tables	Ed	Write the lowercase letter “c” for “criteria” in "Acceptance Criteria".	Correct "Acceptance <u>Criteria</u> " to "Acceptance <u>criteria</u> ".	Accepted.
0123 NL	2	A.1.2		ed	Why is there a reference to the test in the “object of the test” of the same test procedure?	Remove the reference to A.1.2	Accepted.

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0124 NL	2	A.1.2	Table A.1	ed	The table is not complete.	Change Battery voltage variations test into DC voltage variations test Insert A.3.4 Electrical surge test	Accepted.
0125 NL	2	A.1.2	Table A.1	ed	Harmonize terminology with D 11:2013  This effects also all titles in A.2 and A.3	Eg. AC power voltage variations AC mains voltage disp, short interruprions and reductions ..	Accepted.
0126 NL	2	A.1.2	Table A.1	ed	This table is not located properly as it is not a part of the test procedure for repeatability	Split the table in influence factor tests and disturbance tests. Place the table with influence factor test under A.1.3 and the table with disturbance tests under A.1.4. Adjust the text accordingly.	Accepted. Need to determine how to address light and acoustic tests, which are not classified as either an influence factor or disturbance.
0127 NL	2	A.2.1		te	Add a sentence that the test procedure for dry heat may be combined with the test procedure for cold and remove the necessity to do a test at 20 °C in between.	The test procedure for dry heat may be combined with the test procedure for cold using the following test level: (a) at a temperature of 20 °C following conditioning; (b) at the specified high temperature; (c) at the specified low temperature; and (d) again at 20 °C following conditioning.	Accepted.
0128 NL	2	A.2.1.1		te	Test level (c) is part of the cold test	Remove test level (c)	Accepted.
0129 NL	2	A.2.1.1		te	Why is there an alternative for the specified high temperature (30 °C) for the exposure duration?	Remove the alternative.	Accepted.
0130 JP8	2	A.2.1.1 A.2.1.2	Test level	Te/ed	Exposure duration may need over 2 hours depending on the device characteristics.	Recommend changing the expression as shown below.  <i>Exposure duration: <u>at least 2 h (following EUT stabilisation) at specified high temperature or 30 °C.</u></i>	Accepted.
0131 NL	2	A.2.1.2		te	Test level (b) is part of the dry heat test	Remove test level (d)	Accepted.
0132 NL	2	A.2.2		ed	Harmonize the wording of titles	Add the word test to the title.	Accepted.
0133 NL	2	A.2.2		te	The text for applicability seems to indicate that this test can be skipped.	Change applicability to “All electronic multi-dimensional measuring instruments”	Accepted.
0134 NL	2	A.2.2		te	Prevent that damp heat testing is performed at temperatures higher than 40 °C, as this is not specified in IEC 60068-2-78.	Change “at the specified high temperature (40 °C or other)” To: “at the specified high temperature (40 °C or lower if 40 °C is not included in the temperature limits)”.	Accepted.
0135 NL	2	A.2.4		te	Reference to D 11 is incomplete. It could be clause 12.1 as well as 14.1.	Either harmonize the title of the test with D 11 or update the reference to include the proper clause from D 11. (or even better, do both)	Accepted.
0136 NL	2	A.2.4		te	The test level “at various reduced voltages below nominal voltage” is open for interpretation	Change to “At the minimum battery supply voltage level and 90 % of the minimum battery supply voltage level.”	Accepted.
0137 NL	2	A.3.1		te	Test procedure and test level are outdated and do not match the referenced IEC 61000-4-11.	Update this test to match D 11 table 23 test level index 2.	Accepted.
0138 JP9	2	A.3.1 Test procedure for short time power reduction test		Te/ed	"Object of the test" does not match the actual objective and procedure of the test.	Recommend correcting the "object of the test" as shown below.  <i>Verification of compliance with the provisions in 4.2.1, Part 1 of this Recommendation and A.1.3 during <del>low supply voltage</del> <u>a short-time power reduction.</u></i>	Accepted.
0139 NL	2	A.3.2		te	Update the test levels to D 11 E2	(a) 2 kV for power lines (b) 1 kV for input/output .....	Accepted.
0140 NL	2	A.3.2		ed	Typo	Change “50 W” into “50 Ω” (greek capital letter omega)	Accepted.
0141 JP10	2	A.3.2 Test procedures for electrical bursts test		Te/ed	"Object of the test" does not match the actual objective and procedure of the test.	Recommend correcting the "object of the test" as shown below.  <i>Verification of compliance with the provisions in 4.2.1, Part 1 of this Recommendation and A.1.3 <del>during low supply voltage</del> <u>when an electrical burst is applied to the power line.</u></i>	Accepted.
0142 NL	2	A.3.3		ed	The second paragraph of the test procedure is not necessary and can be deleted. Reference to the IEC standard is sufficient.	Keep only: At least 10 discharges per preselected discharge location shall be applied. The time interval between successive discharges shall be at least 10 seconds.	Accepted.
0143 JP11	2	A.3.3 Test procedures for electrostatic discharge test		Te/ed	"Object of the test" does not match the actual objective and procedure of the test.	Recommend correcting the "object of the test" as shown below.  <i>Verification of compliance with the provisions in 4.2.1, Part 1 of this Recommendation and A.1.3 <del>during low battery voltage</del> <u>when an electrical discharge is applied.</u></i>	Accepted.
0144 NL	2	A.3.4.1		te	The test level describes the test procedure. The test level itself is missing.	Harmonize with D 11 table 27 test level index 3.	Accepted.
0145 NL	2	A.3.4.2		te	The test level describes the test procedure. The test level itself is missing.	Harmonize with D 11 table 29 test level index 3.	Accepted.

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0146 UK	2	A.3.4.2	Test Level	ed	The numbered list is not necessary since there is only one listing.	Please remove the numbered list (a) and have a second paragraph instead.	Accepted.
0147 NL	2	A.3.5.1		te	The test procedure is outdated.	Harmonize with D 11 table 32.	Accepted.
0148 NL	2	A.3.5.1		te	The test level is outdated	Harmonize with D 11 table 34 test level index 3 (Increase the frequency range to 3 GHz)	Accepted.
0149 UK	2	A.3.5.1	Test Level	te	The recommended test level of 80 to 2000 MHz do not cover situation where electromagnetic fields specifically caused by wireless communication networks.	The frequency test level specified in OIML D11 is 80 to 3000 Mhz which is expected to cover all wide beam and omni-directional emitting sources.	Accepted.
0150 NL	2	A.4.1		ed	The bullets (d) to (h) (test levels) are notes to the test levels (a), (b) and (c). The last paragraph is also a note.	Format (d) to (h) and the last paragraph as notes.	Accepted.
0151 NL	2	A.4.1		te	The acceptance criteria describe the behaviour of a significant fault instead of compliance with the mpe, which is consistent with the choice to characterise the light effects as a disturbance. But it is not consistent with the text in R 129-1 clause 4.3.4 and R129-2 clause A.1.6.	Make a clear choice for either: <ul style="list-style-type: none"><li>Compliance with mpe and do not allow alternative operations.</li><li>Compliance with the significant fault.</li></ul> The choice effects R 129-1 clause 4.3.4 and R129-2 clause A.1.6 as well.	Accepted.
0152 NL	2	A.4.2		te	This test is poorly documented. It has only small improvements over R 129:2000. Flaws in the description are: <ul style="list-style-type: none"><li>Where is the sound intensity level of 100 dB measured? At the noise source (feasible) At the transducer of the MDMI (not feasible from a distance of 1,5 m)</li><li>Sound level meters usually measure sound pressure. Sound intensity meters involves the use of two microphones located close to each other. That makes it difficult to measure the level at the source or at the transducer.</li><li>Alignment of the noise source with the MDMI is not addressed.</li><li>The test level description defines this a disturbance (due to the fact that bursts are used). For this kind of phenomena the compliance with the significant fault is much more appropriate.</li><li>There is no reference to international standards.</li></ul>	Discuss the necessity of this test. Topics for that discussion: <ul style="list-style-type: none"><li>Most MDMI’s that use acoustic techniques will be using ultrasonic sound (using audible sound will not comply with health and safety requirements). Are ultrasonic sounds a real life phenomenon that we have to test for?</li><li>It is very difficult to perform in a way that results are repeatable. It make the test expensive and puts an unnecessary burden on manufactures and issuing authorities.</li></ul> The result of the discussing should be a major improvement of the description of the test or removal of the test and appertaining requirements.	Accepted. Test has been reworted to better detail the procedure.
0153 NL	2	Annex A		ed	Adjust the references in accordance with B6-2:2012 clause 6.4.2 and 6.4.3 (several times throughout the whole annex)	R 129-1 clause ...	Accepted.
0154 NL	2	Whole document		Ed	The numbering of the sub clauses is not aligned with the text. For example 2.1.2 should refer to <b>device</b> but it is listed at the next term (measuring instrument).  As a consequence mistakes are easily made in the comments on this 3CD.	Correct the numbering	Accepted.
0155 NL	3	2.26		ed	The page caters for 1 measurement per object while the R 129-2 clause A.1.7 defines 3 measurements per object.		Accepted.

Convener’s response to comments received for Changes to R 129 from the May 2019 meeting

Country Code <sup>1</sup>	Part	Clause/ Sub clause	Paragraph/ Figure/ Table/	Type of comment <sup>2</sup>	COMMENTS	PROPOSED CHANGE	CONVENER’S RESPONSE
FR-1	1	2.2.8		tech	The conversion could be applied directly to the measured dimensions	Do not erase “or measured dimensions” at the end of the definition, keep the definition as it was : “calculated value obtained by applying a conversion factor to the object's dimensional volume (see 2.2.4) <u>or measured dimensions</u> .”	Accepted.
FR-2	1	4.2		tech	The tests must be in link with the temperature and humidity range and the manufacturer has to decide the temperature and humidity range.  This new sentence could be interpreted as it is allow to have a higher temperature limit upper than 40° but only test instrument at 40°C. If there is safety concerned as it is mentioned in the rationale upper 40°C and the instrument only test at this temperature it should be marked on the instrument.	The sentence should be keep as it was before : “c) relative humidity of 85% at high temperature limit.” with no reference to a threshold of 40°C.	Not accepted. The test is for relative humidity not temperature. As the rationale provided suggests, having a relative humidity of 85% at temperatures more than 40°C is a safety concern, as at higher temperatures, to achieve a relative humidity of 85%, absolute humidity has to be much higher.

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Country Code <sup>1</sup>	Part	Clause/ Sub clause	Paragraph/ Figure/ Table/	Type of comment <sup>2</sup>	COMMENTS	PROPOSED CHANGE	CONVENER'S RESPONSE
DK-1	1	4.1.6(a)		tech	<p>The International Recommendation OIML R 129 on Multi-dimensional measuring instruments has a clear inconsistency with the consequence that it is impossible to meet the requirements of the recommendation for instruments without a device for displaying the indication with a smaller scale interval. The requirement in 4.6 (a) that uncertainty of error in the indications of measurement, <math>U \leq d/3</math>, can never be met unless the instrument has a device for displaying the indication with a smaller scale interval (better resolution).</p> <p>This issue could be resolved in the following ways:</p> <p>1) OIML R129 could be rewritten so that it only gives requirements on the uncertainty of the size of the test objects. This would be in line with e.g. OIML recommendations for weighing instruments. The requirement could be relaxed to "...the errors on indications of dimensions shall not be greater than two-third of the mpe specified (see GUM)".</p>	Denmark has previously commented on R 129 in 2014. I will forward these comments ones again since the issue seems to be the same as then. I am not sure if the subject has already been dealt with in the new revision of R 129, otherwise please give this your attention.	Accepted. Uncertainty for test objects is defined in Part 2. Characterizing the uncertainty of the indication may not be possible and would mandate use of an enhanced resolution mode (which this recommendation does not require). The requirement relating to the uncertainty of the error has been removed.
FR-3	1	5.1.4		ed		Please, add a sentence for automatic instrument as "For automatic instruments the zero or ready condition shall be indicated by a zero indication, a ready light or a similar display before the first measurement".	Not accepted. Please see the rationale provided in the 'Change to R129 meeting' document. However, if this is important please provide more clarification and information as to automatic instruments being specified.
FR-4	1	5.2.5		tech	<p>This process could be complicate for some user.</p> <p>It is simpler for them if the units stay the same and do not depends of the object.</p> <p>Nevertheless: this proposal could be in option.</p>	<p>Please do not change the beginning of the sentence.</p> <p>Keep "<b>One or more fixed zeros</b> may be used to the right of the variable numbers for values greater than one."</p>	Not accepted. The change proposed is to avoid inaccurate measurements due to misrepresentation of the precision. Please see rationale provided in the 'Change to R129 meeting' document.
FR-5	1	5.2.6		tech	<p>This new definition is not related with any definition of the actual recommendation; it is introducing a new characteristic which is not tested: what is it "capable of measuring an object"? It is link with the maximum and minimum dimensions tested?</p> <p>This new definition is not clarifying and expanding the meaning of part (c) as it is mentioned in the rationale.</p>	<p>The point c) should be keep as it was, only the Note could be add :</p> <p>"Displaying or printing the quantity value of any dimension shall either be inhibited, or an error message shall be included together with the measurement indication, if the axis being measured:</p> <p>(a) is shorter than the minimum dimension marked on the device; or</p> <p>(b) is larger than the maximum dimension marked on the device plus 9d; or</p> <p>(c) has dimensions that exceed the measurement capability of the instrument.</p> <p>Note: The national responsible body may specify the acceptable option with regards to either inhibiting or allowing measurement indication with error message.</p> <p><del>Displaying, storing, transmitting or printing the quantity value of any dimension shall be inhibited if the object, or a portion of the object, is outside the measuring area of the instrument.</del></p> <p><b>Measuring Area (to be added to definitions)</b></p> <p><del>The area in or around the instrument where it is capable of measuring an object."</del></p>	Accepted. Note added.
FR-6	1	5.2.9.1		tech	<p>We disagree, according to the point a) of 5.2.1 " An instrument shall have either:</p> <ul style="list-style-type: none"><li>• an indicator which displays the measurement results</li><li>• a printer which prints the measurement results"</li></ul> <p>So some requirements have to be fixed for "display", we agree also to fixe requirements for the stored data.</p> <p>An instrument should also display sufficient information to identify the transaction.</p> <p>The last two paragraphs, are comments or they are new paragraphs in the recommendation? It is not clear as it is written.</p>	<p>Please, add "display" in the sentence :</p> <p>"Any printed ticket, displayed or stored measurement result shall include at a minimum:</p> <p>a) dimensions: length (L), width (W) and height (H);</p> <p>(b) date, transaction number or other identification of the object.</p> <p>and, shall include the following, if used or calculated by the instrument:</p> <p>(c) price rate and price [...]"</p>	Partially accepted. Wording "Any displayed measurement results shall include at a minimum the measured dimensions" added to 5.2.9.1.
FR-7	2	1.4.3		tech	The first indication is not clear, the dimensions of the test objet couldn't be equal to the MPE.	<p>Please change the symbol inferior or equal (<math>\leq</math>) by the symbol strictly inferior (<math>&lt;</math>)</p> <p>"Indication – known dimensions of the test object <math>&lt;</math> mpe"</p> <p>And add after "the dimension of the test object must be at least 1/5 of the MPE in type/initial evaluation and at least 1/3 of the MPE in subsequent verification"</p>	Wording amended.
FR-8	2	A.2.2		tech	In the test level, it's written "the specified high temperature or 40 °C, whichever is lower, <del>(40 °C or other)</del> "	Change 40°C to Tmax	Not accepted. Ease of readability.
FR-9	2	A.2.X		tech	It should be Tmax and not 40°C (cf. previous comments FR-3).	Change 40°C to Tmax (cf. previous comments FR-2).	Not accepted.
FR-10	2	A.3.2		techn	Test of D11 dealing with " 50 $\Omega$ and 1000 $\Omega$ ", why not have the mention of "1000 $\Omega$ " ?	It should be expertise why this test is not align with the D11, if there is no reason please align with D11.	Not accepted.

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FR-11	2	A.3.3		techn	<p>In D11“time interval between successive discharges shall be at least 1 second “</p> <p>In EN 61000-4-2 mentioned: “For the time interval between successive single discharges an initial value of 1 s is recommended. Longer intervals may be necessary to determine whether a system failure has occurred.”</p> <p>In OIML R129 it is mentioned 10s.</p>	Align R129 with D11	Accepted.

Convener’s response to comments received for Software requirements for R 129

Country Code	Section	gen/ edit/ tech	COMMENT	Proposed change	Convener’s response
DE-1	Convener ’s proposal	gen	We are glad to have the software requirements as part of the OIML R 129. The software tests in Germany were performed against D31 or WELMEC guide 7.2. Marko Esche, head of the PTB working group "Metrological Software" and Secretariat of TC 5/SC 2 "Software" was involved in our comments. We are for option 1. No change to the wording in the document.		Thank you for the feedback.
FR-1	Convener’s proposal	gen	We are in favour of the option 1 but we suggest to align the documentation required with the D31 voted at the last CIML. Please find in yellow our proposal of modification from v1.6-clean	<p>This includes:</p> <ul style="list-style-type: none"><li>• a description of the legally relevant software and how the requirements are met:<ul style="list-style-type: none"><li>○ list of software modules that belong to the legally relevant part;</li><li>○ description of the software interfaces of the legally relevant software part and of the commands and data flows via this interface;</li><li>○ list of parameters to be protected and description of protection means;</li></ul></li><li>• a description of suitable system configuration and minimal required resources (see 6.12.1);</li><li>• a description of security means of the operating system (password, etc. if applicable);</li><li>• a description of the (software) sealing method(s);</li><li>• an overview of the system hardware, e.g. topology block diagram, type of computer(s), type of network, etc. Where a hardware component is deemed legally relevant or where it performs legally relevant functions, this shall also be identified;</li><li>• a description of the user interface, menus and dialogues;</li><li>• the software identification and instructions for obtaining it from an instrument in use;</li><li>• if an audit trail is realized in the software, a description on how to access the audit trail;</li><li>• the operating manual</li><li>• list of commands of each hardware interface of the measuring instrument/component;</li><li>• a description of the accuracy of the algorithms (e.g. filtering of A/D conversion results, price calculation, rounding algorithms, etc.);</li><li>• a description of datasets stored or transmitted;</li><li>• if detection of significant defects is realized in the software, a list of significant defects that are detected and a description of the detecting algorithm;</li><li>• if fault detection is realized in the software, a list of fault that are detected and a description of the detecting algorithm;</li><li>• list of durability errors that are detected by the software and if necessary, for understanding, a description of the detecting algorithms.</li></ul>	Thank you for the feedback. Accepted. Software requirements amended. Please see <i>OIML R 129 – 4 CD (parts 1 &amp; 2) on OIML website for vote and comments</i> for the incorporated changes.

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Country Code	Section	gen/ edit/ tech	COMMENT	Proposed change	Convener's response
DE-1	Convener 's proposal	gen	We are glad to have the software requirements as part of the OIML R 129. The software tests in Germany were performed against D31 or WELMEC guide 7.2. Marko Esche, head of the PTB working group "Metrological Software" and Secretariat of TC 5/SC 2 "Software" was involved in our comments. We are for option 1. No change to the wording in the document.		Thank you for the feedback.
NL-1	Convenors proposal	gen	We are for option 1. No change to the wording in the document.  Our reasons are: <ul style="list-style-type: none"><li>a. Creating quality software and maintaining software, bugfixes, patches, etc. requires documentation. Without this documentation I doubt that the manufacturer can create and maintain legally relevant software that meets the requirements.</li><li>b. Evaluating software starts with obtaining the necessary information. Without this documentation, a proper evaluation of the software is according to me not possible. <i>(An inter-comparison between test laboratories within WELMEC seems to underline this, comparable results between the test laboratories was only achieved ones we harmonized the documentation requirements and test procedures)</i></li><li>c. Related with point 2 is the acceptance of OIML certificates. I wonder what the impact is on the mutual acceptance under the OIML Certificate System if one test laboratory ask no documentation (only a manufacturers declaration) while another requires everything listed.</li></ul>	Implement option 1 in the document	Thank you for the feedback.
NO-1	Convenors proposal	gen	We think the draft software requirement is very important to have it in R129. So we support the work for proceeding CD4.		Thank you for the feedback.
US-1	Convener Proposal	gen	At the time of this submission from the US, France and the Netherlands have already commented on the Convener's proposal concerning R129 software documentation requirements ... but they seem to be the only two replies thus far on the closing date (25 Nov 2019).  We agree with both France and the Netherlands that we do <b>NOT</b> support either Option 2 (let the national authorities specify) or Option 3 (split the documentation requirements into some mandatory and some optional).  Further, we <b>do support</b> France's comment on this that the documentation requirements in R129 should be as closely aligned as possible with the latest version of D31 (the version that was just approved by the CIML in October 2019 and will soon be published).  Additionally, I will note that the R117 Project Group just went through this exact same exercise of deciding which software documentation requirements to include in R117 ... using D31 as guidance. The R117 PG spent quite a bit of time working on this, and several experts from the D31 PG assisted us. (R117 was also just approved by the CIML in Oct 2019.)  As an additional point of reference for the R129 PG, the list of software documentation requirements in R117 can be found in R117-1, Section A.4 (pages 82-83)  <a href="http://bratislava.oiml.org/ciml.html">http://bratislava.oiml.org/ciml.html</a>  (bottom of the webpage in a zip-file)		Thank you for the feedback.

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Country Code	Section	gen/ edit/ tech	COMMENT	Proposed change	Convener’s response
DE-1	Convener ’s proposal	gen	We are glad to have the software requirements as part of the OIML R 129. The software tests in Germany were performed against D31 or WELMEC guide 7.2. Marko Esche, head of the PTB working group "Metrological Software" and Secretariat of TC 5/SC 2 "Software" was involved in our comments. We are for option 1. No change to the wording in the document.		Thank you for the feedback.
FR-2	6.5.2	tech	Information required for the national authorities should be defined at the national level and not in the recommendation and moreover we are in favour to align with the D31 and do not go further.	Only the last part of this sentence should be kept “ <del>National authorities shall be informed about all functions and parameters</del> , No hidden or undocumented functions or parameters shall exist.”	Not accepted. Whilst the conveners do agree with the idea of aligning with D 31 as closely as possible, the reason this clarification was provided was to ensure that all functions and parameters should be available to national authorities, but the user do not need this information. There may be legal implications in some economies with this information available to all.
JP-1	6.5.3	tech	In general, it is extremely difficult to protect software-controlled measuring instruments against accidental changes of software.	Replace the word “accidental” with “unauthorized” following the original term used in D31: FDD.	Accepted. Software requirements amended. Please see <i>OIML R 129 – 4 CD (parts 1 &amp; 2) on OIML website for vote and comments</i> for the incorporated changes.
FR-3	6.5.3	edit	This part is only dedicated to legally relevant software so it useless to add “legally relevant” before software in this part. It is ambiguous. Moreover we proposed to align this part with D31 : we suggest to delete that sentence: “Legally relevant software and parameters shall be protected against accidental or unintentional changes.,” and some other modification	A software-controlled measuring instrument shall be constructed in such a way that possibilities for unintentional, accidental, or intentional misuse are minimal. <del>Legally relevant software and parameters shall be protected against accidental or unintentional changes.</del> 6.5.3.1 Software shall <del>be secured and</del> protected in such a way that evidence of any intervention (e.g. software updates, <b>parameters changes</b> ) shall be available. Software shall be protected against <b>unauthorized</b> modification, loading, or changes by swapping the memory device. Note: Updating the software of the measuring instrument or component is allowed if the requirements for updates are fulfilled, see 6.13. <b>6.5.3.2 Only clearly documented functions may be activated by the user interface, which do not influence the metrological characteristics of the instrument</b>  <b>6.5.3.3</b> Parameters that fix the legally relevant characteristics of the measuring instrument shall be <del>secured and</del> protected in such a way that evidence of an intervention shall be available. Displaying or printing of the current parameter settings shall be possible. <b>6.5.3.4</b> Measurement data and the measurand value, stored or transmitted, shall be protected against modification, see also 6.10 and 6.11 of Annex X. The measuring instrument or component shall be fitted with a checking facility to ensure that if a modification or corruption is detected, the measurement data and the measurand value shall be discarded or marked unusable	Not accepted. “Modification”, “misuse” and “intervention” imply a human action only. Software also need to be protected against corruption due to physical effects (e.g. defects in the memory due to aging). The text modified to cover both the eventualities and the information is provided in a note to 6.5.3.  Not accepted. This is only an example. Not providing an extra example does not deviate from D 31.  Accepted. Software requirements amended. Please see <i>OIML R 129 – 4 CD (parts 1 &amp; 2) on OIML website for vote and comments</i> for the incorporated changes.  Accepted. Software requirements amended. Please see <i>OIML R 129 – 4 CD (parts 1 &amp; 2) on OIML website for vote and comments</i> for the incorporated changes.
FR-4	6.5.6	tech	It is proposed to align with D 31 what the audit trail shall contain	The audit trail shall contain at minimum the following information: <ul style="list-style-type: none"> <li><b>Success/failure of updated procedure</b></li> <li>Time stamp of the event;</li> <li><b>Software identification of installed version</b></li> <li><b>Software identification of the previous installed version</b></li> <li>In the case of a software download <b>(update):</b></li> <li>See 6.2.6;</li> <li>In the case of a parameter change:</li> <li>Identification of the changed parameter;</li> <li>The old and new value of the changed parameter.</li> </ul>	Accepted. Software requirements amended. Please see <i>OIML R 129 – 4 CD (parts 1 &amp; 2) on OIML website for vote and comments</i> for the incorporated changes.
JP-2	6.10.3	edit	Clause numbers “5.2.9.1” and “5.2.9.2” do not exist. Clause number “6.8.1.5” is not correct either.	Correct the clause numbers “5.2.9.1” and “5.2.9.2” to appropriate numbers. Replace “6.8.1.5” with “6.8.2.5”.	Accepted. Software requirements amended. Please see <i>OIML R 129 – 4 CD (parts 1 &amp; 2) on OIML website for vote and comments</i> for the incorporated changes.
JP-3	6.10.5	edit	Clause numbers “5.2.9.1” and “5.2.9.2” do not exist.	Correct the clause numbers “5.2.9.1” and “5.2.9.2” to appropriate numbers.	Accepted. Software requirements amended. Please see <i>OIML R 129 – 4 CD (parts 1 &amp; 2) on OIML website for vote and comments</i> for the incorporated changes.
JP-4	6.11.3	edit	Clause numbers “5.2.9.1” and “5.2.9.2” do not exist.	Correct the clause numbers “5.2.9.1” and “5.2.9.2” to appropriate numbers.	Accepted. Software requirements amended. Please see <i>OIML R 129 – 4 CD (parts 1 &amp; 2) on OIML website for vote and comments</i> for the incorporated changes.

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Country Code	Section	gen/ edit/ tech	COMMENT		Proposed change		Convener's response
DE-1	Convener 's proposal	gen	We are glad to have the software requirements as part of the OIML R 129. The software tests in Germany were performed against D31 or WELMEC guide 7.2. Marko Esche, head of the PTB working group "Metrological Software" and Secretariat of TC 5/SC 2 "Software" was involved in our comments. We are for option 1. No change to the wording in the document.				Thank you for the feedback.
NL-2	6.13.3.6	tech	During an update the measuring instrument shall either function correctly within the maximum permissible error or the measuring functions shall be inhibited.		Change 6.13.3.6 to: During an update, the measuring instrument shall either function correctly within the maximum permissible error or the measuring functions shall be inhibited. Any existing audit trail information shall be retained, see also 6.5.5.		Accepted. Software requirements amended. Please see <i>OIML R 129 – 4 CD (parts 1 &amp; 2) on OIML website for vote and comments</i> for the incorporated changes.
JP-5	7.1.2	gen	Among the three NMIA's proposals on software documentation requirements, <u>we support Option 3.</u>				Thank you for the feedback.
NO-2	7.1	tech	We support to add a clause for software documentation as proposes in the N037		As proposed in option 1.		Thank you for the feedback.
FR-5	8	edit	France is in favour to add this part 8 and harmonize with the other recommendation, we suggest to structure this part differently		8 Metrological controls 8.1 Type evaluation 8.1.1 evaluation 8.1.2 certificate 8.2 Initial verification 8.3 Subsequent verification 8.4 In-service inspection		Thank you for the feedback. The software requirements were presented as standalone, to seek feedback on the requirements. Please see <i>OIML R 129 – 4 CD (parts 1 &amp; 2) on OIML website for vote and comments</i> for the incorporated changes.

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