

Template for comments and convener's observations

Date:2026-09-03

Document: D 31 2CD

Project: TC5/SC2/p5

Country Code ¹	Part	Clause/ Subclause	Paragraph/ Figure/Table	Type of comment ²	Comments	Proposed change	Convener's responses
0001 DE		3.2.4	Definition / Note 2	TE	Built for purpose devices may have an operating system, but that should be a subsequent module to the legally relevant application.	Proposed changes to note 2: If an operating system is present, it is a subsystem of legally relevant software and not directly accessible.	The decision, if an aspect of a measuring instrument is subject to legal control, should not be made in a definition. 6-3-8 already contains applicable instructions.
0002 JP-04		3.2.49		ed	The reference to the 2022 edition is outdated and should be updated to OIML B 18:2025.	Correct "OIML B 18:2022" to "OIML B18:2025".	Agreed.
0003 CA		3.2.54		ed	Font for the definition of sealing and "note" have to be corrected. <i>3.2.54 sealing means intended to protect the measuring instrument against any modification, readjustment, removal of parts or software, etc.</i> Note: This may be achieved by hardware, software or a combination of both.	3.2.54 sealing means intended to protect the measuring instrument against any modification, readjustment, removal of parts or software, etc. Note: This may be achieved by hardware, software or a combination of both.	The font will be corrected.
0004 JP-05		3.2.54, 3.2.64, 3.2.66		ed	Unexpected italic formatting appears in clauses 3.2.54, 3.2.64, and 3.2.66 (only in the clean version).	Change the italic formatting to upright text in these clauses.	The font will be corrected.
0005 IR		3.2.66	Definition	ed	Missing space/punctuation: the definition of "storage device" runs directly into the following note without a space, reading "...necessary to reconstruct the measurement resultNote: See Annex C for clarification...".	Insert a space (and period, if intended as a separate sentence) so it reads "...to reconstruct the measurement result. Note: See Annex C for clarification regarding measurement-related terms."	The formatting error will be corrected.
0006 US		3.2.73		Ed	The text should read "with a tablet" rather than "with tablet" in the example.	Insert "a" so that the example reads, "An electricity meter without a display communicates over a network with <u>a</u> tablet that is configured by software to act as the indication device."	The indefinite article will be added.
0007 DE		3.2.73	Example	TE	We would welcome a second example to highlight the universal device, that is usually equipped with a general-purpose operating system. Das Beispiel ist aus meiner Sicht schlecht gewählt, da wir Anzeigegeräte im Rahmen der Abgaslösung normalerweise nicht vollständig absichern.	Add a second example: An industrial PC that is used for the pre-processing of multidimensional measurement data. The data is transmitted from multiple sensors to indication via an Ethernet subnetwork.	Agreed. The example appears to be in line with the intention of the clause.
0008 AU		4.1		ge	OIML D 31 could also apply to the development of OIML Guides. E.g. OIML G 22.	Suggest including a Note along the lines of:	Agreed, although this should be normal descriptive text rather than a note.

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						"The provision of this Document may be used by OIML PGs in the development and revision of OIML Guides where relevant."	
0009 US		4.2	Last bullet	Ed	It may be more clear to specify that the certificate referred to here is a type evaluation certificate.	Consider instead modifying the bullet to read: "Certificate – guidance to PGs regarding software-related information to be included in a <u>type-evaluation</u> certificate issued in accordance with a Recommendation	OK
0010 DE		6.2.2.1	Example 1)	Ed	Original sentence: A version number has the following structure: A.Y.Z. considering a flow meter; the letter A will represent the version of the core software that is counting pulses; the letter Y will represent the version of the conversion function (none, at 15 °C, at 20 °C); the letter Z will represent the language of the user interface.	Rewrite for better grammar, to sound more technical and to better fit the style of an example: The version number of a flow meter has the following structure: A.Y.Z., where A represents the version of the core software that is counting the pulses, Y represents the version of the conversion function (none, at 15 °C, at 20 °C); Z represents the language of the user interface. Alternative, only the word 'letter' is deleted: A version number has the following structure: A.Y.Z considering a flow meter, where A represents the version of the core software that is counting the pulses, Y represents the version of the conversion function (none, at 15 °C, at 20 °C); Z represents the language of the user interface.	Thank you. The first option will be implemented.
0011 RU		6.2.2.1	p. 101 Table	ed	The table "PG actions and decisions" has the word "instrument" in the meaning "measuring instrument". It would be consistent to use the term "measuring instrument".	Insert the word "measuring" with the word "instrument" in the following paragraphs of the table: 6.2.2.1, 6.2.3.3.2, 6.3.2.1, 6.3.2.2, 6.3.3.1, etc.	Agreed. This will be corrected.
0012 AU		6.2.2.2	4 th para.	ed	Delete repeated word	Amend the clause as follows: "Documentation: The documentation shall contain a list of all ~~all~~ legally relevant functions and a description of how to access them."	The duplicate will be deleted.
0013 JP-01		6.2.2.26.2.3. 46.3.8.3.3	Documentati on:	Ed	In the Documentation paragraph, the phrase "all all legally relevant functions" contains a duplicated word and should read "all legally relevant functions".	Delete one of the duplicated instances of "all" in the phrase "all all legally relevant functions".	The duplicate will be deleted. The duplicate will be deleted.

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0014 PL		6.2.2.2	Last paragraph	ed	Word 'all' repeated twice in sentence: <i>Documentation</i> : The documentation shall contain a list of all all legally relevant functions and a description of how to access them.	<i>Documentation</i> : The documentation shall contain a list of all legally relevant functions and a description of how to access them.	The duplicate will be deleted. The duplicate will be deleted.
0015 IR		6.2.2.2, 6.2.3.4, 6.3.8.3.3	Documentati on	ed	The documentation requirements contain a duplicated word: "a list of all all legally relevant functions/parameters/software modules". This occurs in at least three places (6.2.2.2, 6.2.3.4, 6.3.8.3.3) and is echoed in the summary list in 7.1.2.	Delete the duplicate "all" so the text reads "a list of all legally relevant functions / parameters / software modules" in each instance, including the corresponding bullet points in 7.1.2.	The duplicate will be deleted. The duplicate will be deleted.
0016 DE		6.2.2.4	First sentence	Ed	Original sentence: The presentation of the measurement results shall be unambiguous for all parties affected. 'affected' doesn't really fit here, words like 'involved' or 'concerned' would.	Change 'affected' to 'involved'.	Agreed. "involved" appears to fit quite well.
0017 DE		6.2.2.4	Last (3 rd) guidance	Ed	PGs may also specify... The word 'also' is not necessary in this Guidance. In the context of "PGs may...", the word 'also' is not necessary anyway. If absolutely necessary, we could write 'additionally' at the beginning, which would sound more professional.	Guidance: PGs may specify the requirements for the display... Check other Guidances (6.3.9.3.2.).	OK. "Additionally" should not be needed.
0018 DE		6.2.2.5	Shared indications	TE	The chapter is also applicable for operating systems.	Add the following note: The indicated legally relevant information is distinguishable from other non-relevant information by means of the operating system.	This can be added as an additional example: "4) (II) The operating system ensures that indicated legally relevant information is distinguishable from other legally non-relevant information." This change should be voted upon in a minor change procedure.
0019 US		6.2.2.6	Example	Ed	The example as previously written matched the guidance. Without the suggestion of a testing requirement, the example is so simple as to be unnecessary.	Consider eliminating the example.	Since the requirement asks for a consistent format and the example does provide exactly that, the example appears to be valid.

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0020 US		6.2.2.6	Guidance	Te	The deleted text in the guidance refers to test methods, whereas this new text assumes that the requirements do not require any sort of testing. Does this matter? This same guidance has been moved to “setting the clock” (6.2.3.5), but in reality, accurately setting the clock is different from testing that the clock is continuing to run accurately.	Consider including in the guidance some reference to testing the clock here, rather than in 6.2.3.5.	Since the separation of 6.2.2.6 and 6.2.3.5 was discussed and agreed upon at the second PG meeting, we cannot revert the decision now. See B 6-1 clause 7.5.2.4 b). However, we can introduce a reference to accurate time keeping in 6.2.2.6 and change the title of 6.2.3.5 to “setting the clock and clock accuracy”. This will allow readers to easily find the accuracy Guidance in 6.2.3.5 and will keep 6.2.2.6 restricted to timestamps alone. This change should be voted upon in a minor change procedure.
0021 CA		6.2.3.2	Notes example 3	ed	3) (I)/(II) To prevent software on a memory device from being changed, the write-enable input of the memory device that contains the software is inhibited by a switch that can be protected by a hardware seal. The circuit is designed in such a way that the write protection cannot be cancelled by a short-circuit of contacts. Paragraph contains an extra space.	3) (I)/(II) To prevent software on a memory device from being changed, the write-enable input of the memory device that contains the software is inhibited by a switch that can be protected by a hardware seal. The circuit is designed in such a way that the write protection cannot be cancelled by a short-circuit of contacts. Delete extra line	Thanks. The extra space will be deleted.

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0022 DE		6.2.3.3.1		Ed	The clause should actually be part of 6.2.2 as it is clearly marked as a functional requirement.	Move 6.2.3.3.1 to a new clause 6.2.8 (or similar).	Correct. The separation into functional and “securing/protection” requirements appears to have failed here. 6.2.3.3.1 will be moved to 6.2.2.8 “contents of audit trails” (6.2.8 cannot be introduced as 6.2.4 would be the next open clause). Subsequently, 6.2.3.3.2 will need to be integrated into 6.2.3.3 to avoid a “hanging” subclause. In 6.2.3.3 a note will be added to refer to 6.2.2.8 so that readers can easily find the matching functional requirement.
0023 US		6.2.3.3.1	Guidance	Ed	As written, the text in the guidance is a bit confusing.	Consider the following phrasing: "This could be the source of the modification, or an indication that the modification is the result of an action by dynamic modules of legally relevant software, or of remote verification."	Agreed. The change will be implemented in the new clause 6.2.2.8, see response to 0022 DE
0024 AU		6.2.3.3.2	4 th para.	ed	We understand that the subject of the clause is the entry in the event counter (and audit trail), rather than event counter itself. Could we suggest a minor change to the wording to reflect the entry in the event counter?	Suggest amending the clause as follows: “It shall not be possible to delete an entry in an event counter or audit trail, except as an appropriate response to free up storage capacity to allow for the addition of new entries.”	As the event counter is a single incremental counter (typically an integer), differentiation between the counter itself and an event recorded by the counter is impossible. The current phrasing was agreed upon at the second PG meeting.
0025 AU		6.2.3.3.2	5 th para	te	The only exception listed above is the deletion of an entry to free up storage. The wording in the 5 th paragraph suggests there are more exceptions; via the use of the word “those”. Suggest that the wording is changed to make it explicit that there is only one exception.	Suggest the following wording: Any change to the recorded data in event counter(s) or audit trail(s), except for deletions to free up storage capacity (as specified above) , is a significant software defect and shall be handled accordingly (see detection of significant defects, 6.3.2).	Agreed. This will make the requirement more concise.

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0026 US		6.2.3.3.2	Guidance	Ed	Phrasing is confusing.	Consider the following phrasing: "For specific types of instruments, PGs should define which manual additions to an event recorded in the audit trail are admissible. Further, these additions should only be admissible if they do not affect the remaining contents of the audit trail."	Agreed. The proposed phrasing appears to be much clearer. The change will be implemented in the new combined clause 6.2.3.3.
0027 RU		6.2.3.3.2	p.86	ed	Misspelling of the word "except".	Correct the word "except" in the following paragraph: It is not possible to delete an event counter or an entry in an audit trail, excapt as an appropriate response to free up storage capacity to allow for the addition of new entries.	The spelling will be corrected.
0028 US		6.2.3.3.2	Second paragraph	Ed	The phrase, "including when software is updated," might be inaccurately considered to refer to the time at which a software update is occurring.	Rephrase instead to read, "It shall not be possible to change the data of an event counter or of an entry in an audit trail, <u>even in the event of a software update.</u> "	Agreed. The suggested change will be implemented.
0029 CA		6.2.3.4			Documentation: The documentation shall contain a list of all all legally relevant parameters. There shall be no hidden or undocumented legally relevant parameters. Comment: The word all is repeated	Documentation: The documentation shall contain a list of all legally relevant parameters. There shall be no hidden or undocumented legally relevant parameters. Remove the second all	The duplicate will be deleted.
0030 PL		6.2.3.4	Second paragraph	ed	Word 'all' repeated twice in sentence: <i>Documentation</i> : The documentation shall contain a list of all all legally relevant parameters.	<i>Documentation</i> : The documentation shall contain a list of all legally relevant parameters.	The duplicate will be deleted.
0031 DE		6.2.3.7.4	Hardware interfaces	TE	We would welcome an example to interfaces with direct memory access (DMA). These interfaces can only be protected by hardware means.	Example to be changed: 2) All open interfaces are disabled by the operating system. Example to be added: 3) Open interfaces equipped with direct memory access (DMA) are protected by hardware means.	An additional example would be acceptable since it does not constitute a modification of a technical requirement and the text would be in line with the existing requirement text.

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0032 UK		6.3.10.2.1	Bullet point 3	ed	Add “event counters” to the use of audit trails and store logging data.	Add “event counters” to the use of audit trails and store logging data.	This was discussed during initial drafting of the clause in the previous project. The conclusion was that event counters are not sufficient for the purpose of remote verification
0033 UK		6.3.10.2.1	Bullet point 5	ed	Remove as this has already been covered in the initial sentence.	Remove as this has already been covered in the initial sentence.	The purpose of bullet point 5 is to specify that the instrument shall make certain data available. Since this is only partly covered by the initial sentence, we should amend bullet point 5 as follows: “and makes these data and functionalities available via a communication interface.”
0034 US		6.3.10.2.1	Example in first grey box	Te	Is this term 'rainbow table' sufficiently common knowledge for the PGs or should it be defined in D31? Is it even the right checking mechanism, since the remote verifier might better be able to just perform a parallel checksum calculation?	This could be easily modified by changing the last sentence to read: The verifier checks the outcome of the computation to ensure it matches the expected value.	Agreed, we should use “...checks the outcome of the computation against a reference value.”
0035 US		6.3.10.2.1	Last sentence	Ge	The text reads, “Remote verification functionality shall be sufficiently secured.” The term “sufficiently” is somewhat vague. We would prefer a more specific requirement, particularly if some form of testing mechanism would necessarily correspond to this.	Suggest to remove word “sufficiently”.	Agreed. “Sufficiently” sounds very vague.
0036 UK		6.3.10.2.1	Note	ed	The note and the sentence before it need to be merged as it specifically relates to the sent data and audit trail.	Merge sentences and change to “It shall be possible for the legally relevant software that sends data, including the audit trail to establish and endure the integrity of the instrument to be verified.”	The proposed phrasing would restrict the requirement solely to the software module that sends data. Therefore, the following should be implemented: “It shall be possible to establish and ensure the integrity of the instrument to be verified, including its software module that sends data.”

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0037 UK		6.3.10.2.2	Note	ed	"See 8.3.3.2 for examples of test items for a specific remote verification procedure": however, 8.3.3.2 refers back to 6.3.10.2.2 PGs to decide the test items to be included in 6.3.10.2.2 or, if the PGs decided that the notes in 8.3.3.2.1 are suitable, then move them to 6.3.10.2.2	PGs to decide the test items to be included in 6.3.10.2.2 or, if the PGs decided that the notes in 8.3.3.2.1 are suitable, then move them to 6.3.10.2.2	The reference is intended to address all of 8.3.3.2 (8.3.3.2.1 to 8.3.3.2.5). Without major restructuring of 8.3.3, we can simply change the note in 6.3.10.2.2 to "See <u>subclauses</u> of 8.3.3.2 for examples..."
0038 UK		6.3.10.2.3	Note	ed	Change "The recognition of a verification mark and the data it contains are subject to national legislation" to "The recognition of a verification mark and the data it contains should be subject to national legislation".	Change "are subject to" to "should be subject to".	"Should" would be normative language, which is not allowed in a note, see B 6-2 clause 4.20.1.
0039 IR		6.3.10.3	Note	ed	Missing space: the Note reads "General guidance on interface protection may be found in 6.2.3.7."	Insert a space: "...may be found in 6.2.3.7."	The missing space will be added.
0040 UK		6.3.10.3	Sentence 2	ed	"The connection to the remote verification software shall comply with 6.3.7.": in 6.3.7 there is no reference to interfaces for remote connection requirements. Consider changing to the wording in 6.3.10.2.1 (after the bullet points) or moving this section from 6.3.10.2.1 to 6.3.7.	Consider changing to the wording in 6.3.10.2.1 (after the bullet points) or moving this section from 6.3.10.2.1 to 6.3.7.	The reference is supposed to highlight that transmitted data shall comply with 6.3.7. The wording will be modified accordingly: "The <u>data transmission</u> to the verification software shall comply with 6.3.7."
0041 UK		6.3.10.3	Sentence 5		In "The use of the verification procedure shall not influence the compliance", the reference to "remote" is missing.	Change "The use of the verification procedure shall not influence the compliance" to "The use of the remote verification procedure shall not influence the compliance."	Agreed.
0042 US		6.3.10.3	Third paragraph	Ed	The parenthetical statement doesn't provide any clarity.	Remove the phrase, "(that form part of the measuring instrument subject to verification)"	Agreed. The latter part of the sentence already indicates that the software modules are legally relevant.

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0043 AU		6.3.3.3		ge	What happens if there is a change to data in the error log? Is that a significant defect and should be handled as per 6.3.2?	Suggest including the following paragraph: "Any change to the recorded data in the error log, except for deletions to free up storage capacity (as specified above), is a significant software defect and shall be handled accordingly (see detection of significant defects, 6.3.2)."	At the first PG meeting, it was already agreed that error logs should be dealt with in the same manner as audit trails, see identical wording on protection in 6.2.3.3 (audit trails) and 6.3.3.3 (error logs). During editing, a corresponding statement on changes to recorded data in an error log appears to have been overlooked. This will be corrected. This change should be voted upon in a minor change procedure.
0044 IR		6.3.4	Whole clause	te	The term "learning facility" is used repeatedly as a load-bearing normative concept: it determines what must be documented (6.3.4.1), what is assigned priority among legally relevant software modules (6.3.4.2), and what may be logged in the audit trail as the source of a parameter change instead of triggering reverification (6.3.4.2). However, "learning facility" is never defined in Clause 3; only "dynamic module of legally relevant software" (3.2.16) is defined, and its relationship to "learning facility" is left implicit.	Add a definition of "learning facility" to Clause 3.2 (e.g. "component of a dynamic module of legally relevant software that adapts device-specific parameters over time based on data", or similar wording aligned with 3.2.16), and cross-reference it from the note under 3.2.16.	Agreed.
0045 DE		6.3.4.1	1 st paragraph, last sentence	Ed	Sentence: This information, providing the use of dynamic modules, is regarded as measurement result relevant data. The word 'providing' does not fit here, it should be 'indicating'.	Change sentence to: This information, indicating the use of dynamic modules, is regarded as measurement result relevant data.	OK

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0046 DE		6.3.4.2	2 nd documentati on		<i>The documentation is not written very clearly and the word 'to' does not fit:</i> If dynamic modules of legally relevant software have facilities for continuous learning that allow dynamic parameter changes during use, the documentation shall describe the facilities and their priorities to the whole legally relevant software, especially in reference to the measuring functions.	Rewrite: If dynamic modules of legally relevant software have facilities for continuous learning that allow dynamic parameter changes during use, the documentation shall describe the facilities and their priorities for the whole legally relevant software, especially in reference to the measuring functions. Proposal to rewrite for greater clarity: If dynamic modules of legally relevant software have facilities for continuous learning that allow dynamic parameter changes during use, the documentation shall describe the facilities and how it is implemented that they prioritize the legally relevant software, especially in reference to the measuring functions.	OK. However, it would not be the learning facility that prioritizes the legally relevant software. This would typically be done by another software module, e.g., a task scheduler. Therefore, the following text should be used: "the documentation shall <u>describe</u> the facilities and the levels of prioritiy assigned to all legally relevant software modules, especially in reference to the measuring functions."
0047 JP-02		6.3.4.26.3.8.3.3	Documentati on:	Ed	There is a typo in the Documentation paragraph: "priority" in the phrase "the level of prioritiy assigned" should be corrected to "priority".	Correct the typo "the level of <u>prioritiy</u> assigned" to "the level of <u>priority</u> assigned".	The typo will be corrected.
0048 IR		6.3.4.2, 6.3.8.3.3	Documentati on	ed	The word "priority" is consistently misspelled as "prioritiy" in the documentation requirements on dynamic modules and software separation (6.3.4.2, 6.3.8.3.3), and the error is repeated in the corresponding summary bullets in 7.1.2.	Correct "prioritiy" to "priority" in all occurrences (6.3.4.2, 6.3.8.3.3, and the two related bullets in 7.1.2).	The typo will be corrected.
0049 DE		6.3.5	Compatibilit y of operating systems and hardware	TE	We propose to adopt chapter 6.3.5 to the state of the art in operating system configuration (acc. to extension O of WELMEC 7.2 guide). Anpassung des Kapitels zu den Betriebssystemen an den technischen Stand des WG-7.2	Add content regarding: Prerequisites for the configuration of general-purpose operating systems, Identification of product name and version for Windows operating systems and distribution name and kernel version for UNIX-type operating systems (instead of identifying the configuration only),	Such a change would be out of scope of the ToR and would need to be considered in a next revision, see B6-1 clause 7.5.2.4.

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0050 DE		6.3.5.1	Example		The Roman numerals (I/II) are missing, they should be added. Example: the protective interface may be implemented within the legally relevant application, the operating system, the physical layer, etc.	Change to: Example: (I)/(II) The protective interface...	Thanks, the Roman numerals will be added.
0051 JP-06		6.3.5.1	Example	ed	Missing line break; incorrect capitalization.	Insert a line break after "Example" and change "the protective" to "The protective."	Agreed.
0052 DE		6.3.5.1	General		We would welcome a reference to chapter 6.2.3.7.4 where operating system requirements are met by means on hardware level. Es geht in dem Kapitel nur um konfigurierbare Universal-Betriebssysteme. Das Beispiel bezieht sich nicht auf Absicherungsmaßnahmen zur Hardware.	Add a reference to chapter 6.2.3.7.4: Each of the following operating system requirements shall be met by means on application, operating system, and hardware level (see 6.2.3.4.7) or a combination of them.	At the first PG meeting, it was agreed to remove hardware references from 6.3.5.1 since they are covered by 6.2.3.7.4 now. According to B 6-1 clause 7.5.2.4 b), such a change is not allowed at this stage.
0053 DE		6.3.5.2.1	Examples	Te?	The lists in both examples are not logically coherent. For example, the configuration consists of a legally relevant list of installed packages. Documentation and content of the configuration seem to be mixed here.	1.: write the example as follows: 1) (I)/(II) On a UNIX-type operating system, the configuration consists of legally relevant • kernel modules, • installed packages, • libraries, • accounts and user privileges, • passwords, • configuration files, • file read/write/execute permission settings, • access settings to interfaces. Repeat for the windows example. 2.: Add a documentation requirement: <i>Documentation:</i> The documentation shall contain a list of all installed legally relevant packages, libraries, accounts and user privileges, passwords,	During the previous revision, it was already agreed to use "list of installed packages" instead of "installed packages". Therefore, such a change would be outside the ToR. Since 7.1.2 already asks for a description of the operating system security means, we should duplicate that documentation requirement in 6.3.5.1 and extend it to cover 6.3.5.2, too. A more specific documentation requirement tailored to a specific example would prevent usage of alternative solutions.

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Date:2026-09-03

Document: D 31 2CD

Project: TC5/SC2/p5

Country Code ¹	Part	Clause/ Subclause	Paragraph/ Figure/Table	Type of comment ²	Comments	Proposed change	Convener's responses
						configuration files, file read/write/execute permissions, access to interfaces.	
0054 JP-07		6.3.5.2.1	Examples	ed	The bullet levels of 1) and 2) are inconsistent and should be at the same bullet level.	Align the bullet level of 1) and 2).	OK. The formatting will be corrected.
0055 DE		6.3.5.3	Functional Requirements	TE	We would recommend a general introduction to what operating systems on a measuring instrument are used to. Das Kapitel beschreibt, wozu Universal-Betriebssysteme auf Messgeräten dienen.	Add the following note under 6.3.5.1: Operating system functions can support the legally relevant task or can influence it. Generally, a general-purpose operating system delivers a complex application programming interface (API) for the legally relevant application, - to deliver access to specialized hardware (e.g. sensors), - to start modules in a predefined order and environment, - to provide managed memory and persistent storage, - to provide a time base and task scheduling, - to grant access to users and secure administration tasks.	Agreed. The note appears to be in line with the intentions of 6.3.5.3. This change should be voted upon in a minor change procedure.
0056 DE		6.3.5.3.1	Configuration and administration settings	TE	We would prefer to move this chapter to 6.3.5.3.4, because this chapter summarizes all configurations made in the previous chapters.	Move to chapter 6.3.5.3.4	The structure was already agreed upon and should not be changed again.
0057 DE		6.3.5.3.1	Configuration and administration settings	ED	We would recommend renaming administration settings to administrative settings in headline and administration task in administrative tasks in the body text.	Rename administration settings in administrative settings in headline and administration task in administrative tasks in body text.	“administrative tasks” appears to be the more common term. The change will be implemented.
0058 DE		6.3.5.3.1	Configuration and administration settings	TE	We recommend a preferred example to check the administrative settings on a measuring instrument against designated values in the software test report. Das bevorzugte Beispiel zum Abgleich der Einstellungen am Betriebssystem auf einem Seriengerät mit den Vorgaben (Sollwerten) des Baumusters im Zertifikat.	Add the following example: I) The checksum over the operating system parts identified in the above example (6.3.5.2.1) is computed by the legally relevant software at startup and compared against the designated values in the software test report.	Since this instrument cannot perform a check against the certificate, the suggested modification would introduce new problems. Also, such a technical change would need to be discussed within the frame of a new revision.

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0059 DE		6.3.5.3.1	Configuratio n and administrati on settings	TE	The example should be enhanced with exceptions for temporary files and folders, accessible from outside via open hardware interfaces. Das Beispiel (I) sollte um Ausnahmen zu temporären Dateien und von außen erreichbaren Verzeichnissen ergänzt werden.	Add the following example All legally relevant files are write-protected, except temporary files that change on run-time, used by the application or the operating system. Folders, accessible by extern interfaces, are not writable and executable at the same time.	Agreed. We appear to have overlooked temporary files when drafting the text.
0060 UK		6.3.5.3.1	Note	ed	This implies that legally relevant operating system parts can only be changed by means of a verified update (see 6.3.9.3),	Change “can” to “should”.	This change would modify the meaning of the note. At the moment, it expresses a technical necessity. “Should” would be normative language which should not be included in a note.
0061 DE		6.3.5.3.3	Boot process	TE	We would prefer to move this chapter to the beginning to equalize it with the system startup procedure.	Move to chapter 6.3.5.3.1	The structure was already agreed upon and should not be changed again.
0062 UK		6.3.5.3.3	P3	ed	May be interrupted, as long as its integrity is preserved.	Change to “may be interrupted but the integrity should be preserved”.	OK, but we should use “shall” as this is a requirement.
0063 AT		6.3.5.3.4	2) (I)	ed	Change wording for clarification Current text: Firewall settings limit open network ports of the operating system to only allow communication with the legally relevant software through a limited list of protocols.	Firewall settings should limit open network ports of the operating system to those required by the legally relevant software, allowing communication only through approved protocols and ports. Ports not required by the legally relevant software should be closed	The proposed change would introduced normative language in an example which is not allowed according to B6-2.
0064 DE		6.3.5.3.5	Example 2		Original: The minimum number of operating system parts is utilized to ensure the measurement process can be executed. At the moment, this example does not state what we want it to.	Rewrite: The minimum number of operating system parts necessary to execute the measurement process is used.	OK, the rewritten form seems to be clearer.

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0065 DE		6.3.5.4.1(6.3.5.2.1)	Example	TE	The examples under 6.3.5.2.1 are pretty generic, we would welcome more details.	Examples: The configuration is identified by means of a checksum over the following operating system parts and their corresponding folders or registry keys (if available). 1/UNIX-type operating system: Kernel (/boot/) and kernel modules (/lib/modules/), Libraries (/lib/ and /usr/lib/), Applications (/bin/, /sbin/, /usr/bin/, /usr/sbin/, /usr/local/bin/), Services (/etc/init.d/, /etc/systemd/, /usr/lib/systemd/), User accounts (/etc/passwd/, /etc/shadow/, /etc/group), Network (/etc/iptables/, /etc/ufw/, /etc/network/, /etc/ssh/), USB (/usr/lib/udev/, /etc/udev/). 2/ Windows-type operating system: Kernel (C:\Windows\System32\), Driver (C:\Windows\System32\drivers\) Applications (C:\Program Files\, C:\Program Files (x86)\) User accounts (C:\Windows\System32\GroupPolicy\) Services (HKLM\SYSTEM\CurrentControlSet\Services) Network (HKLM\SYSTEM\CurrentControlSet\Services\Shared Access\) USB (HKLM\SYSTEM\CurrentControlSet\Enum\USB)	OK. The additions to the example can be implemented, but they should be kept to pure additions. This change should be voted upon in a minor change procedure.
0066 UK		6.3.6.2.3	Guidance	ed	PGs may define alternative conditions for data deletion.	Change “may” to “should”.	Since D31 already lists some conditions for data deletions and it is the PGs choice to add some more, this should remain a “may” option.
0067 DE		6.3.6.36.3.7.3	Example 1 Example 2		Penultimate sentence: If both values match, the dataset is not falsified.	If both values match, the dataset has not been manipulated.	Agreed. The proposed text is clearer.

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					This could be written less awkward, even if we cannot use 'verified'.		
0068 DE		6.3.6.3	Securing and protection	TE	We would welcome a note to highlight the operating system means for storing sensitive cryptographic information.	Add the following note: Operating system means are used to protect sensitive cryptographic information against inadmissibly retrieval.	To make this a purely editorial note rather than a statement of fact, we should use "... means can be used to protect..."
0069 JP-08		6.3.7.3	After Note	ed	An unnecessary gray-shaded text box with no content remains below the Note and should be removed.	Remove the empty gray-shaded text box below the note.	Agreed. This will be deleted.
0070 US		6.3.7.3	Example (3)	Ed	To add clarity to the second sentence, it could be modified.	Proposal: <u>This digital signature</u> is appended to the transmitted dataset.	OK
0071 UK		6.3.7.3	Guidance	ed	PGs may require a raised risk level when considering a publicly accessible open network.	Change "may" to "should".	This proposal was already discussed and rephrased at the second PG meeting.
0072 UK		6.3.8.1	Guidance	ed	Change "may" to "should".	Change "may" to "should".	This should remain an option, since the decision of making a certain property of the instrument legally relevant usually resides with the type approval authority.
0073 DE		6.3.8.2.2.	Guidance	ed	The note is phrased as an opt-out solution while printing of IDs is not mentioned anywhere else. This has already caused some confusion during adaptation in R76.	Minimally amend the Guidance as follows: PGs should decide if it is required to identify components on a printout. This may not be necessary in cases where the product bears a label or the measurment is repeatable.	Agreed, we should follow the wishes of TC9/SC1/p1 here. This change should be voted upon in a minor change procedure.
0074 US		6.3.8.2.3	Example (2)	Ed/Te	The example refers to the possible exchange of a cable. "Exchange" could, however, also be benign. In order to convey the possibility of bad actors breaking a seal, the term "tampering" could be used rather than "exchange". Alternatively, add the modifier "unauthorized" prior to the word "exchange".	Proposal: "Both components are placed together in the same housing and the communication cable is protected by a hardware sealed within the housing to prevent <u>tampering</u> ."	Agreed.
0075 UK		6.3.8.2.3	Guidance	ed	Change "PGs may decide to exempt some components from this requirement" to "PGs should provide a list of components that are exempt from this requirement".	Change "PGs may decide to exempt some components from this requirement" to "PGs should provide a list of components that are exempt from this requirement".	Using "should" here would indicate that D31 encourages the usage of the exeption which was not the intention of the PG.

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0076 UK		6.3.8.2.3	Guidance 2 after second examples given	ed	Delete as a repeat of the above.	Delete as a repeat of the above.	The note is not a repetition but only relevant to the requirement stated immediately before. The notes will be clarified.
0077 UK		6.3.8.2.3	Guidance after third example given	ed	Delete as a repeat of the above.	Delete as a repeat of the above.	The note is no a repetition but only relevant to the requirement stated immediately before. The note will be amended to reflect this.
0078 DE		6.3.8.2.3	Text under 2 nd grey box		Legally relevant components shall check the authenticity, integrity and/or availability of another software-controlled component. Right now, this sentence reads like this: Several LR components shall check the authenticity etc. of one other random component. Also, it is not clear whether LR components or LNR components are meant.	Legally relevant components shall check the authenticity, integrity and/or availability of other legally relevant components.	Agreed, the rephrased version appears to be much clearer.
0079 UK		6.3.8.3.1	Last note	ed	Change “6.3.4.2 need to be observed” to “6.3.4.2 should be observed”.	Change “6.3.4.2 need to be observed” to “6.3.4.2 should be observed”.	Since this is a note, we cannot use normative language.
0080 US		6.3.8.3.3	Documentati on	Ed	Correct the spelling of “priority”	The documentation shall contain a description of the levels of ~~priority~~ <u>priority</u> assigned to all legally relevant software modules and all legally non-relevant software modules.	OK, the type will be corrected.
0081 US		6.3.8.3.3	Example (1) in the third grey block	Ed	Correct subject/verb agreement	~~A~~ Priority levels ~~is~~ <u>are</u> assigned to the legally relevant functions, which ~~is~~ <u>are</u> higher than for normal legally non-relevant processes and which cannot be decreased by a user/operator of the measuring instrument.	OK, thank you.
0082 PL		6.3.8.3.3	Last paragraph	ed	Word ‘all’ repeated twice in sentence: Furthermore, it shall contain a list of all all legally relevant software modules and the protective interface.	Furthermore, it shall contain a list of all legally relevant software modules and the protective interface.	The duplicate will be deleted.

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0083 DE		6.3.8.3.3	Note	Ed	Note: This does not preclude legally relevant software modules from showing measurement process data. 'presenting' would fit better here, since this word is used in the sentence before.	Change 'showing' to 'presenting'.	The suggested change was already part of 2CD.
0084 RU		6.3.8.3.3	p. 47	ed	1. Misspelling of the word "priority. Repetition of word "all".	Corrections must be made in the following paragraph: <i>Documentation:</i> The documentation shall contain a description of the levels of priority assigned to all legally relevant software modules and all legally non-relevant software modules. Furthermore, it shall contain a list of all all legally relevant software modules and the protective interface. All legally relevant functions and data domains of the software shall be described to enable a type evaluation authority to decide if software separation has been implemented correctly.	Both corrections will be implemented.
0085 DE		6.3.8.3.3	Securing and protection	TE	The chapter is also applicable for operating systems.	Add the following note: Legally relevant software modules are prevented from inadmissibly influence of legally non-relevant software modules by means of the operating system.	This is already addressed in second the example block of the clause. Therefore, no change is needed.
0086 UK		6.3.9.2		ed	Removed inadmissibly.	Removed inadmissibly.	The requirement has been part of D31 for three revisions now and we do not have sufficient grounds for changing it at this stage.
0087 UK		6.3.9.3		ed	This section may benefit from references to section 8.	Add references from 8.2 onwards.	Agreed, such references will be added.

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0088 AU		6.3.9.3.2	Note	ge	The note uses 'should' (not 'shall') in relation to verification after the verified update. I note this comment has been raised and rejected previously (AU-15 on 1CD) on the basis that D 31 cannot impose requirements on national legislation regarding verification. But OIML D 31 simply cannot impose requirements because it is a guidance document (note there are nearly 300 other instances of 'shall' in the document). Further this makes D 31 internally inconsistent because the definition of 'verified update' is 'procedure...after which the subsequent verification is necessary'.	Replace 'should' with 'shall', so the note ends with '...and the measuring instrument shall be verified'. Alternatively, the Note should be made part of the clause and the wording amended as follows: "After the update of the legally relevant software of a measuring instrument (exchange with another approved software version or re-installation), the securing and protection means shall be renewed and the measuring instrument shall be verified."	This comment was discussed and rejected within the frame of the previous revision. Therefore, we cannot open up the issue again after 2CD, see B6-1 clause 7.5.2.4.
0089 CA		6.3.9.4.2		ed	6.3.9.4.2 Functional requirement - automatic update procedure After initiation of the update procedure, a traced update of software shall run automatically. Note 1: As shown in Figure 1, the procedure of a traced update comprises several steps: loading, integrity checking, checking of the origin (authentication) , installation, logging and activation. Comment: Authentication is the defined term and checking of origin is the explanation.	6.3.9.4.2 Functional requirement - automatic update procedure After initiation of the update procedure, a traced update of software shall run automatically. Note 1: As shown in Figure 1, the procedure of a traced update comprises several steps: loading, integrity checking, authentication (checking the origin) , installation, logging and activation. Terms should be reversed in sentence	Agreed.
0090 UK		6.3.9.4.2	Note 1	ed	Remove the word "note 1" and move the correspondent wording below "Guidance".	Change to "The procedure of traced updates should comprise of several steps including loading, integrity checking, checking of the origin (authentication), installation, logging and activation (refer to Figure 1)"	Note 1 is currently an explanation of the procedure rather than a requirement. "Should" would imply the possibility for deviating from the procedure, which would be another method altogether.
0091 UK		6.3.9.4.2	Notes 2 and 3	ed	Change the "may"(s) to "should".	Change the "may"(s) to "should".	"Should" does not fit here, as there are several options to choose from and only one of them can be selected.
0092 UK		6.3.9.4.5	Note 3 after figure 1	ed	Change "does not require" to "should not require".	Change "does not require" to "should not require".	The note is an explanation rather than a requirement and should stay that way.

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0093 UK		6.3.9.4.5	Notes	ed	Notes not numbers sequentially (Note 1, 2, then 1, 2, and 3 again).	To number notes sequentially from 1 to 5.	Agreed, the numbering will be corrected.
0094 DE		7.1.2		ed	list of commands of each hardware interface of the measuring instrument or component	This bullet point is not mentioned anywhere in the Document.	The documentation requirement is given in 6.2.3.1. A reference will be added.
0095 US		7.1.2	4 th bullet on p. 66	Ed	Suggest rephrasing.	“Complete list of components that form the legally relevant hardware.”	OK
0096 US		7.1.2	5 th bullet on p. 66, 1 st sub-bullet	Ed	Correct spelling of “priority”		OK
0097 US		7.1.2	6 th bullet	Ed	The sub-bullets in this section could be reordered in decreasing importance.	Start with the last sub-bullet, and end with what is currently the first sub-bullet.	OK
0098 US		7.1.2	6 th bullet	Ed	Correct spelling of “priority” in the first sub-bullet.		OK
0099 US		7.1.2	6 th bullet	Ed	The importance of “if software separation is implemented” suggests this should be higher in the bullet listing.	The entire block could be moved before before remote verification and dynamic module sections since it is likely the most commonly implemented of the three.	OK
0100 US		7.1.2	7 th bullet	Ed	The operating manual is perhaps the most elemental requirement. Should it be first in the list?	Consider moving to the first item in this list.	OK
0101 JP-03		7.1.2	The third-from-last and second-from-last bullet points	Ed	The word "priority" appears twice in this section, and both occurrences of the phrase "levels of priority assigned" should be corrected to "levels of priority assigned".	Correct "priority" to "priority" in the first sub-bullet under both the third-to-last and second-to-last bullet points.	OK
0102 UK		7.2.1		ed	Some bullet points do not include a reference to a clause, for instance “description of the user interface, menus and dialogs” which should refer to 6.2.3.1.	Add a reference to the corresponding clauses when missing/applicable.	Agreed.
0103 JP-09		7.2.2		ed	Hyphens may be more appropriate than bullet points in this context.	Where applicable, please use hyphens instead of minus signs.	OK

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0104 UK		7.2.2	Bullet point 4	ed	"Software modules under legal control, including whether or not the instrument is equipped with a remote verification procedure or a traced update procedure": there is no reference to a clause, unlike for the other bullet points.	Add a reference to the corresponding clauses.	OK. Under 6.3.9.4 equivalent information to be included in the certificate will be added. This change should be voted upon in a minor change procedure.
0105 UK		7.2.2	Last bullet point	ed	"Test items with their unique identification used for the remote verification procedure, see 6.3.10.2.2": there is no Certificate guidance in this clause, unlike for the other references in 7.2.2.	Add the Certificate guidance in clause 6.3.10.2.2.	The reference is simply meant as a pointer to the location of potential test items.
0106 JP--10		8.1	Guidance	ed	There is a typo and "shshould" should be corrected.	Correct "shshould" to "should".	OK
0107 US		Annex B	1 st entry on p. 104	Ed	Check spelling of "either".		OK
0108 US		Annex B	Entry for 6.3.10.2.1 on p. 105	Te	Relates to previous comment of same section. We would prefer a more specific requirement.		OK, see response to 0035 US.
0109 UK		Annex D	06.3.7.3	ed	The text in the table for clause 6.3.7.3 is "PGs shall decide what response is required, e.g., the measurement data shall be discarded or marked unusable". Clause 6.3.7.3 uses "should".	Change "shall" to "should".	OK, the error will be corrected.
0110 IR		Annex D	PG actions and decisions table, row for 7.4	ed	The Annex D summary for clause 7.4 does not match the (correct) Guidance text in the main body. It reads: "PGs should justify the selection of level B shall be justified by PGs [ME349.1]together with evidence of mitigated risk", which duplicates the phrase "shall be justified by PGs", contains a leftover reviewer/edit marker "[ME349.1]", and is missing a space before "together". The clean version of clause 7.4 itself reads correctly: "PGs should justify the selection of level B together with evidence of mitigated risk."	Replace the Annex D entry for 7.4 with the same wording as the main clause: "PGs should justify the selection of level B together with evidence of mitigated risk.", removing the duplicated phrase and the stray "[ME349.1]" marker.	Agreed, see also response to 0109 UK

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0111 US		Annex D	Table entry for 6.2.3.3.1 on p. 111	Te	Include verified update or remote verification among the factors in the decision.	This could be the source of the modification, the details of a verified update, remote verification, or the information that the modification is the result of an action of dynamic modules of legally relevant software or remote verification.	Agreed. The change will be implemented in the new clause 6.2.2.8.
0112 US		Annex D	Table entry for 7.4 on p. 114	Ed	Insert "T" to start first sentence.		OK. The text will be amended as suggested by 0110 IR.
0113 CA	1	6.2.2.2	Par 2	ed	Documentation: The documentation shall contain a list of all all legally relevant functions and a description of how to access them. Comment: The word all is repeated	Documentation: The documentation shall contain a list of all all legally relevant functions and a description of how to access them. Remove the second all	The duplicate will be deleted.

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