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Compiled comments on Committee Draft			OIML TC 8/SC 7/P04/N066/CC
TC8 / SC7 Comments on: OIML TC 8/SC 7/P04/N063_CD	Committee Draft: OIML CD R139-3	Title: <i>Compressed gaseous fuel measuring systems for vehicles</i>	Project: p4 ; revision of R 139 <i>Compressed gaseous fuel measuring systems for vehicles</i>
CD date: 22 May 2014	Circulation date: 5 September 2014	Closing date for comments: 23 August 2014	
Secretariat: NL Mr. George Teunisse			

Country Code	Clause/ paragraph/ table	gen./ edit./ techn.	COMMENTS	PROPOSED CHANGE	OBSERVATIONS OF THE SECRETARIAT on each comment submitted
SE-1		Gen	The OIML 139-3 should be made available also in Word format, to facilitate its use (and reduce risk for mistakes)	Make OIML R139-3 available also in Word format	Your request will be forwarded to BIML as being responsible for the publication of Recommendations
FR-1	General	Gen.	No comments		Thank you
JP-1	General	Gen.	No comments		Thank you
PL-1	General	Gen.	No comments		Thank you
ZA-1		edit	The header include “Project page..... of.....”, is not necessary because it is also in the footer of the page	Remove the project page numbering in the header.	Not agreed while a part 3 concerns a template. In the footer on finds the page numbers of this part 3. It is the intension that this template is converted by the applicable evaluating authority to an actual report which will not contain the first 4 introductory pages of the template and may need to contain additional pages. It is requested to this authority to insert the pagenumber of the report in the heading.
CH-1	Foreword	Edit.	...Subcommittee TC8/SC7 It was approved...	...Subcommittee TC8/SC7. It was approved...	Corrected
CH-2	Introduction	Edit.	...to which a type of an compressed...	...to which a type of a compressed	Corrected
CH-3	Introduction	Edit.	...its approval based this OIML...	...its approval based on this OIML...	Corrected
CH-4	Introduction	Edit.	...report format , as is,...	...report format, as is, ...	Corrected
ZA-2	Contents	edit	“F Performance tests” is not included in the “Contents of the Evaluation Report”.	Include “F Performance tests” in the Contents of the Evaluation Report.	Corrected and also included subs of E
AU-1	3	Edit.	In the first table in clause 3, I am not sure why the first column has the word “Passed” in every cell. Perhaps this should instead refer to a test clause against which a pass/fail determination is made?	Suggest replacing the word “passed” with something like “clause XX” or “test XX”.	Thank you ; amended

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AU-2	C.1	Edit.	The first column in table C1 refers to the clauses in OIML R 139. These clauses are actually found in OIML R 139 part 1 or Part 2. Would it be possible to make this distinction?	Suggest including the reference to either Part 1 or Part 2 of OIML R 139.	Amended by inserting the Part number referred to.
BE-1	5.2.4/C.1	Edit.	To use the formula used in R 139-1 with the parameters in the same order	$E_{\min} = 2 * MMQ * R_{MPE} [g; kg]$	Probably E.2 is referred to; amended
BE-2	6.2.9/C.1	Edit.	Change the reference in the table of R-139-3 with the reference used in R-139-1	6.2.8 Printing device	Corrected
BE-3	6.2	Gen.	In R 139-1 I don't find this point "Flow direction" for the clause 6.2	Create a new point in R 139-1 with other reference point 6.15 Flow direction it is a solution	The page containing E3 appears to be incorrect. Completely amended
DE-1	A1, A2	gen	The validation methods DFA/CIWT/SMT are very challenging if the results shall be reliable. The need is only given if the instrument is under high risk.	Checking whether or not a restriction of application is possible as agreed for R 137	See OIML R 139-2. A footnote is inserted to refer to the note in this Part 2.
UK-1	B Synopsis of the results of the evaluation	gen.	"OIML R 139-1 (2014)", "OIML R 139-1, Edition 201x" and "OIML R 139-1 &-2 (201x)" are used in the draft.	Suggest changing "OIML R 139-1 (2014)" to "OIML R 139-1 &-2 (201x)" and also standardising where appropriate.	Only R 139-1 contains criteria. The date is for the BIML editor to adjust when published
UK-2	C.1 Examinations , E8	gen.	"Pre-setting device" and "Presetting device" are used in the draft	Suggest using "Pre-setting" in all instances	Corrected to "presetting". "pre-setting could be misinterpreted.
UK-3	C.1 Examinations , E10	gen.	"Emergency power supply device" is used only once in the draft and "Emergency power supply" used several times	Suggest using "Emergency power supply" in all instances	E 10 which refers to Part 1: 6.8 should be "Emergency power supply device" Corrected as such.
CH-5	C.1	Edit.	(Referring to clauses in of R 139)	(Referring to clauses of R 139)	Corrected. In C2 as well
CH-6	C.1 and C.2	Edit.	The tables in C.1. and C.2 mention either 'Clause(s) in R 139' or 'Clause R139'. Moreover, The third columns in the tables show either 'Complies with OIML R 139' or 'Complies with R 139'.	'Clause in OIML R 139' and 'Complies with OIML R 139'	Amended in a somewhat different way
BE-4	C.2	Edit	The reference 17.2.7.x is mistake. That is different in R 139-2	Replace 17.2.7.1 by 17.2.5.1 Replace 17.2.7.2 by 17.2.5.2 Replace 17.2.7.3 by 17.2.5.3 Replace 17.2.7.4 by 17.2.5.4 Replace 17.2.7.5 by 17.2.5.5 Replace 17.2.7.6 by 17.2.5.6 Replace 17.2.7.7a by 17.2.5.7a Replace 17.2.7.7b by 17.2.5.7b	You appear to refer to a previous committee draft version. The drafting of OIML R 139-1 and OIML R 139-2 is actually in CIML approval stage for which the final drafts are available to CIML members
BE-5	C.2	Edit.	The reference 18.9.4.x is mistake. That is different in R 139-2	Replace 18.9.4.2 by 18.9.2 Replace 18.9.4.3 by 18.9.3 Replace 18.9.4.4 by 18.9.4 Replace 18.9.4.5 by 18.9.5	See reply on BE-4

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BE-6	C.2	edit.	Use the same format for the clause Same time is E.xx other time it is used E.xx (reference from R 139)	Used the format E.xx (reference from R 139) E.g. replace E4 by E4 (6.2) replace E5 by E5 (6.3) replace E6 by E6 (6.4) replace E8 by E8 (6.6) replace E13 by E13 (A.1) replace E14 by E14 (6.12) replace E15 by E15 (6.14) replace E16 by E16 (8) replace E18 by E18 (10) replace E19 by E19 (11) replace E20 by E20 (13) replace E21 by E21 (14) replace E22 ^[15] by E20 (15) replace E23 by E23 (18.2)	Amended; harmonized
UK-4	D.3 Testing laboratories involved in the tests	gen.	Row for “Date of signature” comes before the row for “Stamp (where applicable) and signature of the responsible person”	Normally the date of signature follows the signature in reports. Suggest rearranging the row to reflect this.	The sequence is according to the template. No change
CH-7	D.4, E, F.1	edit.	The tables on D.4, E and F linking the clauses to R139-1 and R139-2 show not harmonised references in the first column, for instance: First column in table of D.4 mentions ‘R 139-1 Clause’ while table of E mention only ‘Clause’	Harmonise	Harmonized for D and E. F (actual tests) requires a little bit different approach. (Sub. applied as abbreviation of Sub clause)
ZA-3	D.6	edit		Change to Bold print	Corrected
ZA-4	D.6	edit		“Year of make” change to “Year of manufacture”	Corrected
UK-5	E.2, E.22 , E.16, F.1, F.2, etc.	gen.	“Qmin, Qmax, Pmax, Pmin, Tmax and Tmin” are written with and without subscripts in various parts of the draft.	Suggest standardising for clarity using subscript throughout: Q_{min} , Q_{max} , P_{max} , P_{min} , T_{max} and T_{min}	Editorial activity in later phase. Not only subscripts but also italics for the quantities (capitals) to be introduced Most yet amended
SE-2	E4, 6.2.8.6, b	edit.	Height of digits shall be at least 2 mm, i.e. may be equal to, but is specified as > 2 mm	Change > to \geq	Amended
ZA-5	E4	techn	≥ 2 mm is the norm for printing heights of digits.	Include the symbol “ \geq ”	See SE-2
UK-6	E7	gen.	“Zero-setting device” and “Zerosetting device” are used	Suggest using “Zero-setting” in all instances	Zerosetting is not applied. Only where it concerns the name of the device the dash is applicable. Corrected (2x)
AU-3	F	edit.	Throughout all the test report formats in clause F, the MPE are defined as “For meter < 1; For system < 1.5”. Technically the MPEs are: For the meter ≤ 1 % For the System ≤ 1.5 %	Suggest replacing “For meter < 1; For system < 1.5” with “For meter ≤ 1 ; For system ≤ 1.5 ” throughout clause F.	Amended
AU-4	F	edit.	Similarly, throughout clause F, the repeatability MPEs are defined as “Meter < 0.6; System < 1”. These should be “Meter ≤ 0.6 ; System ≤ 1 ”.	Suggest replacing the repeatability MPEs “Meter < 0.6; System < 1”, with “Meter ≤ 0.6 ; System ≤ 1 ” throughout clause F.	Amended

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SE-3	F1 – F19	edit	The term “Environmental temperature” is used in most of reports F1 – F19, should be “Ambient temperature”	The term “Ambient temperature” should be used instead.	Amended
SE-4	F1 – F19	edit/ techn	MPE in reports F1 – F19 is specified as less than, i.e. <, but as it is <u>maximum permissible</u> , the signs should be changed to less or equal to, i.e. ≤	Change < to ≤	Amended
UK-7	F11, F12, F13, F14, etc.	gen.	Column headers such as “stabilize” “after”, “initial” start with lowercase letters whilst some are Uppercase.	Suggest standardising text case in all instances for clarity.	Editorial activity to be performed in a later phase
AU-5	F	edit.	For the clauses F.12 to F.19 inclusive, compliance with the MPE is not a criterion of the test. See OIML R 137-2 clause 18.9, tables 25 to 34. Instead the relevant criterion is whether a significant fault has occurred.	Suggest deleting reference to the MPE values in tables F.12 to F.19 inclusive.	It is true that the fault limit is the criterion for these tests during or after exposure. For that space is reserved to enter whether a fault occurred, and whether this fault was significant. However the test sequence also requires verifying initially and after the test whether the instrument is still operating within MPE. For that the MPE value is presented. Amended by adding applicable fault limit values