

Template for comments and convener's observations

Date:2019-07-18

Document: 1CD of Rev. of OIML D10

Project: TC4/p9

Country Code ¹	Part	Clause/ Subclause	Paragraph/ Figure/Table	Type of comment ²	Comments	Proposed change	Convener's responses
0001 CU					No comments		
0002 FR					No comment		
0003 IR					No comment at this stage		
0004 KZ					No comments		
0005 UK					We have reviewed the documents and have no comments		
0006 ILAC	1	Title		Te	The applicability of the guidelines should be not restricted for testing laboratories.	Change title to “Guidelines for the determination of recalibration intervals of measuring equipment” used in testing laboratories	Accepted Further “ <i>testing laboratory</i> ” was replaced by “ <i>laboratory</i> ” in the all text.
0007 ILAC	1	Foreword		Ge	Being a document issued together by ILAC and OIML it shall have not only an OIML foreword but also an ILAC foreword.	Update accordingly. The ILAC Secretariat will provide the current text for the ILAC forward prior to the document being distributed for ballot.	Accepted
0008 ILAC	1	Scope		ed	First sentence says “calibration system” while the term used in ISO/IEC 17025:2017 is “calibration program”. Further ILAC wish to apply the document not only to laboratories but also other Conformity Assessment Bodies. We are unsure about the need to address other relevant parties and suggest that term to be deleted.	Change first sentence to be: “The purpose of this document is to give laboratories guidance on how to determine recalibration intervals of measuring equipment while setting up their calibration program. The document is applicable also to other Conformity Assessment Bodies (e.g. Inspection Bodies and Certification Bodies) who utilize measuring equipment.”	Accepted The text was reworded as follows (see also comment 0009 RU): “ <i>The purpose of this document is to give laboratories guidance on how to determine recalibration intervals of measuring equipment while setting up their calibration program. The document is applicable also to other Conformity Assessment Bodies (e.g. Inspection Bodies and Certification Bodies) and other parties (e.g. manufactures) who utilize measuring equipment.</i> ”

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0009 RU	1	general		gen	The document is addressed solely to the testing laboratory, that is, to the owner (operator) of the measuring instrument or measuring system, and does not mention developer, manufacturer or supplier and, finally, calibration laboratory who are participants in the activity aimed at confirming the conformity of measuring instruments to metrological requirements.	To extend the recommendation to all potential participants in the activity aimed at confirming the conformity of measuring instruments to metrological requirements., or, at least, to calibration laboratories.	Accepted. The text was reworded as appropriate. See also comments 0006 and 0008 from ILAC.
0010 JP1	1	Many clauses	NA	Ge/Te	<p>In 1CD, “measuring <u>instrument</u>” was replaced with “measuring <u>equipment</u>” in many clauses. We consider that this change is due to a fact that the latter is used in ISO standards such as ISO/IEC 17025 and ISO 10012. However, “measuring equipment” is not used commonly in metrology and it is defined neither in VIML (V 1:2013) nor VIM (V 2-200).</p> <p>On the other hand, “measuring system” is used frequently in metrology and it is defined 0.12 of VIML. This term seems to have a similar meaning with “measuring equipment”.</p> <p>Although we prefer “measuring system”, “measuring equipment” is acceptable because this is a joint document and this term is used commonly in ILAC. If the latter is employed in this document, please explain the difference from “measuring instrument”. Definitions in Clauses 3.7 and 3.8 do not explain the difference clearly.</p> <p>In addition, “measuring instrument” remains in 5.2, 6.3.1, 6.4.1, 6.5.1, 6.6.1, 6.6.2 and 6.7.1. In some clauses, it should be corrected.</p>	<p>We recommend adding a note to 3.7 or 3.8 regarding the difference between “measuring instrument” and “measuring equipment” as proposed below.</p> <p><i>Note for D 10: A measuring instrument is a component of a measuring equipment which plays an important role for measurement. Some measuring instrument can be used independently to complete a measurement process or realize a physical quantity.</i></p> <p>In addition, “measuring instrument” should be replaced with “measuring equipment” in Clauses 5.2, 6.3.1, 6.5.1 and 6.6.2.</p>	<p>Accepted.</p> <p>To harmonise the different terminology used by OIML and ILAC, following actions were implemented:</p> <p>New item 3.8 for measuring system was added in terminology:</p> <p><i>“3.8 measuring system set of one or more measuring instruments and often other devices, including any reagent and supply, assembled and adapted to give information used to generate measured quantity values within specified intervals for quantities of specified kinds Note A measuring system may consist of only one measuring instrument.”</i></p> <p>Two notes were added in the definition of item 3.9 measuring equipment:</p>

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							<p><i>“Note 1 A measuring instrument is a component of a measuring equipment which plays an important role for measurement. Some measuring instrument can be used independently to complete a measurement process or realize a physical quantity.</i></p> <p><i>Note 2 The measuring equipment is equal to measuring system.”</i></p> <p>The “<i>measuring instrument</i>” was replaced with “<i>measuring equipment</i>” in clauses 5.2, 6.3.1, 6.5.1 and 6.6.2.</p>
0011 ILAC	1	1		Ed	This Guidance Document...	This guidance document...	Accepted
0012 ILAC	1	1	a)	Te	It is not the role of this document to state which are and which are not the responsibilities of accreditation bodies.	Delete 1 a)	Accepted
0013 AU	1	1	c)	ed	The point requires a “the” or “each” ahead of “testing laboratory”.	Point c) should be amended as either: “It is also the responsibility of the testing laboratory...” “It is also the responsibility of each testing laboratory...”	Accepted The point b) (before point c)) – see also comments 0012 and 0014 ILAC, was reworded as follows: “ <i>b) it is the responsibility of each laboratory to evaluate ...</i> ”
0014 ILAC	1	1	c)	ed	Better readability	Insert word “each” before “testing laboratory” and delete “testing”	Accepted
0015 RU	1	3	03.7, 3.8	gen	The term measuring equipment from ISO 10012 is used, as a more general term with respect to the term “ measuring instrument ”.	It seems more appropriate to include the term “ measuring system ” in the document (term 3.2 from OIML V2-200: 2012).	Partially accepted.

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							To harmonise the different terminology used by OIML and ILAC, see response in 0010 JP1.
0016 ILAC	1	3	Definitions	Ge	<p>The definitions should be reduced. One reason is that the VIM is under revision. Another is that some of the definitions only have relevance in the part dealing the “Terms and definitions”.</p> <p>It is suggested that definitions 3.1 and 3.6 (measurement uncertainty and reference value) are deleted because they are not used in the body text.</p> <p>Definition 3.3 is not referenced as such in the body text. It is usually referred to as “result”. This inconsistency is not appropriate.</p> <p>Definitions 3.2, 3.7 and 3.8 (calibration, measuring instrument and measuring equipment) should also be deleted. IN ISO 17025:2017 those are referenced similarly even not with a reference to the VIM.</p> <p>Definition 3.10 (testing) is not complying with the ISO 17000 revision and a definition of a calibration laboratory is neither included. Both are not seen to be necessary</p> <p>Definition 3.9 (CMC) misses the definition in ISO 17011 and in the Joint paper between ILAC and BIPM (as described in ILAC P14). However this definition is only used for clause 4.4 which can be rewritten.</p> <p>This leaves few definitions from the VIM (3.4+3.5) and somehow it would be better as a principle to refer to those clauses in the Body text as it is also done specifically in ISO/IEC 17025:2017.</p>	<p>Delete all clauses in part 3 and insert the following text:</p> <p>“Terms and definitions used in this document will be in compliance with the VIM [1], [14] and ISO/IEC 17000 [20] and referenced where appropriate.”</p> <p>Also make ISO/IEC 17000 a reference (may be the updated one if that is published before D10/G24.</p>	<p>Not accepted</p> <p>According to clause 4.6.1 of OIML B 6-2 “The terms and definitions element provides the necessary definitions for understanding certain terms used in the publication/document.”</p> <p>According to clause 3.2.1 of OIML B 6-2, “Terms and definitions” is the part of document structure.</p> <p>The purpose of “term and definitions” is to provide definitions of the terms that are used in the document without necessity to use/read other documents or minimize it - to have comprehensive document.</p> <p>The definition 3.1 - measurement uncertainty, uncertainty of measurement, uncertainty (VIM, 2.26) is used in the clauses 4.2, 5.1.</p> <p>The definition 3.10 - reference quantity value, reference value (VIM, 5.18) is used in the clauses 4.2, 6.2.1.</p>

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							<p>The definition 3.4 - measurement result, result of measurement (VIM, 2.9) is used in the clauses 4.1, 6.2.1 (note).</p> <p>The definition 3.2 - calibration (VIM, 2.39) is used in the clauses 4.1, 4.2, 4.3, 4.4, 4.9, 5.2, 6.1.1, 6.1.2, 6.1.3, 6.2.1, 6.3.2 (note), etc.</p> <p>The definition 3.11 - measuring instrument (VIM, 3.1) is used in the clauses 4.8, 6.4.2, 6.6.1.</p> <p>The definition 3.13 - measuring equipment (ISO 10012: 2003, 3.3) is used in the clauses 4.1, 4.2, 4.6, 4.8, 4.9, 5.1, 5.2 etc. This definition is important to harmonise the different terminology used by OIML and ILAC. Also definition 3.12 - measuring system (VIM, 3.2) was added in the terminology because of this harmonisation.</p> <p>The definition 3.14 - calibration and measurement capability (CIPM MRA-D-04) is used in the clause 4.4. This clause is important concerning the suggestion where the accepted calibration may be carried out.</p>

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							<p>The definition 3.7 - instrumental drift (VIM, 4.21) is used in the clauses 6.1.1, 6.3.1, 6.3.2..</p> <p>The definition 3.8 - maximum permissible measurement error, maximum permissible error, limit of error (VIM, 4.26) is used in the clauses 5.1, 5.2, 6.1.2, 6.5.1, 6.5.2</p>
0017 DE	1	3.10		Ed	Please correct sentence (insert “of” and “a”)	Replace “body that performs determination one or more characteristics of testing object” by “body that performs determination of one or more characteristics of a testing object”	Accepted
0018 JP2	1	3.10 testing laboratory	1 st sentence	Te/ed	We recommend the definition of “testing laboratory” be compliant with that of “testing” in A.10 of VIML (OIML V 1: 2013).	<p>Recommend the following change.</p> <p><i>3.10 testing laboratory</i></p> <p><i>body that performs determination one or more characteristics of testing an object of conformity assessment, according to a procedure</i></p>	<p>Accepted</p> <p>See also response to comment 0017 DE.</p>
0019 JP3	1	4	General aspects	Te	When some measuring equipment is calibrated, each device or measuring instrument which composes the equipment must be calibrated separately. We propose adding a note regarding such a calibration scheme.	<p>Recommend adding a note to an appropriate clause in Chapter 4 as proposed below.</p> <p><i>Note: For some kinds of measuring equipment, each device or measuring instrument which composes the equipment must be calibrated separately. In this case, a combined measurement uncertainty of the measuring equipment is calculated from the uncertainties arose from all devices and measuring instruments.</i></p>	<p>Accepted.</p> <p>The note was added to clause 4.8 as follows:</p>

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							<i>Note: For some kinds of measuring equipment, each device or measuring instrument which composes the equipment must may be calibrated separately. In this case, a combined measurement uncertainty of the measuring equipment is calculated from the uncertainties arose from all devices and measuring instruments.</i>
0020 ILAC	1	4.1		ed	Correct grammar	Insert “a” and delete testing so that there is “a laboratory” in the first line.	Accepted
0021 ILAC	1	4.1		Te	The references to all the standards are problematic. This will make this document needing to be revised almost every second year which is not appropriate.	Delete 2 nd sentence of 4.1 and all the extracts from standards. Insert instead a sentence saying: “While measurements are core activities in e.g. ISO/IEC 17025 and ISO 15189, the guidance in this document is applicable to other conformity assessment bodies operating according to ISO/IEC 17020, ISO/IEC 17043, ISO/IEC 17065, ISO 9001, ISO 10012, ISO 17034 and ISO 22870.”	Accepted as follows: All extracts from the standards were deleted to avoid many OIML D 10 revisions in the case the standards will be changed. The extracts from international standards were used to show that many standards refer to recalibrations - including ISO/IEC 17025 and ISO 15189, and not only to ISO/IEC 17020, ISO/IEC 17043, ISO/IEC 17065 etc. Therefore 2 nd sentence was deleted and replaced by the text:

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							<i>“Various international standards dealing with measurement activities take this aspect into account, e.g. ISO/IEC 17025 or ISO 15189. In addition, this aspect is also included in international standards applicable to conformity assessment bodies and other parties operating according to e.g. ISO/IEC 17020, ISO/IEC 17043, ISO/IEC 17065, ISO 9001, ISO 10012, ISO 17034 or ISO 22870.”</i>
0022 ILAC	1	4.1 and 5.1		te	Addition of a new factor	- Legal requirements	Not accepted. This comment is not clear as point 4.1 does not include the factors and point 5.1 already includes the “legal requirements” (see last dash in 5.1).
0023 AU	1	4.2	2 nd dashed point	ge	While the calibration of the measuring equipment is a significant component of the stated least uncertainty that can be achieved in the use of the equipment, other components of uncertainty also play a part (e.g. environmental influences and methodology).	Reword the point as follows: “to support the validation of the stated least uncertainty...”	Accepted
0024 ILAC	1	4.3		ed	List does not include legal requirements	Include legal requirements in the list	Accepted
0025 AU	1	4.3	5 th dashed point	ge	We agree with rephrasing in terms of risk assessment. However the risk assessment may not necessarily be based upon a worst case scenario that the equipment is out of calibration, the assessment may require a more frequent re-calibration to maintain a required stated least uncertainty.	Suggest rephrasing as: “risk assessment analysis regarding the consequences of instrumental drift;”	Partially accepted. We agree that the risk assessment may not necessarily be based only upon a worst case scenario. Therefore we reworded this point as follows (to add more examples):

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							<p><i>“risk assessment analysis, e.g. regarding the consequences in the case of incorrect determining of the recalibration interval, measuring equipment is out of calibration (it is not traceable anymore) or significant drift of the measuring equipment;”</i></p> <p>See also comment 0026 ILAC.</p>
0026 ILAC	1	4.3 and 5.1		ge	It seems that all listed in 4.3 should be considered in 5.1. At times, the two lists use different wording to cover the same topic to consider. This may be problematic for the reader.	Suggest having one list and provide this list in 5.1. Ensure that wording of similar elements is the same.	<p>Accepted.</p> <p>Only one list was created and provided in 5.1.</p> <p>The last sentence of clause 4.3 was rewording as follows: <i>“For the most important factors see clause 5.1 of this document.”</i></p>
0027 ILAC	1	4.3,	3 bullet from below	Te	Incomplete text	– frequency, quality and results of intermediate checks	<p>Accepted.</p> <p>See also comment 0026 ILAC.</p>
0028 ILAC	1	4.4		ed	This paragraph is redundant to 4.3 which is just about “when to do it” The reference to appropriate CMC's are redundant to the generic requirements for selecting competent and suitable providers of services in ISO/IEC 17025.	Delete clause completely	<p>Partially accepted.</p> <p>OIML D 10 is intended to be used not only for laboratories acting according to ISO/IEC 17025, but also for other parties (see “Scope” of the guide). To prescribe best practice for calibration results acceptance, the article 4.4 was rewording as follows:</p>

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							<p>4.4 The calibration records may be used for determination of the recalibration interval, when the calibrations are performed, but not limited, at following conditions:</p> <p>—Calibration and measurement capabilities are provided by national metrology institutes and designated institutes that have been subject to suitable peer-review processes. Such peer-review is conducted under the CIPM MRA (International Committee for Weights and Measures Mutual Recognition Arrangement).</p> <p>— Calibration and measurement capabilities are provided by the laboratories that have been accredited by an accreditation body subject to the ILAC (International Laboratory Accreditation Cooperation) Arrangement or to Regional Arrangements recognized by ILAC have demonstrated metrological traceability.</p>
0029 DE	1	4.5		Ed	We propose to reword the paragraph to make it easier to understand.	Replace “Although the cost of calibration cannot normally be ignored in determining the recalibration intervals, the increased measurement uncertainties or a higher risk in terms of measurement quality and services arising from longer intervals may mitigate against the apparently high cost of a calibration.” by	Accepted.

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						<p>“When determining the recalibration intervals, the costs of recalibrations can normally not be ignored. However, these costs need to be balanced against increased measurement uncertainties or a higher risk in terms of measurement quality and services which arise from longer recalibration intervals.”</p>	
0030 JP4	1	4.5	All	Ed	This clause is not clear although it exists in the present D 10.	<p>We recommend rephrasing this clause as shown below, for example.</p> <p><i>The cost of calibration cannot normally be ignored in determining the recalibration intervals. <u>However, a reduction of the cost may lead a longer calibration interval with an increased measurement uncertainty. Such a degrade in the calibration scheme decreases the measurement quality and finally risks the credibility of the testing laboratory.</u></i></p>	<p>Accepted.</p> <p>This clause was rewording. See comment 0029 DE.</p>
0031 ILAC	1	4.6		ed	First sentence is redundant to the next sentence and slightly tendentious.	Recommend deleting as the guidance document presents multiple paths for setting the interval of recalibration most of which are not a complex mathematical and statistical process.	Accepted
0032 DE	1	4.7		Ed	We propose to reword the paragraph to make it easier to understand and to avoid misunderstandings. The first sentence should be deleted as this is described in detail in chapter 5.	<p>Replace “The methods can be used for the initial selection of recalibration intervals and the readjustment of these intervals on the basis of calibration trend and experience. Testing laboratory-developed methods or methods adopted by the testing laboratory may also be used if they are appropriate and if they are validated.” by</p> <p>“Methods for determining recalibration intervals developed by a testing laboratory or adopted by the testing laboratory may also be used if they are appropriate and validated.”</p>	Accepted
0033 DE	1	4.10		Ed	To be consistent “laboratory” should be replaced by “testing laboratory” in this paragraph.	<p>Replace “The laboratory should...” by “The testing laboratory should...”</p>	Already not relevant. See comment 0006 ILAC.
0034 JP5	1	5.1	2 nd and 8 th items	Ed	Regarding the factors for deciding initial recalibration interval, the 2 nd and 8 th items are not clear.	We recommend rephrasing these items as shown below, for example.	<p>Accepted</p> <p>First suggestion was incorporated in the text.</p>

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						<p>- <u>manufacturer's recommendation regarding the measuring equipment</u> (e.g., <u>suggestions from the manufacturer when the uncertainty of measurement is required or declared by the testing laboratory based on the accuracy of instrument</u>);</p> <p>.....</p> <p>- <u>risk assessment analysis in relation to the consequences when the recalibration interval is determined incorrectly.</u></p>	Second suggestion was rewording in line with comment 0025 AU.
0035 ILAC	1	5.2		Ed	Refer to relevant competence in stead	<p>Replace</p> <p>“with general experience of measurements, or knowledge of the particular measuring equipment to be calibrated, and preferably also with knowledge of the intervals used by other laboratories.”</p> <p>To be</p> <p>“having the relevant technical competence.”</p>	Accepted
0036 JP6	1	5.2	2 nd sentence	Te/Ed	Make a correction following our comment JP1.	Replace “measuring instrument” with “measuring equipment”.	Accepted
0037 AU	1	5.2	Last sentence	ed	The last sentence of the clause requires rewording for consistency.	<p>Reword as follows:</p> <p>“An estimate should be made for each measuring equipment or group of measuring equipment as to the length of time the measuring instrument equipment is likely to remain within set limits (i.e. maximum permissible error, accuracy requirements) after calibration.”</p> <p>Or it could be simplified as follows:</p> <p>“An estimate should be made for each measuring equipment or group of measuring equipment as to the length of time the measuring instrument equipment is likely to remain within set limits (i.e. maximum permissible error, accuracy requirements) after calibration.”</p>	<p>Accepted</p> <p>First suggestion was accepted.</p>

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0038 JP7	1	6.1.1, 6.2.2, 6.3.2 and 6.7.2	NA	Ed	Similar expressions using a word “balance” are used in this document. However, their meanings except for 6.1.1 are not clear. We understand that “balance” means “balance between risks and costs”.	Propose amendments by adding “between risks and costs”. They are given in respective clauses, 6.2.2, 6.3.2 and 6.7.2.	Accepted The amendment “between risks and costs” was added in clause 6.2.2. See also comment 0045 JP10. The text in clause 6.3.2 was reworded as follows: “... <i>difficult to achieve the <u>balanced workload between risks and costs</u></i> . See also comment 0049 JP13. The text in the table in the clause 6.7.2, first column, fourth line, was reworded as follows: “ <i>Work-load balanced <u>between risks and costs</u></i> ” See also comment 0063 JP21.
0039 ILAC	1	6.1.2		ed	Bullet two use of i.e	Revise to e.g.	Accepted
0040 AU	1	6.1.3		ed	We would suggest amending the current wording to clarifying what beginning is being referred to.	Suggest rewording as either: “It is recommended for new measuring equipment to be calibrated more frequently in the beginning , so as to establish behavioural trends. After analysis of the behavioural trends the periodicities of recalibration intervals may be re-evaluated.” OR	Accepted The second suggestion was taking account. See also comments 0041 ILAC and 0042 JP8.

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						“It is recommended for new measuring equipment to be calibrated more frequently in the beginning of its operational lifetime , so as to establish behavioural trends. After analysis of the behavioural trends the periodicities of recalibration intervals may be re-evaluated.”	
0041 ILAC	1	6.1.3		ed	Correct grammar	Second sentence, insert word “of”. After analysis of the behavioural trends....	Accepted See also comments 0041 ILAC and 0042 JP8.
0042 JP8	1	6.1.3	All	Ed	This clause is not clear. We recommend not to use “behavioural” and “periodicities” for non-native speakers of English.	We recommend rephrasing this clause as shown below, for example. <i>It is recommended for new measuring equipment to be calibrated more frequently at the beginning to <u>know a trend of change in its characteristics</u>. After <u>this</u> analysis, the recalibration intervals may be re-evaluated.</i> <i>Note: It is recommended in <u>the analysis</u> to collect calibration data at least from three successive <u>periodical</u> calibrations to establish <u>the</u> trend.</i>	Accepted Clause 6.1.3 was rewording as follows (see also comments 0040 AU and 0041 ILAC): “It is recommended for new measuring equipment to be calibrated more frequently at the beginning of its operational lifetime to know a trend of change in its characteristics. After analysis of this trend, the recalibration intervals may be re-evaluated.” For clear understanding of the note, the note was reworded with small change as follows: “It is recommended for new measuring equipment to collect calibration data at least from three successive periodical calibrations to establish the trend.”
0043 DE	1	6.2.1		Te	We do not agree to give an example of percentage values to decide whether an interval may be extended or not. The definition of limits by a testing laboratory depends on too many variables and may differ significantly from the example values.	Delete “(e.g. the subsequent recalibration interval may be extended or unchanged if it is found to be within 80 % of the maximum permissible error that is required for measurement, or reduced if it is found to be outside 80 % of the maximum permissible error)”	Accepted See also comment 0044 JP9

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Country Code ¹	Part	Clause/ Subclause	Paragraph/ Figure/Table	Type of comment ²	Comments	Proposed change	Convener's responses
0044 JP9	1	6.2.1	Almost all	Ed	<p>Some parts of this clause are not clear and redundant. We also propose reinserting “typical” to the 2nd sentence because it is difficult to decide an appropriate percentage for each case of all possible measurements. In the note, “RP-1” should be referred using the name of the practice.</p>	<p>We recommend rephrasing the 1st and 2nd sentences as shown below, for example.</p> <p><i>Each time a measuring equipment is calibrated on a routine basis, the subsequent recalibration interval is extended (or unchanged) if <u>the deviation from the reference value</u> is found to be within an appropriately-defined percentage of the <u>range between the maximum permissible errors (MPEs)</u>. Otherwise, the interval is reduced when the deviation is outside this percentage. The MPEs may be replaced with any other set of limits as required. It is recommended to decide the parentage for <u>typical individual cases</u> (e.g., 80 % of the range of MPEs).</i></p> <p>We recommend rephrasing the 4th sentence as shown below, for example.</p> <p><i>When <u>the records of calibration</u> are maintained and utilised, <u>future troubles</u> with a group of measuring equipment will be predicted because the records <u>indicate needs</u> for technical modifications or preventive maintenance.</i></p> <p>We recommend rephrasing the note as shown below, for example.</p> <p><i>Note: <u>NCSL Recommended Practice RP-1</u> [9] describes the similar Simple Response Method (Method A1). Although <u>this method</u> is inexpensive to implement, random <u>measurement results</u> (<u>with</u> errors falling within or outside the set limits) <u>essentially</u> drive the <u>calibration interval</u> to change, thus <u>the user must compromise the results</u>. As other problems, the <u>calibration interval</u> approaches the correct interval slowly and the correct interval <u>may not be maintained even after it has been achieved</u>. A similar point of view may therefore also apply to Method 1 herein.</i></p>	<p>Accepted</p> <p>The 1st and 2nd sentence was rewording as follows:</p> <p><i>“Each time a measuring equipment is calibrated on a routine basis, the subsequent recalibration interval is extended (or unchanged) if the deviation from the reference value is found to be within an <u>appropriately defined</u> percentage of the range between the maximum permissible errors (MPEs). Otherwise, the <u>recalibration interval</u> is reduced when the deviation from the reference value is outside this percentage of the range. The MPEs may be replaced with any other set of limits as required. It is recommended <u>that appropriate decision criteria for extension or reduction of the recalibration interval of measuring equipment are specified</u> for typical individual cases.”</i></p> <p>The 4th sentence was rewording as follows:</p> <p><i>“When the records of calibration are maintained and utilised, future troubles with a group of measuring equipment will be predicted because the records indicate needs for technical modifications or preventive maintenance.”</i></p>

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						<p><i>Note: <u>NCSL Recommended Practice RP-1</u> [9] describes the similar Simple Response Method (Method A1). Although <u>this method is</u> inexpensive to implement, random <u>measurement results</u> (<u>with errors falling within or outside the set limits</u>) <u>essentially</u> drive the <u>calibration interval to change</u>, thus <u>the user must compromise the results</u>. <u>As</u> other problems, the <u>calibration interval approaches the correct interval slowly and the correct interval may not be maintained even after it has been achieved</u>. A similar point of view may therefore also apply to Method 1 herein.</i></p>	<p>The Note was rewording as follows:</p> <p>“NCSL Recommended Practice RP-1 [9] describes the similar Simple Response Method (Method A1). Although this method is inexpensive to implement, random measurement results (with errors falling within or outside the set limits) essentially drive the calibration interval to change, thus the user <u>shall</u> compromise the results. As other problems, the calibration interval approaches the correct interval slowly and the correct interval may not be maintained even after it has been achieved. A similar point of view may therefore also apply to Method 1 herein.”</p>
0045 JP10	1	6.2.2	All	Ed	Following our comment JP7, change the expression.	<p>Change the expression as follows.</p> <p><i>... it is difficult to keep the calibration workload smooth and balanced <u>between risks and costs</u>, and that</i></p> <p>...</p>	Accepted
0046 JP11	1	6.2.3	All	Ed	This clause is not clear although it exists in the present D 10.	<p>We recommend rephrasing this clause as shown below, for example.</p>	<p>Accepted</p> <p>The clause 6.2.3 was reworded as suggested.</p>

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						6.2.3 It would be inappropriate to <u>set an extremely long or short recalibration interval using this method. Such a case may lead</u> risks associated with withdrawing large numbers of certificates issued, or repeating a lot of work, <u>and such risks may ultimately be unacceptable.</u>	
0047 JP12	1	6.3.1	3 rd sentence	Ed	The 3 rd sentence is not clear although it exists in the present D 10.	We recommend rephrasing this sentence as shown below, for example. <i>From these plots, both dispersion of results and the instrumental drift are calculated. <u>The instrumental drift is the mean drift normally over one recalibration interval although several intervals may be taken into calculation for very stable measuring equipment.</u></i>	Accepted The 3 rd sentence of clause 6.3.1 was reworded as suggested.
0048 DE	1	6.3.2		Ed	We propose to delete the 1 st sentence as it seems to give a subjective rating only and does not contain useful information.	Delete the 1 st sentence “This method is difficult to apply (in fact it is very difficult to apply in the case of complex measuring equipment) and can virtually only be used with automatic data processing.”	Accepted
0049 JP13	1	6.3.2	All	Ed	This clause, the 4 th sentence particularly, is not clear.	In the 2 nd sentence, the expression “variability properties” is not clear. In the 3 rd sentence, replace “balanced workload” with “balanced workload <u>between risks and costs</u> ” following our comment JP7. For the 4 th sentence led by “However, a considerable ...”, we cannot propose a revision. In the note, replace “measurand with single value” with “a material measure” using a term defined in 3.6 of VIM.	Accepted The 2 nd sentence was rewording as follows: <i>“Before calculations can commence, <u>considerable knowledge of the variability of measuring equipment characteristics is required.</u>”</i> In the 3 rd sentence, the “balanced workload” was replaced with “balanced workload between risks and costs” The 4 th sentence was rewording as follows:

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							<p><i>The considerable variation of the recalibration intervals from those prescribed is <u>possible</u> without invalidating the calculations <u>by reason</u> that the <u>reliability</u> can be calculated and in theory at least gives the efficient recalibration interval.</i></p> <p>The 2nd sentence of the note was rewording as follows:</p> <p><i>“This method is suitable for a <u>material measure with single assigned quantity value</u>, e.g. calibration of <u>gauge block</u> or standard resistance.”</i></p>
0050 DE	1	6.4.1		Ed	We propose to add “calendar time” to make the difference clearer.	Replace “...expressed in hours of use, rather than in months.” by “...expressed in hours of use, rather than in calendar time, e.g. months.”	Accepted
0051 JP14	1	6.4.1	All	Ed	<p>The 1st and 2nd sentences are not clear. We understand that the method 2 (6.3) uses an elapsed time from the previous calibration and the method 3 (6.4) uses the total time of <u>practical use</u> of the device.</p> <p>In the 3rd sentence, “device” should be replaced with “measuring instrument” because 4th sentence shows examples using the latter term.</p>	<p>We recommend rephrasing the 1st and 2nd sentences as shown below, for example.</p> <p><i>This is a variant of the method 2. The basic method is <u>the same</u>, but the recalibration interval is expressed in hours of use, rather than <u>an elapsed time</u>.</i></p> <p>In the 3rd sentence, replace “device” with “measuring instrument”.</p>	<p>Partially accepted.</p> <p>The method 3 is variant the method 1 and 2 (calendar – time), therefore the 1st sentence is not rephrased.</p> <p>The 2nd sentence is rephrased as follows (see also 0050 DE):</p> <p><i>“The basic method remains unchanged but the recalibration interval is expressed in hours of use, rather than in calendar time, e.g. months.”</i></p>

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							<p>The 3rd sentence was rephrased as follows (to have a uniform terminology):</p> <p><i>“<u>Such measuring equipment are for example</u> thermocouples, used at extreme temperatures, dead weight testers for gas pressure <u>or</u> length gauges (i.e. <u>measuring equipment that may be subject to mechanical wear</u>).”</i></p>
0052 JP15	1	6.4.2	2 nd , 3 rd and 4 th items	Ed	<p>These items are not clear. We understand the 2nd item means the equipment which changes easily even if it is stored on the shelf.</p>	<p>We recommend rephrasing these items as shown below, for example.</p> <p>- <i>it should not be used <u>for a measuring equipment that drifts or deteriorates easily</u>:</i></p> <p>- <i>the initial cost <u>is high for providing and installing</u> suitable timers <u>for measuring the elapsed time</u>. Since users may interfere with <u>the installation</u>, <u>additional</u> supervision may be required which will increase <u>the</u> costs;</i></p> <p>- <i>it is even more difficult to achieve a smooth flow of work than <u>the schemes</u> with the <u>methods 1 and 2</u>, since</i> ...</p>	<p>Accepted, as appropriate.</p> <p>The 6.4.2 was rephrased for better understanding as follows:</p> <p>The 1st sentence of the 6.4.2 was removed, rephrased and put as the last sentence in 6.4.1</p> <p><i>“Other advantage of this method is that there is the automatic check on measuring equipment utilization.”</i></p> <p>The 2nd sentence of the 6.4.2 (now as the 1st sentence in the 6.4.2) was rephrased as follows:</p> <p><i>“Nevertheless, this method has also following practical disadvantages:”</i></p> <p>The 1st item in 6.4.2 was rephrased as follows:</p>

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							<p><i>“- it is not suitable for measuring equipment containing passive measuring instrument (e.g. attenuators) or standards (e.g. resistance, capacitance);”</i></p> <p>The 2st item in 6.4.2 was rephrased as follows: <i>“-it is not suitable for measuring equipment known to have a drift or deteriorate when it is not in use (e.g. it is on the shelf) or when it is handled or subjected to a number of short on-off cycles;”</i></p> <p>The 3rd item in 6.4.2 was rephrased as follows: <i>“-the initial cost is high for providing and installing suitable timers for measuring the elapsed time. Since users may interfere with the installation <u>of timers</u>, additional supervision may be required which will increase the costs;”</i></p> <p>The 4th item in 6.4.2 was rephrased as follows (see also 0053 ILAC):</p>

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							<i>“-the planning of recalibration works is more difficult in comparison with principle of the method 1 and 2 since the testing laboratory has no knowledge of the date on which the recalibration interval will terminate.”</i>
0053 ILAC	1	6.4.2	4 th bullet	Te	The meaning is unclear.	Delete 4 th bullet.	Partially accepted. Instead to delete the 4 th bullet, the bullet was rephrased for better understanding as follows: <i>“-the planning of recalibration works is more difficult in comparison with principle of the method 1 and 2 since the testing laboratory has no knowledge of the date on which the recalibration interval will terminate.”</i>
0054 ILAC	1	6.5.1		ed	Typographical	Change word “quickly” to “quick”	Accepted, but already not relevant. The 1 st sentence was rephrased as is given in the comment 0055 JP16.
0055 JP16	1	6.5.1	1 st sentence and note	Ed	The 1 st sentence is not clear. Regarding the note, make a correction following our comment JP1.	We recommend rephrasing this sentence as shown below, for example. <i>This is a variant of methods 1 and 2. <u>This is particularly suitable when the part, which provides a reference standard for a measuring equipment, is calibrated easily and quickly.</u></i> In the note, replace “measuring instrument” with “measuring equipment”.	Accepted. The 1 st sentence was rephrased as follows: <i>“<u>This method is a variant of methods 1 and 2. It is particularly suitable when the part, which provides a reference standard of the measuring equipment, is calibrated easily and quickly.</u>”</i> The Note was rephrased as follows:

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							<p><u>“Measuring equipment suitable for this method is for example density meters (resonance type), Pt-resistance thermometers (in combination with calendar-time methods), dosimeters (source included) or sound level meters (source included).”</u></p>
0056 ILAC	1	6.5.3		ed	<p>The statement's end part must refer to interval of calibration:</p> <p>6.5.3 ... the original measuring equipment's interval.</p>	<p>Add “of calibration” at the end of 6.5.3.: 6.5.3 ...the original measuring equipment's recalibration interval.</p>	<p>Accepted</p> <p>Following the comment 0057 JP17, the last sentence was rephrased. After rephrasing the sentence was transfer in the 1st sentence of 6.5.1 (for more suitable context) as follows: <u>“This method is a variant of methods 1 and 2 and may prove to be more effective than the method evaluating a recalibration interval of the original measuring equipment.”</u></p>
0057 JP17	1	6.5.3	2 nd and 3 rd sentences	Ed	<p>These sentences are not clear.</p>	<p>In the 2nd sentence, replace “black box interval” with “calibration interval of black box”. Rephrase the last sentence as shown below, for example.</p> <p><u>Method 4 may prove to be more effective than the method evaluating a calibration interval of the original measuring equipment.</u></p>	<p>Accepted</p> <p>In the 2nd sentence “<i>black box interval</i>” was replaced with “<i>recalibration interval of black box</i>”.</p> <p>The last sentence was rephrased. After rephrasing the sentence was transfer in the 1st sentence of 6.5.1 (for more suitable context) as follows:</p>

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							<i>"This method is a variant of methods 1 and 2 and may prove to be more effective than the method evaluating a recalibration interval of the original measuring equipment."</i>
0058 JP18	1	6.6.1	1 st sentence	Ed	"Type" is not necessary.	Delete "type" in the 1 st sentence.	Accepted
0059 JP19	1	6.6.2	All	Ed	Make a correction following our comment JP1. "RP-1" should be referred using the name of the practice.	Replace "measuring instrument" with "measuring equipment". Correct "RP-1" to "NCSL Recommended Practice RP-1".	Accepted
0060 DE	1	6.7.1		Ed	To be consistent "laboratory" should be replaced by "testing laboratory" also in the 2 nd sentence.	Replace "...whether the laboratory intends to..." by "...whether the testing laboratory intends to..."	Accepted, but already not relevant. See comment 0006 ILAC and 0065 ILAC - the applicability of the guide should be not restricted for testing laboratories.
0061 JP20	1	6.7.1	1 st sentence	Ed	The last part of this sentence is not clear.	We recommend rephrasing this sentence as shown below, for example. <i>No one method is ideally suited for the full range of measuring equipment encountered (see Table 1). <u>A testing laboratory may choose to use different methods using different measuring instruments depending on the location of use.</u></i>	Accepted The 1 st sentence was rewording as follows: <i>"No one method is ideally suited for the full range of measuring equipment encountered (see Table 1). <u>The laboratory may choose to use different methods using different measuring equipment depending on the location of use.</u>"</i>
0062 ILAC	1	6.7.2	Table 1	ed	Change bad term by low term in Table 1 for a better coincidence with the others categories. It is not clear the term bad.	Change to "Low" instead of "if bad".	Accepted

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0063 JP21	1	6.7.2	Table 1	Ed	In the column “performance”, two titles “work-load balanced” and “availability of measuring equipment” are not clear. Please also see JP7 for the meaning of “balance”.	We propose following amendments of the titles. <i>Work-load balanced <u>between risks and costs.</u></i> <i><u>Applicability to measuring equipment</u></i>	Partially accepted “ <i>Work-load balanced <u>between risks and costs.</u></i> ” was amended. Term “ <i>Availability of measuring equipment</i> ” was not rephrased. The availability means “accessibility”. Using the term “ <i>Applicability to measuring equipment</i> ” it could have the same meaning as “ <i>Applicability with respect to particular devices</i> ” that is mentioned in the table one line above.
0064 ILAC	1	7		ge	Include the VIM as a reference into the bibliography.	Add the next item: JCGM 200:2012 International vocabulary of metrology – Basic and general concepts and associated terms, 3 rd edition. (this is identical to [1], so maybe the best is to have the different names for the VIM mentioned her (ISO, OIML and JCGM numbers) Also ad ISO/IEC 17000:YYYY.	Accepted The reference to VIM was rephrased as follows: “ <i>OIML V 2-200 VIM, 3rd edition, Edition 2012 (E/F), (Edition 2010 with minor corrections), JCGM 200:2012(E/F)</i> ” The reference to ISO/IEC 17000: 2004 was added.
0065 ILAC	1	1a, 1b, 1c, 2, 4.1, 4.3 2x, 4.7 2x, 4.8, 4.9, 5.1 6.4.1, 6.4.2, 6.5.2, 6.7.1		Ge	Remove limitation to testing labs. All statements for testing laboratories should be changed to “laboratories”	Change “testing laboratories” into “laboratories” or “testing laboratory” into “laboratory” all over the document	Accepted
Convenor SK	1	1	c)	Ed	Better readability	Delete “individual testing” and change “Document” into “document”	The point a) (before point b)) – see also comments 0012 ILAC, was reworded as follows:

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							a) it is the responsibility of each laboratory to choose to implement any or none of the methods described in this document based on
Convenor SK		3		Ed	To add missing references to terms mentioned in the text.	Add following references: measurement uncertainty (VIM, 2.26) laboratory (ISO/IEC 17025: 2017, 3.6) conformity assessment body (ISO/IEC 17000:2004, 2.5) certification body (ISO/IEC 17065:2012, 3.12) inspection body (ISO/IEC 17020:2012, 3.5) reference measurement standard (VIM, 5.6) adjustment of a measuring system (VIM, 3.11) material measure (VIM 3.6)	Accepted
Convenor SK		4.8		Ed	To use correct wording for the term “combined measurement uncertainty” according to terms and definitions.	Replace “combined measurement uncertainty” by the “combined standard measurement uncertainty”	Accepted
Convenor SK		4.9		Ed	There are not uniform references to the standards, some references refer to the clauses.	To use uniform references to the standards. <i>Replace “(see ISO/IEC 17025:2017 [3], 6.4.10 and 7.7.1)” by “(e.g. see ISO/IEC 17025 [3])”</i>	Accepted
Convenor SK		6.1.2		Ed	One list was created in 5.1 - see comment 0026 ILAC. This list is relating to the factors for the initial decision in determining the recalibration interval. Two factors from clause 4.3 – “trend data obtained from previous calibration records” and “recorded history of maintenance and servicing of the measuring instrument” are not appropriate to initial decision. We suggest to transfer them in 6.1.2	Add in the last dash following text “ <i>(e.g. trend data obtained from previous calibration records or recorded history of maintenance and servicing of the measuring instrument);</i> ”	Accepted
Convenor SK (8)		all			The 2 CD was reviewed by BIML for language correction. All changes marked in 2 CD that are not mentioned above follow the language corrections recommended by BIML.		Language corrections

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