

## Template for comments and convener's observations

Date:2023-04-20

Document: BIML\_SC3\_P3\_N004

Project: BIML/SC 3/p 3

Country Code <sup>1</sup>	Part	Clause/ Subclause	Paragraph/ Figure/Table	Type of comment <sup>2</sup>	Comments	Proposed change	Convener's responses
0001 DE	1			Ed	The formatting of the clause titles is not uniform, sometimes the title is in normal font (e.g., 4.1) other times it is bold (e.g., 6.9.1). Making only titles in the third layer bold appears to be an odd formatting choice.	Make all titles up to a certain depth bold, e.g., all titles up to the third layer are formatted in bold font.	Agreed. The formatting of the titles will be made uniform.
0002 PL	1	Even-numbered page headers (the entire text of 1 CD revision of OIML B 6-1)		ge	Incorrect form of numbering the OIML publication: OIML B 6-1:2019 (E).	Correct form of numbering should be as follow: OIML B 6-1:202x (E).	Agreed.
0003 PL	1	1	1.1 and 1.2	ge	According to the rules described in 6.4.5 of 1CD revision of OIML B-1_2019-clean 20221202 references to other publications of OIML shall be indicated by reference numbers and publication dates. Therefore, the reference to OIML B 6-1 in 1.1. and 1.2 are given incorrectly.	Correctly it should be: OIML B 6-1:202x.	Partially agreed. The reference will be changed to "this publication".
0004 DE	1	1.1		Ed	Is the term "technical publications" defined somewhere?	If not, either supply a definition or add a reference to clause 4.	Agreed.
0005 US-03	1	1.1		Gen/ed	Since the other clauses in the scope have specifically mentioned Basic Publications (B-documents), Vocabularies (V), Guides (G), Expert Reports (E), and etc. ... it seems that it might be helpful to users of B-6 that Recommendations (R) and Documents (D) are specifically mentioned in 1.1	1.1 Part 1 of these Directives (OIML B 6-1) describes the responsibilities of the various bodies in OIML technical work and the procedures that they shall apply in the development of OIML technical publications, <b>which include OIML International Recommendations (R) and International Documents (D).</b>	Agreed.
0006 US-04	1	1.4		Gen/ed	As this is an element of the scope, the primary purpose of this clause seems to be exclusion of these other publication types, rather than to state their existence and their exclusion as a secondary point. Grammatical redundancy "In addition, the OIML also publishes..."	<u>Suggested edit:</u>  1.4 The OIML Bulletin and other information-type leaflets are published by the OIML, but are not covered by these Directives."	Agreed.
0007 PL	1	2.2	2.2.1	te	1CD version OIML B 6-1:2019 does not contain a clause or subclause 0, so it is not clear what description in 0 the last sentence of 2.2.1 refers to.	It is proposed to check the correctness of the reference to clause 0.	Agreed. The correct reference will be included.
0008 DE	1	2.2.1		Ed	Reference to "0".	Please check all references for validity.	See response to 0007.

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0009 US-05	1	2.2.1		ed	Missing/broken link.	Possibly supposed to be referencing sections 5.11 and 6.2.	See response to 0007.
0010 US-06	1	2.2.2		ed	Suggested edits.	A TC or SC may be responsible for one or more OIML publications, each of which is developed/ <b>revised</b> by an individual Project Group (PG) within the TC or SC. TCs and SCs are permanent structures whereas a PG is temporary and only exists for the duration of the project to <b>develop, revise, or update</b> an OIML publication. The role and composition of a PG are described in 5.12 and 6.5 respectively.	Agreed.
0011 PL	1	4.1	4.1.3	ge	According to the rules described in 6.4.5 of 1CD revision of OIML B-1_2019-clean 20221202 references to other publications of OIML shall be indicated by reference numbers and publication dates. Therefore, the reference to OIML V 2-200 in 4.1.3 is given incorrectly.	The reference to OIML V 2-200 should be given as following: OIML V 2-200:2012 <i>International vocabulary of metrology – basic and general concepts and associated terms (VIM)</i> (see references to OIML publications in 2.4 of 1CD revision of OIML B 6-2_2019-clean 20221202).	Agreed.
0012 DE	1	4.1.2		Ed	One would expect B6-1 and B6-2 to follow the formatting guidelines from B6-2.	Reformat the given example according to clause 4.20 from B6-2.	See response to 0011.
0013 PL	1	4.2		ed / ge	The word "see" in parentheses incorrectly begins with a capital letter "S". According to the rules described in 6.4.5 of 1CD revision of OIML B-1_2019-clean 20221202 references to other publications of OIML shall be indicated by reference numbers and publication dates. Therefore, the reference to OIML B 1 in 4.2 is given incorrectly.	Correctly it should be: (see OIML B 1:1968 <i>OIML Convention</i> , Article VIII) - (see references to OIML publications in 2.4 of 1CD revision of OIML B 6-2_2019-clean 20221202).	Agreed.
0014 DE	1	4.2 – 4.7		Ed	The first sentence of each clause is missing a verb and a subject.	For 4.2: Add the following at the beginning of the sentence to "An International Recommendation is..." Similarly modify 4.3 – 4.7.	Agreed.
0015 PL	1	4.3		ge	According to the rules described in 6.4.5 of 1CD revision of OIML B-1_2019-clean 20221202 references to other publications of OIML shall be indicated by reference numbers and publication dates. Therefore, the reference to OIML D 11 in 4.3 is given incorrectly.	The reference to OIML D 11 should be given as following: OIML D 11:2013 <i>General requirements for measuring instruments – Environment conditions</i> (see references to OIML publications in 2.4 of 1CD revision of OIML B 6-2_2019-clean 20221202).	Agreed.

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0016 US-07	1	4.3		gen	<p>"International Document(D) = Intended to facilitate the implementation or development of a Recommendation."</p> <p>We do not believe that this statement adequately defines/summarizes all of the important scopes/functions of the long list of currently-published OIML D-documents.</p> <p>Both D11 and D31 would provide D-document examples that would fit the definition quite well.</p> <p>It could be argued that OIML D1 "<i>National metrology systems – Developing the institutional and legislative framework</i>" would not fit this definition at all.</p>	<p>Improve/expand the definition.</p> <p>Possible discussion point for the PG.</p>	<p>Agreed. The definition has been expanded to cover the scopes/functions of the current Documents. Improvements to the categorisation of OIML publications will be considered during Stage 2 of the project.</p>
0017 US-08	1	5.2		ed	Suggested edit.	"The International Conference on Legal Metrology (" <b>The</b> Conference") is the ..."	Agreed.
0018 PL	1	5.2	b)	ge	According to the rules described in 6.4.5 of 1CD revision of OIML B-1_2019-clean 20221202 references to other publications of OIML shall be indicated by reference numbers and publication dates. Therefore, the reference to OIML B 1 in 5.2 b) is given incorrectly.	Correctly it should be: OIML B 1:1968 <i>OIML Convention</i> , Article I (7) (see references to OIML publications in 2.4 of 1CD revision of OIML B 6-2_2019-clean 20221202).	Agreed.
0019 PL	1	5.3	i)	ge	According to the rules described in 6.4.5 of 1CD revision of OIML B-1_2019-clean 20221202 references to other publications of OIML shall be indicated by reference numbers and publication dates. Therefore, the reference to OIML B 6-2 in 5.3 i) is given incorrectly.	Correctly it should be: OIML B 6-2:20xx <i>Directive for OIML technical work - Part 2: Guide to the drafting and presentation of OIML publications</i> (see references to OIML publications in 2.4 of 1CD revision of OIML B 6-2_2019-clean 20221202).	Agreed.
0020 US-09	1	5.3j		ed	Suggested edit.	( <b>OIML B6-1</b> (this publication) and OIML B 6-2),	Not agreed. It is clear that this publication relates to B 6-1.
0021 PL	1	5.5		ge	According to the rules described in 6.4.5 of 1CD revision of OIML B-1_2019-clean 20221202 references to other publications of OIML shall be indicated by reference numbers and publication dates. Therefore, the reference to OIML B 16 in 5.5 is given incorrectly.	Correctly it should be: OIML B 16:2011 <i>Terms of reference for the Presidential Council</i> . (see references to OIML publications in 2.4 of 1CD revision of OIML B 6-2_2019-clean 20221202).	Agreed.

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0022 PL	1	5.10	d ) and g)	te	1CD version OIML B 6-1:2019 does not contain a clause or subclause 0, so the references (see 0) is not clear.	It is proposed to check the correctness of the reference to clause 0.	Agreed. The correct reference will be included.
0023 DE	1	5.10	list item d), g)	Ed	Reference to "0".	Please check all references for validity.	See response to 0022.
0024 US-10	1	5.10d		ed	Missing/broken link.		See response to 0022.
0025 US-11	1	5.10g		ed	Missing/broken link.		Agreed. The correct reference will be included.
0026 NL	1	5.11		ge	"(...) by the TC or SC <b>secretary who is appointed by the TC or SC secretariat</b> "-> this looks inconsistent with par 6.1.3 under a ('proposing') but... consistent with 6.2.1. So is it appointed or proposed? Who decides?	These responsibilities are mostly undertaken by the TC or SC secretary who is <b>proposed</b> by the TC or SC secretariat (see 6.8.3).	Agreed. "appointed" changed to "designated".
0027 US-12	1	5.12	1	gen	5.12 states: "Countries and economies participating in a TC or SC will automatically participate in a PG under the respective TC or SC."  We support this procedure.  However, it seems that there have been a few instances recently where P-members of a TC/SC were <u>not</u> "automatically" made P-members of a new PG ... forcing member states to go on to the website to upgrade their PG status to P-member.  (this seems to also be related to the procedures of 6.1.7, 6.4.4 and 6.4.5)	<b>Possible PG discussion topic.</b>	Not agreed. P-members of the respective TC/Sc should not automatically P-members of a PG under that TC/SC.
0028 PL	1	5.12	h)	te	1CD version OIML B 6-1:2019 does not contain a clause or subclause 0, so it is not clear what means "in accordance with 0".	It is proposed to check the correctness of the reference to clause 0.	Agreed. The correct reference will be included.
0029 US-13	1	5.12h		ed	Broken/missing link		See response to 0028.
0030 NL	1	5.13		ge	For a revision a 3 yr period is reserved: is this realistic? My colleagues indicate that 3 yr is too tight	5 yr	There is no clause 5.13.
0031 SA	1	6.1.3		ge	Providing clarification for ambiguous details when required	Add new item	<b>Not agreed.</b>

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0032 US-14	1	6.1.3a		gen	In general, we support the paragraph that has been added as "Footnote #2" concerning Co-secretariats and Co-secretaries.  However, this seems to be an important-enough (and frequent-enough) occurrence that we believe that it should be part of the main body of B6-1 ... and not just added as a footnote.  (see also US comment on 6.3.1)	Consider moving footnote #2 into the main body of text.	Agreed. Moved to 5.11.
0033 US-15	1	6.1.8		ed	In 6.1, the TC/SC is still being "established."  ... suggested edit on 6.1.8 ...  (See also US- xx comment )	There shall be at least six OIML Member States from two different regions <b>that agree to</b> <del>who</del> participate <b>on the TC or SC</b> as P-members.	Agreed.
0034 US-16	1	6.2.1a		gen	Suggest to add the concept of Co-Secretariat and Co-Secretary to 6.2.1a.  (see also US comment on 6.1.3a, above)		Agreed in principle, but if explanatory text regarding co-secretariat and co-secretary is already elsewhere in the main body of the text then it would be superfluous to repeat the concept here.
0035 DE	1	6.2.2		Te	The new clause 6.2.2 may pose problems if an SC member state leads a PG within the SC and then changes its status to O-member. Is this intended? Also, it is unclear if switching to O-member status also affects PGs under an SC.	Either specifically address the issue in 6.2.2 or in 6.4.	Agreed.
0036 US-17	1	6.3		ed	Suggested edit to title of 6.3.  6.3.1 to 6.3.4 are about the proposal for a project ... the actual approval of the project does not occur until 6.3.5.	6.3 Project Proposal and Approval	Agreed.

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0037 US-18	1	6.3		gen	Perhaps there should be something in 6.3 (Project proposal) that requires the project proposer to list up-front the 6 (or more) OIML member states that have already agreed to become P-members on the proposed project. This would save time and embarrassment if it turns out that this requirement (found in 6.4.7) is unable to be met at a later date.  (see also US-22 comment on 6.4.7)		Agreed.
0038 US-19	1	6.3.1			In general, we support the paragraph that has been added as "Footnote #3" concerning Co-covenerships and Co-conveners..  However, this seems to be an important-enough (and frequent-enough) occurrence that we believe that it should be part of the main body of B6-1 ... and not just added as a footnote.  (see also US comments on 6.1.3a and 6.5.1a)	Consider moving footnote #3 into the main body of text.	Agreed. Moved to 5.12.
0039 US-20	1	6.3.4		gen	"The secretariat of the TC or SC shall confirm whether the TC or SC <del>wishes to become the PG convener for the project's PG ...</del> "  Historically, the TC/SC Secretariat generally had the "right-of-first-refusal" to become the PG convener of a project that would fall in their TC/SC.  The edit made to 6.3.4 would change that precedent ... and should probably be discussed by the B6 PG.	Return text in 6.3.4 to the text in the existing B6:  "The BIML shall discuss the proposal and the ToR with the secretary of the TC or SC within whose scope the proposed project falls. The secretary of the TC or SC shall confirm whether the TC or SC wishes to become the PG convener for the project's PG and whether it is able to comply with the time frames indicated in 6.12."  Suggest this should be discussed by the B6 project group.	Not agreed. The project proposer will identify the PG convener, although I would anticipate that the proposer will have discussed/considered this with the secretary of the respective TC/SC beforehand.

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0040 US-21	1	6.4.46.4.5		gen	<p>"All members of the respective TC or SC shall initially be given O-member status in the PG ..."</p> <p>Disagree with this.</p> <p>Members of the TC/SC should initially be given the same membership status in the PG that they have in the TC/SC. Then, they can opt to change their status at any time in the future.</p> <p>(Also, if <u>everyone</u> is made an O-member ... then at least for a period of time there would not be the required 6 P-members on the PG) (6.4.7)</p>	All members of the respective TC or SC shall initially be given <b>the same</b> membership status in the PG that they have in the TC or SC.	Not agreed. However, if the project proposal contains the list of countries that will be P-members then those countries will be given the status of P-member when the PG is formed.
0041 US-22	1	6.4.7		Gen	<p><u>From 6.4.7:</u></p> <p>"There shall be at least six OIML Member States from two different regions who want their countries to be registered as P-members on this PG."</p> <p>Support this requirement.</p> <p>Perhaps there should be something back in 6.3 (Project proposal) that requires the project proposer to list up-front the 6 (or more) OIML member states that have already agreed to become P-members on the proposed project.</p> <p>(see also US-18 comment on 6.3)</p>	Possible item for discussion.	Agreed.
0042 DE	1	6.5.1 b)6.7.1		Ed	<p>Clause 6.7.1 seems to be a repetition of 6.5.1 b).</p>	Replace the obligations given in 6.5.1 b) with a reference to 6.7.1 to avoid conflicts between both clauses. For example, 6.7.1 currently lists possible penalties while 6.5.1 b) does not.	Agreed.

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0043 US-23	1	6.5.1a		gen	Suggest to add the concept/possibility of Co-Conveners to 6.5.1a.  (see also US comment on 6.3.1, above)		Agreed in principle, but if explanatory text regarding co-convenership and co-convener is already elsewhere in the main body of the text then it would be superfluous to repeat the concept here.
0044 US-24	1	6.8.2		gen	<u>6.8.2 says:</u> “The secretariat or PG convenership may be re-approved for further periods of three years. For each three-year period, the BIML shall use the online TC, SC, or PG work area, as appropriate, to organise a vote amongst the TC’s, SC’s, or PG’s P-members on the re-approval of the secretariat or PG convenership. The results of this vote shall be published on the respective work area.”  This is existing text in B6 ... but does <u>not</u> reflect existing practice by the BIML. In fact, not sure this has <u>ever</u> been done for <u>any</u> TC/SC/PG. If the 1CD of B6 is supposed to reflect current practice, then this is a clause that should be softened (or possibly removed).  An argument to keep the clause (in a softened form rather than removing it) is that it provides a bit of a “fail-safe” mechanism/procedure for an instance when a convenership really <i>needs</i> to be changed.	Since this is not current practice, suggest softening the “this shall be done” language in 6.8.2.  Suggest as a discussion point for the PG.	Not agreed. The process of re-approving secretariats and conveners has commenced.
0045 US-25	1	6.11.2		gen	6.11.2 says:  “... with a minimum of xx % of the P-members required to cast a vote.”  Disagree with adding this requirement, as it just adds an extra burden to reach agreement ... and it is often hard enough to get responses from PG members.	Remove this additional requirement.	Not agreed as this does relate to voting on a CD – see reference to 6.11.2 from 7.5.1.3.

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					<p>This is adequate: Decisions shall be valid when two-thirds of the votes cast by the P-members of a TC, SC or PG are in favour ... where abstentions and failures to reply are not considered as votes cast ...</p> <p>Example: 20 P-members on a PG. 8 responses are received on a “decision”, all in favour. Zero negative responses. (in this example, with the proposed additional requirement ... this decision would fail).</p> <p>It should additionally be noted that 6.11.2 is only about “decisions” (such as a new proposal from a PG member or resolving a point of disagreement within the PG) ... this is <u>not</u> about voting on a CD.</p>		
0046 DE	1	6.11.2.1		Ge	We strongly support the inclusion of a minimum percentage of P-members who need to cast their votes. 50% seems a little low but should work in most cases.		Agreed.
0047 NL	1	6.11.2.1		ge	50% looks fair		Agreed.
0048 DE	1	6.12	list item d)	Te	To our knowledge, the eight months allowed between successive CDs are very frequently exceeded despite PG conveners' efforts.	Increase the allowed interval to one year to make penalties resulting from 6.15.	Not agreed. There is a desire for timescales to be adhered to in order to ensure OIML publications are developed/revised in a timely manner. However, the proposal can be taken into consideration as part of stage 2 of the project.
0049 US-26	1	6.12a		gen	6.12a says: Unless otherwise indicated in their ToR, PGs should try to keep to the following suggested time frame: a) a PG convener should distribute the first WD or CD to all that PG's members within six months of the proposal to establish the PG being approved;	Possible discussion point of the PG ... a review of current practices and experiences ... leading to a proper set of recommendations on “suggested” time frames for all of 6.12.	This can be considered as part of stage 2 of the project.

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					<p>There is a HUGE difference here between a “brand new” Recommendation being developed (starting from a blank sheet of paper) and revising an existing Recommendation.</p> <p>We do not believe that we have <u>ever</u> seen the first draft of a brand-new Recommendation developed within 6 months. Perhaps the suggested time frame for a brand-new Recommendation should be more like 12 months.</p>		
0050 PL	1	6.13and 7.3	6.13.3	ge / ed	<p>According to the rules described in 6.4.5 of 1CD revision of OIML B-1_2019-clean 20221202 references to other publications of OIML shall be indicated by reference numbers and publication dates. Therefore, the reference to OIML B 6-2 in 6.13.3 and 7.3 is given incorrectly.</p> <p>In addition, according to the title of this document given on the first page of OIML B 6-2, the expression "technical work" is written starting with a lowercase letter.</p>	Correctly it should be: OIML B 6-2:20xx <i>Directive for OIML technical work - Part 2: Guide to the drafting and presentation of OIML publications</i> (see references to OIML publications in 2.4 of 1CD revision of OIML B 6-2_2019-clean 20221202).	Agreed.
0051 US-27	1	6.14.5		Gen/ed	Proposed improvement.	Suggested 6.14.5 edit: According to 6.1.8, there shall be at least six P-members in a TC or SC, from at least two different regions. <b>unless a different allocation is decided by the CIML.</b>	Agreed.
0052 SA	1	6.16		ge	Provide consultation relevant recommendation after approved and published at need	Add new clause	Not agreed. A specific proposal for the text to be included in a new clause has not been provided.
0053 DE	1	7.2		Te	<p>The clause explains the content of a ‘project proposal’ but does not explicitly mention what parties are allowed/encouraged to formulate those proposals. Considering that clause 5.6 lists the task ‘a) proposing new projects’ for CIML members, it could be inferred that CIML members have that responsibility.</p>	<p>Explicitly state who is responsible for proposing new projects. By what means can a member state propose new OIML publications or revisions of existing OIML publications.</p> <p>If the respective information is already in the document, a link or reference would be helpful.</p>	Agreed.

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0054 PL	1	7.3		ed	In the first sentence of the text, the word "part" is incorrectly written starting with a lowercase letter "p".	In this sentence, the word "part" should begin with a capital letter "P".	Agreed.
0055 PL	1	7.3	a) – e)	ed	In both Parts of 1CD of OIML B 6, the description of the individual Parts of OIML Recommendations and their titles should be identical (please note and compare subclause 3.3.1 of 1CD of OIML B 6-2 :20xx and subclause 7.3 of 1CD of OIML B 6-1 :202x with each other).	It is proposed to harmonize these descriptions for both Parts of OIML B6.	Agreed.
0056 PL	1	7.5	7.5.1 / 7.5.1.1	ed	In the text of 7.5.1., the word "part" is incorrectly written starting with a lowercase letter "p".	In this text, the word "part" should begin with a capital letter "P".	Agreed.
0057 PL	1	7.5	7.5.2 / 7.5.2.5 b)	te	The symbol "x" described in 7.5.2.5 b) as "the number of the approved CD" is also used in 1CD revision of OIML B-1_2019-clean 20221202 (see 6.4.2.2 and 6.13.1) as a symbol of the SC.	Consideration should be given to using a symbol other than the "x" for "the number of the approved CD".	Not agreed as it is clear that "x" relates to the number of the CD in this instance.
0058 PL	1	7.5	7.5.4	ed	1CD revision of OIML B 6-1:2019 does not contain subclause 6.106.10.	It is proposed to insert the correct OIML B 6-1 reference number.	Agreed.
0059 PL	1	7.5	7.5.5	ge	According to the rules described in 6.4.5 of 1CD revision of OIML B-1_2019-clean 20221202 references to other publications of OIML shall be indicated by reference numbers and publication dates. Therefore, the reference to OIML B 16 in 7.5.5 is given incorrectly.	Correctly it should be: OIML B 16:2011 <i>Terms of reference for the Presidential Council</i> (see references to OIML publications in 2.4 of 1CD revision of OIML B 6-2_2019-clean 20221202).	Agreed.
0060 DE	1	7.5.1.3		Te	The phrase "If the level of response (number of votes submitted) to a request to vote and comment is unacceptably low..." is too vague to produce any real consequences.	Introduce a minimum percentage of required responses.	Agreed. Will make reference to the figure specified in 6.11.2.1.
0061 US-28	1	7.5.1.3		ed	From 7.5.1.3: "For second and subsequent CDs the BIML shall post on the OIML website marked up and clean versions of the CD, together with the comments on the previous CD with the PG convener's or PG's responses, and ask all members of the PG for comments, and ask P-members for votes."  Long and complex sentence ... suggested edit provided.	For second and subsequent CDs, the BIML shall post on the OIML website both marked-up and clean versions of the CD, together with the comments received on the previous CD and responses from the PG convener and/or the PG. The BIML shall ask all members of the PG for comments and ask all P-members for votes.	Agreed.
0062	1	7.5.1.3		gen	Germany had the following comment on 7.5.1.3:	Discussion point for the B6 PG.	See response to 0060.

<sup>1</sup> Country code (enter the ISO 3166 two-letter country code, e.g. CN for China)

<sup>2</sup> Type of comment: ge = general te = technical ed = editorial

## Template for comments and convener's observations

Date:2023-04-20

Document: BIML\_SC3\_P3\_N004

Project: BIML/SC 3/p 3

Country Code <sup>1</sup>	Part	Clause/ Subclause	Paragraph/ Figure/Table	Type of comment <sup>2</sup>	Comments	Proposed change	Convener's responses
US-29					<p>The phrase “If the level of response (number of votes submitted) to a request to vote and comment is unacceptably low...” is too vague to produce any real consequences.</p> <p>The US supports this comment ... need to add an actual numerical requirement to this.</p>		
0063 US-30	1	7.5.2.3		gen	Our experience is that the BIML is heavily involved at the stage of 7.5.2.3 (assisting the PG convener in producing the draft publication) ... and should be mentioned more directly in 7.5.2.		Agreed.
0064 DE	1	7.5.2.5	list item c)	Te	It is unclear what happens to comments submitted during a minor change procedure if the modified CD is accepted.	Either forbid comments to be submitted or allow only editorial comments to be implemented after approval of a modified CD.	Agreed.
0065 US-32	1	7.5.3		gen	<p><u>Last sentence:</u> “This shall ideally be done no more than five months after the close of the voting and commenting period on the previous CD.”</p> <p>This is a HUGE change from the previous B6 ... changing the suggested time frame between CDs from 8 months to five months. We tend to disagree with this change ... especially in cases where a PG meeting is required between CDs.</p> <p>This change needs to be discussed and agreed by the B6 PG before implementation.</p> <p>(see also US comment on 6.12)</p>	Discussion point for the B6 PG.	Not agreed. 6.12 d) specifies eight months between successive CDs, which includes the three-month commenting/voting period. Therefore, the five-month period is not new and is the effectively the same timeframe as specified in the current edition of B 6-1, 6.5.3.1.
0066 US-31	1	7.5.3.1		ed	<p>Don't need 7.5.3.1 as there is no 7.5.3.2.</p> <p>Also, unnecessary use of “to” in first sentence.</p>	The PG convener shall prepare a new CD, having considered and responded to each comment received and, if possible, <b>resolved all existing issues</b> before a new CD is prepared.	Agreed.

<sup>1</sup> Country code (enter the ISO 3166 two-letter country code, e.g. CN for China)

<sup>2</sup> Type of comment: ge = general te = technical ed = editorial

## Template for comments and convener's observations

Date:2023-04-20

Document: BIML\_SC3\_P3\_N004

Project: BIML/SC 3/p 3

Country Code <sup>1</sup>	Part	Clause/ Subclause	Paragraph/ Figure/Table	Type of comment <sup>2</sup>	Comments	Proposed change	Convener's responses
0067 PL	1	7.6	7.6.8 / 7.6.8.4 and 7.6.8.6	ge	According to the rules described in 6.4.5 of 1CD revision of OIML B-1_2019-clean 20221202 references to other publications of OIML shall be indicated by reference numbers and publication dates. Therefore, the references to OIML B 16 in 7.6.8.4 and 7.6.8.6 are given incorrectly.	Correctly it should be: OIML B 16:2011 <i>Terms of reference for the Presidential Council</i> (see references to OIML publications in 2.4 of 1CD revision of OIML B 6-2_2019-clean 20221202).	Agreed.
0068 DE	1	7.7.4		Ed	In other instances in the draft (such as 7.5.1.3), "marked-up" is also spelled as "marked up".	Please use uniform spelling throughout the document.	Agreed.
0069 PL	1	7.8	7.8.1 / 7.8.1.1	ed	In the text of last sentence of 7.8.1.1 phrase "Annex A" is duplicated.	Correctly is should be: "in Annex A. 6".	Agreed.
0070 PL	1	7.8	7.8.1 / 7.8.1.1 and Note 1 nad 2	ge	According to the rules described in 6.4.5 of 1CD revision of OIML B-1_2019-clean 20221202 references to other publications of OIML shall be indicated by reference numbers and publication dates. Therefore, the references to OIML B 1 in 7.8.1.1 (together with Note 1 and 2) are given incorrectly.	Correctly it should be: OIML B 1:1968 <i>OIML Convention</i> (see references to OIML publications in 2.4 of 1CD revision of OIML B 6-2_2019-clean 20221202).	Agreed.
0071 PL	1	7.8	7.8.2 / 7.8.2.1 and 7.8.3. / 7.8.3.4 and 7.8.4. / 7.8.4.1	ge	According to the rules described in 6.4.5 of 1CD revision of OIML B-1_2019-clean 20221202 references to other publications of OIML shall be indicated by reference numbers and publication dates. Therefore, the references to OIML B 1 in 7.8.2.1, 7.8.3.4 and 7.8.4.1 are given incorrectly.	Correctly it should be: OIML B 1:1968 <i>OIML Convention</i> (see references to OIML publications in 2.4 of 1CD revision of OIML B 6-2_2019-clean 20221202).	Agreed.
0072 US-33	1	7.11.2		ed	Suggested edit.	<b>A prior</b> convener of the PG that developed the publication may also be consulted as required.	Partially agreed.
0073 PL	1	7.12	7.12.5	ge	According to the rules described in 6.4.5 of 1CD revision of OIML B-1_2019-clean 20221202 references to other publications of OIML shall be indicated by reference numbers and publication dates. Therefore, the reference to OIML B 18 in 7.12.5 is given incorrectly.	Correctly it should be: OIML B 18:2022 <i>Framework for the OIML Certification System (OIML-CS)</i> (see references to OIML publications in 2.4 of 1CD revision of OIML B 6-2_2019-clean 20221202).	Agreed.
0074 NL	1	7.12.1		ge	"in consultation with the OIML-CS Management Committee," I think there is an institutional unbalance here. As the CS MC is explicitly consulted, but the TC and SCs are not. Nor the CIML members.. That looks strange to me: CS-MC becomes dominant in the review procedure; See also the next remark on 7.12.3 ('only')	"(...) after consulting the relevant TC or SC's. The OIML-CS Management Committee will be given te opportunity to advise on the periodic review of OIML publications. Periodic review is approved by the CIML."	Not agreed. The Presidential Council and the BIML sets the priority for periodic reviews. The MC is consulted due to the Recommendations and other publication of relevance to the OIML-CS.

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<sup>2</sup> Type of comment: ge = general te = technical ed = editorial

## Template for comments and convener's observations

Date:2023-04-20

Document: BIML\_SC3\_P3\_N004

Project: BIML/SC 3/p 3

Country Code <sup>1</sup>	Part	Clause/ Subclause	Paragraph/ Figure/Table	Type of comment <sup>2</sup>	Comments	Proposed change	Convener's responses
0075 NL	1	7.12.3		ge	Reading both 7.12.3 and 7.12.6 it looks like ONLY publications that are not deemed relevant for CS-MC ('other') are directed to the TC or SC. → ("...For <i>other</i> publications, the BIML shall submit the proposal to the appropriate TC or SC, ...'). This is undesirable imho.	7.12.6 For publications that are of relevance for the TC's , the BIML shall submit a review proposal to the appropriate TC or SC, with a three-month voting deadline.	See response to 0076.
0076 US-34	1	7.12.6		ed	Proposal for editorial improvement:	7.12.6 For publications <b>that are not of relevance to the OIML-CS</b> , the BIML shall ...	Agreed.
0077 US-35	1	7.13.1.1		gen	<p>"7.13.1.1 For publications of relevance to the OIML-CS, a Working Group under the responsibility of the OIML-CS Management Committee shall be established to develop an updated version of the publication in accordance with the working procedures of the OIML-CS Management Committee."</p> <p>Believe there should be some explicit involvement and/or consultation of the TC/SC when updating an OIML publication that is under their responsibility.</p>	Discussion point for the B6 PG.	Agreed. Will include a requirement to consult with the secretary of the relevant TC/SC.
0078 US-36	1	Annex A		ed	Missing/broken link.		Agreed.
0079 PL	1	Annex A	A.1, A.3 and A. 6 (first page of Annex A)	te and ed	For A.1, A. 3 and A.6, incorrect numbering for references in parentheses.	The correct numbering for references in parentheses for A.1, A.3 and A.6 is included in the table of contents and should be used in the first page of Annex A.	Agreed.
0080 PL	1	Annex A	Annex A.3 / flowchart	ge	According to the rules described in 6.4.5 of 1CD revision of OIML B-1_2019-clean 20221202 references to other publications of OIML shall be indicated by reference numbers and publication dates. Therefore, the reference to OIML B 16 in Annex A.3 is given incorrectly.	Correctly it should be: OIML B 16:2011.	Agreed.

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<sup>2</sup> Type of comment: ge = general te = technical ed = editorial

## Template for comments and convener's observations

Date:2023-04-20

Document: BIML\_SC3\_P3\_N004

Project: BIML/SC 3/p 3

Country Code <sup>1</sup>	Part	Clause/ Subclause	Paragraph/ Figure/Table	Type of comment <sup>2</sup>	Comments	Proposed change	Convener's responses
0081 PL	1	Annex A	Annex A.8 / flowchart	ge	According to the rules described in 6.4.5 of 1CD revision of OIML B-1_2019-clean 20221202 references to other publications of OIML shall be indicated by reference numbers and publication dates. Therefore, the twice references to OIML B 18 in Annex A.8 are given incorrectly.	Correctly it should be: OIML B 18:2022.	Agreed.
0082 PL	1	Annex B	Table (row 1, column 5)	ge	According to the rules described in 6.4.5 of 1CD revision of OIML B-1_2019-clean 20221202 references to other publications of OIML shall be indicated by reference numbers and publication dates. Therefore, the reference to OIML B 6-1 in Annex B is given incorrectly.	Correctly it should be: OIML B 6-1:202x.	Agreed.
0083 PL	1	Annex B	Table (row 5, column 5)	te	1CD revision of OIML B 6-1:202x does not contain clause or subclause 0.	It is proposed to insert the correct OIML B 6-1 reference number.	Agreed.
0084 PL	1	Annex B	Table (row 7, column 5)	ed	1CD revision of OIML B 6-1:202x does not contain subclause 1.1.1.	It is proposed to insert the correct OIML B 6-1 reference number.	Agreed.
0085 PL	2	Contents	2.7	ed	Incorrect name of the subclause 2.7 in the table of contents: "Planning". Lack of the page number of subclause 2.7.	It is proposed to insert the appropriate title of subclause 2.7: "File format" in the table of contents and to add the appropriate page number (page 7).	Agreed.
0086 PL	2	Contents	2.8	ed	Clause 2 in 1CD revision of OIML B-2_2019-clean 20221202 does not contain subclause 2.8.	It is proposed to delete subclause 2.8 from the table of contents.	Agreed.
0087 PL	2	1	1.1	ge	According to the rules described in 6.4.5 of 1CD revision of OIML B-1_2019-clean 20221202 references to other publications of OIML shall be indicated by reference numbers and publication dates. Therefore, the reference to OIML B 6-2 in 1.1 is given incorrectly.	Correctly it should be: OIML B 6-2:20xx.	Partially agreed. Will include wording "(this document)".
0088 US-37	2	2.1.3		ed	Suggested edit.	To achieve this objective, the requirements <b>and procedures</b> of an OIML Recommendation shall ...	Not agreed.
0089 DE	2	3		Te	The structure of the publication should clarify if a certain statement is an observation, a remark, a note or a requirement.	Please specify different structural forms for these different cases.	Not agreed. Notes are already clearly indicated as such. Not sure what is meant by "observation" or "remark".
0090 US-38	2	3.1		gen	Question: If ALL of Part 5 is optional (3.1.1) ... why is it that elements of Part 5 (3.1.2 and 3.1.7) are underlined and therefore mandatory??	Possible point needing clarification.	Agreed.

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<sup>2</sup> Type of comment: ge = general te = technical ed = editorial

## Template for comments and convener's observations

Date:2023-04-20

Document: BIML\_SC3\_P3\_N004

Project: BIML/SC 3/p 3

Country Code <sup>1</sup>	Part	Clause/ Subclause	Paragraph/ Figure/Table	Type of comment <sup>2</sup>	Comments	Proposed change	Convener's responses
0091 PL	2	3.1	3.1.2	ed	In the third sentence of subclause 3.1.2, the word "part" is incorrectly written twice, starting with a lowercase letter "p".	In this sentence, the word "part" should begin with a capital letter "P".	Agreed.
0092 SA	2	3.1.3		te	Add new requirement either Metrological requirements or in testing report to determine places of sealing of setting place for electronic and mechanical parts.	Add new item	Not agreed. The inclusion of this information will be for the Project Group to decide.
0093 DE	2	3.1.3 – 3.1.8		Ed	According to subclause 5.4.4, a subclause shall only bear a title if all neighbouring subclauses have a title as well. 3.1.1, 3.1.2, 3.1.9 and 3.1.10 have no title, though.	Reformat the subclauses as prescribed in 5.4.4.	Agreed.
0094 PL	2	3.3and Annex C	3.3.1	te	The symbol "p" described in 3.3.1 as "Part number" is also used in 1CD revision of OIML B-1_2019-clean 20221202 (see 6.4.2.1 and 6.4.2.2) as a symbol of the TC or SC projects.	The possibility of using a different symbol than "p" as "Part number" should be considered.	Not agreed. Using "p" in this context is correct to signify Part number.
0095 US-39	2	4.6.4		gen	<u>4.6.4 text:</u> If a term is already defined in one of the OIML Vocabularies this shall not be given another definition in an OIML Recommendation or other OIML publication.  Observation: a great number of existing/published OIML Recommendations would fail this requirement ... in fact, OIML G18 reflects and accommodates different definitions and terms in multiple Recommendations ... but maybe that is a discussion for another day ...	No change proposed.	Noted.
0096 PL	2	4.9		ge	According to the rules described in 6.4.5 of 1CD revision of OIML B-1_2019-clean 20221202 references to other publications of OIML shall be indicated by reference numbers and publication dates. Therefore, the reference to OIML D 11 in 4.9 is given incorrectly, and the current version of this document has a different title (see 2.4 g)).	The reference to OIML D 11 should be given as following: OIML D 11:2013 <i>General requirements for measuring instruments – Environment conditions</i> .	Agreed.
0097 SA	2	4.10		te	Requirements for Software check, also testing software and determine in test report which parts of the software are legally relevant and which are legally irrelevant.	Add new sentence	Not agreed. Examples of technical requirements are already provided.

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## Template for comments and convener's observations

Date:2023-04-20

Document: BIML\_SC3\_P3\_N004

Project: BIML/SC 3/p 3

Country Code <sup>1</sup>	Part	Clause/ Subclause	Paragraph/ Figure/Table	Type of comment <sup>2</sup>	Comments	Proposed change	Convener's responses
0098 SA	2	4.11		te	Suggestion to harmonize and unify the initial verification process and tests, also it will very helpful if OIML R suggests what types of legal metrology control are required for the relevant measuring instruments, for instance; periodic verification, after-repair verification, installation verification, required test for each verification, test influences, verification periodicity.	Add new sentence	Not agreed. These aspects should be specified in national requirements.
0099 SA	2	4.13		te	Suggestion: OIML-CS utilizers and beneficiaries if test report & evaluation report will list the essential parts, secondary parts, axillaries parts. To identify which qualification is required in case any modification had been occurred on measuring instrument design.	Add new subclause	Not agreed. Test reports and type evaluation reports already include a description of the instrument that was submitted for test and evaluation.
0100 US-40	2	4.14		Gen/ed	There seems to exist different interpretations on the exact contents of a test report and an evaluation report. Some clarification may be helpful.	Proposal: add the following sections:  "4.13.4 The test report format shall comply with the provisions defined in OIML-CS PD-05, 4.4 for recommendations under scheme B, or 5.4 for recommendations under scheme A."  "4.14.4 The evaluation report format shall comply with the provisions defined in OIML-CS PD-05, 4.5 for recommendations under scheme B, or 5.5 for recommendations under scheme A."	Not agreed. The current text already explains that a test report contains the results of <i>testing</i> whereas the type evaluation contains the results of <i>type evaluation</i> .
0101 PL	2	4.17 and 4.18		te	In clause 4 describing the content of individual elements of an OIML publication, only two types of annexes are included: "Mandatory" and "Informative", however, in some of the OIML publications (e.g. VIML) we can also find another type of annexes - "Normative".	The possibility of introducing a description of the Normative annex into the content of clause 4 should be considered.	Agreed.
0102 US-41	2	4.18.2Annex C		gen	"When an OIML Recommendation is revised a comparison table shall be included as an informative annex ..."	No change proposed.	Noted.

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<sup>2</sup> Type of comment: ge = general te = technical ed = editorial

## Template for comments and convener's observations

Date:2023-04-20

Document: BIML\_SC3\_P3\_N004

Project: BIML/SC 3/p 3

Country Code <sup>1</sup>	Part	Clause/ Subclause	Paragraph/ Figure/Table	Type of comment <sup>2</sup>	Comments	Proposed change	Convener's responses
					Observation: this is a good requirement! However, a great number of existing/published OIML Recommendations would fail this requirement ... but maybe that is a discussion for another day ...		
0103 PL	2	5.1 and 5.3	5.1.3 and 5.3.2	ed	In the subclause 5.1.3 and 5.3.2, the word "part" is incorrectly written starting with a lowercase letter "p".	In the content of these two subclauses, the word "part" should begin with a capital letter "P".	Agreed.
0104 PL	2	5.6	5.6.3	te	In 5.6.3 describing the titles of an annex only two types of annexes are mentioned: "Mandatory" and "Informative", however, in some of the OIML publications (e.g. VIML) we can also find another title of annex - "Normative".	Consideration should be given to the possibility of introducing into the content of 5.6.3 a third possible type of title of the annexes – "Normative".	Agreed.
0105 PL	2	6.1.2	a ) and b)	te	In accordance with 6.4.3.1.d) OIML B 6-2_2019-clean 20221202 forms of references to element of text should be written as following: "see <i>Example 1</i> " (for 6.1.2.1. a)) and "see <i>Example 2</i> " (for 6.1.2.1. b)).	It is proposed to make changes in 6.1.2.1. a) and 6.1.2.1. b) according to the rules described in 6.4.3.1.d).	Agreed.
0106 PL	2	6.3	6.3.7	ge	According to the rules described in 6.4.5 of 1CD revision of OIML B-1_2019-clean 20221202 references to other publications of OIML shall be indicated by reference numbers and publication dates. Therefore, the reference to OIML D 2 in 6.3.7 is given incorrectly.	The reference to OIML D 2 should be given as following: OIML D 2:2007 <i>Legal units of measurement</i> (see references to OIML publications in 2.4).	Agreed.
0107 PL	2	6.4	6.4.6	ge	According to the rules described in 6.4.5.1 of 1CD revision of OIML B-1_2019-clean 20221202 references to International Standards shall be indicated by reference numbers and publication dates and full details (e.g. title of International Standard) of all references should be given in Annex (please find also 4.18.2 and 5.6.3). Therefore, the reference to ISO 690:2010 in 6.4.6 is given incorrectly because 1CD revision of OIML B-1_2019-clean 20221202 is missing an Annex with full details of bibliographic references (e.g. the title of ISO 690:2010 <i>Information and documentation – Guidelines for bibliographic references and citations to information resources</i> ).	It is proposed to add to the 1CD revision of OIML B-1_2019-clean 20221202 informative annex (e.g. Annex with title "Bibliography") containing the full data for the ISO 690:2010 (see 6.4.5.1, 4.18.2 and 5.6.3) or to complete the title of ISO 690:2010 in the text of 6.4.6 as following: <i>Information and documentation – Guidelines for bibliographic references and citations to information resources</i> (see references to OIML publications in 2.4).	Agreed.

<sup>1</sup> Country code (enter the ISO 3166 two-letter country code, e.g. CN for China)

<sup>2</sup> Type of comment: ge = general te = technical ed = editorial

## Template for comments and convener's observations

Date:2023-04-20

Document: BIML\_SC3\_P3\_N004

Project: BIML/SC 3/p 3

Country Code <sup>1</sup>	Part	Clause/ Subclause	Paragraph/ Figure/Table	Type of comment <sup>2</sup>	Comments	Proposed change	Convener's responses
0108 PL	2	6.6	6.6.6	ge	According to the rules described in 6.4.5.1 of 1CD revision of OIML B-1_2019-clean 20221202 references to International Standards shall be indicated by reference numbers and publication dates and full details (e.g. title of International Standard) of all references should be given in Annex (please find also 4.18.2 and 5.6.3). Therefore, the reference to ISO 8601:2004 in 6.4.6 is given incorrectly because 1CD revision of OIML B-1_2019-clean 20221202 is missing an Annex with full details of bibliographic references (e.g. the title of ISO 8601:2004 <i>Data elements and interchange formats – Information interchange – Representation of dates and times</i> ).	It is proposed to add to the 1CD revision of OIML B-1_2019-clean 20221202 informative annex (e.g. Annex with title "Bibliography") containing the full data for the ISO 8601:2004 (see 6.4.5.1, 4.18.2 and 5.6.3) or to complete the title of ISO 8601:2004 in the text of 6.4.6 as following: <i>Data elements and interchange formats – Information interchange – Representation of dates and times</i> (see references to OIML publications in 2.4).	Agreed.
0109 PL	2	6.6	6.6.6.6.5.1 and 6.6.5.2	te	According to the OIML V2-200:2012 (see 1.2 of VIM), The International System of Units – 9 <sup>th</sup> edition (see 5.4.1 of the SI Brochure) and ISO 80000-1:2022 (see 6.2) the term "numerical values of a quantities" should be used instead of the term "numerical values of physical quantities".	It is proposed to make changes in 6.6.5.1 and 6.6.5.2 according to the terminology described in OIML V2-200:2012, 9 <sup>th</sup> edition of the SI Brochure and ISO 80000-1:2022. It is proposed to used term "numerical values of a quantities"	Agreed.
0110 PL	2	6.7	6.7.1.4	ge	According to the rules described in 6.4.5.1 of 1CD revision of OIML B-1_2019-clean 20221202 references to International Standards shall be indicated by reference numbers and publication dates and full details (e.g. title of International Standard) of all references should be given in Annex (please find also 4.18.2 and 5.6.3). Therefore, the reference to IEC 61293:1994 in 6.7.1.4 is given incorrectly because current version of this standard is IEC 61293:2019. In addition, 1CD revision of OIML B-1_2019-clean 20221202 is missing an Annex with full details of bibliographic references (e.g. the title of IEC 61293:2019 <i>Marking of electrical equipment with ratings related to electrical supply – Safety requirements</i> ).	It is proposed to add to the 1CD revision of OIML B-1_2019-clean 20221202 informative annex (e.g. Annex with title "Bibliography") containing the full data for the current version of IEC 61293:2019 (see 6.4.5.1, 4.18.2 and 5.6.3) or to complete the title of the current version IEC 61293:2019 in the text of 6.7.1.4 as following: <i>Marking of electrical equipment with ratings related to electrical supply – Safety requirements</i> (see references to OIML publications in 2.4).	Agreed.
0111 DE	2	Annex B		Te	To enable readers to easily distinguish between requirements and other clauses, please limit the allowed verbal forms to the accepted minimum in ISO and IEC and IETF, see RFC2119	Delete all non-essential terms, make capitalization of those keywords mandatory.	??

<sup>1</sup> Country code (enter the ISO 3166 two-letter country code, e.g. CN for China)

<sup>2</sup> Type of comment: ge = general te = technical ed = editorial

## Template for comments and convener's observations

Date:2023-04-20

Document: BIML\_SC3\_P3\_N004

Project: BIML/SC 3/p 3

Country Code <sup>1</sup>	Part	Clause/ Subclause	Paragraph/ Figure/Table	Type of comment <sup>2</sup>	Comments	Proposed change	Convener's responses
0112 PL	2	Annex C		ed	In the first sentence of text above the table, the word "part" is incorrectly written starting with a lowercase letter "p".	In this sentence, the word "part" should begin with a capital letter "P".	Agreed.
0113 US-01	all			gen	<p><u>Main US Comment:</u> Thank you to the PG convener for the thorough review and extensive drafting to produce the 1CD of B6.</p> <p>While the US is providing several thoughts, comments, and suggested edits on the 1CD (below) ... overall, we are quite pleased with the rapid progress and big-picture direction of "Step One" of this two-step revision effort.</p> <p>The US looks forward to continuing to assist with this project as it moves forward. Please let us know if you have any questions about any of our comments or proposed changes.</p>		Noted.
0114 US-02	all				We found a few instances where references to other sections were either wrong or missing.	Please double-check all references to other sections before the 2CD.	Agreed.

<sup>1</sup> Country code (enter the ISO 3166 two-letter country code, e.g. CN for China)

<sup>2</sup> Type of comment: ge = general te = technical ed = editorial