California Department of Food and Agriculture

Division of Measurement Standards (DMS)

June 2023 Survey

Registered Service Agency (RSA) Compliance

During routine testing of commercial weighing and measuring devices, county weights and measures officials sometimes interact with RSAs and their employees (Service Agents), who are required to comply with California's laws and regulations (Business and Professions Code, Division 5, Chapter 5.5 and California Code of Regulations, Title 4, Division 9, Chapter 4).

DMS surveyed county officials to learn their opinion of RSA and agent compliance with the state's legal requirements, and also to obtain the counties' perspective on the effectiveness of DMS' current RSA Program.
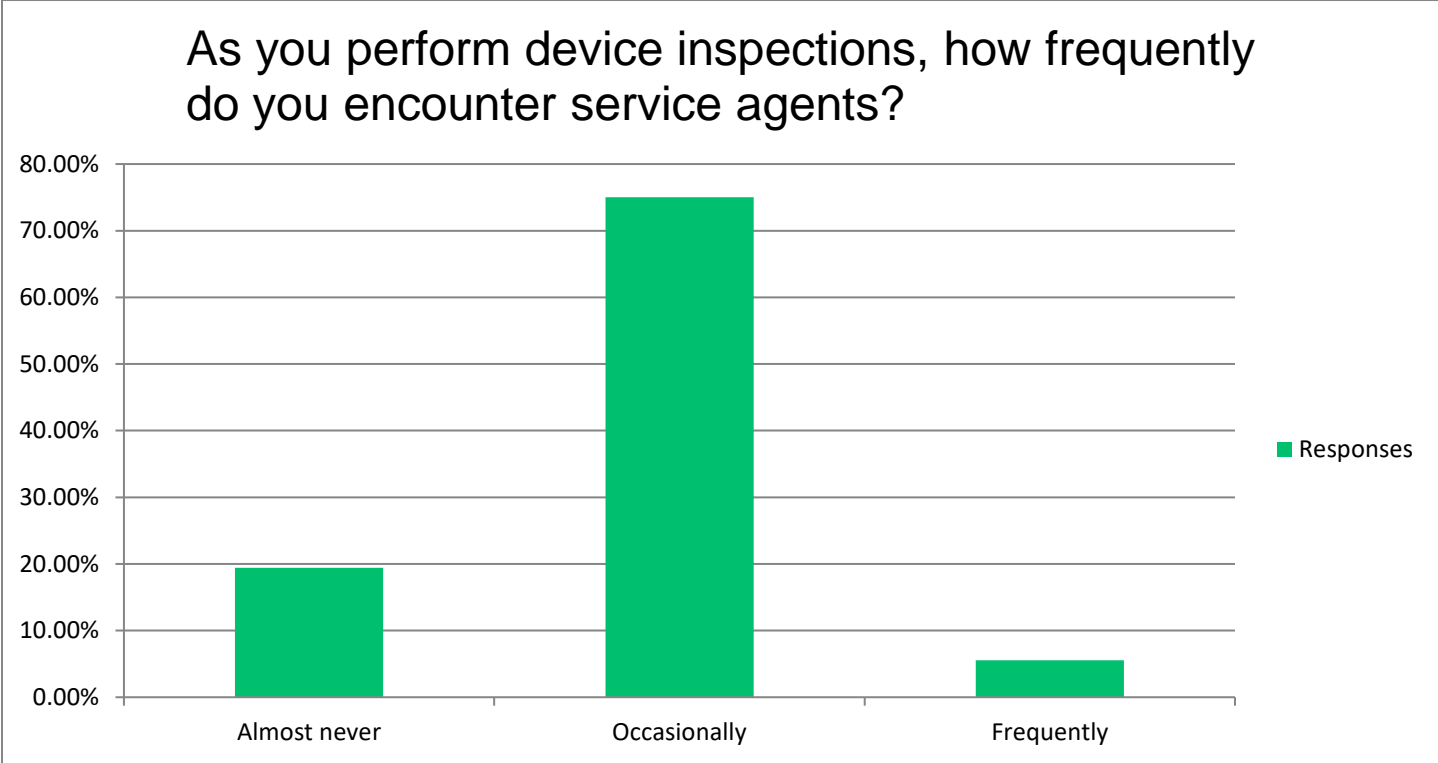
This document contains county responses to the survey. It does not include any DMS conclusions or RSA Advisory Committee recommendations.

Question 1: County participation.

DMS received a 66% response rate. 36 of 55* county jurisdictions responded to the survey.

*There are 58 counties in California. However, six (6) county offices of weights and measures are combined with a neighboring county to perform weights and measures activities (Alpine/El Dorado; Inyo/Mono; and Plumas/Sierra).

Question 2:

As you perform device inspections, how frequently do you encounter service agents?

|	
Almost never	~19.00%
Occasionally	~75.00%
Frequently	~5.50%

Legend: ■ Responses

Question 3:

In the last year, how many service agents have you encountered who are unlicensed (either do not have a license, or have an expired license)?
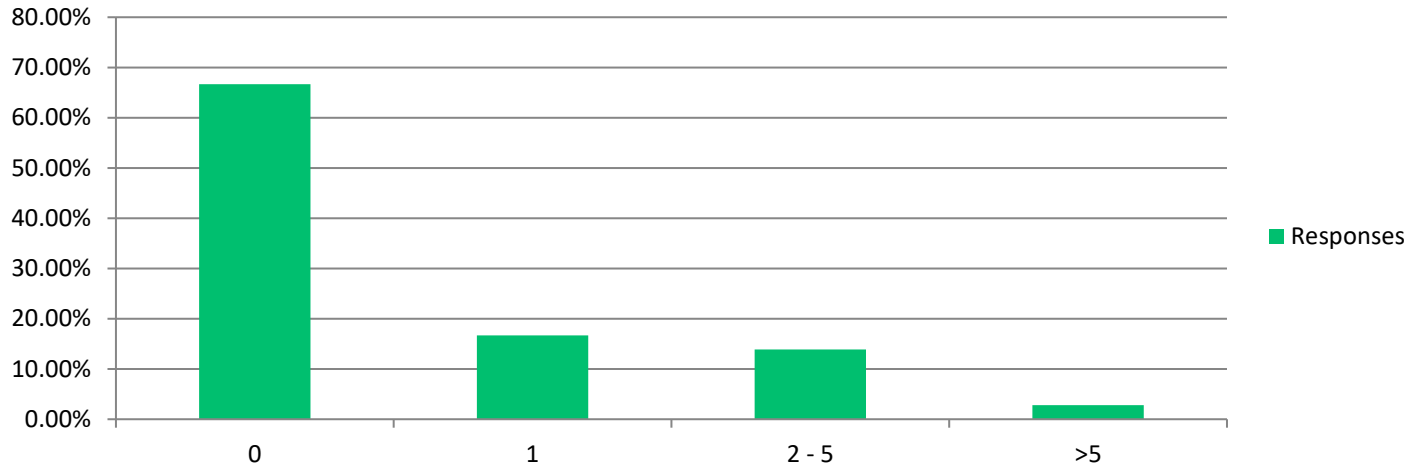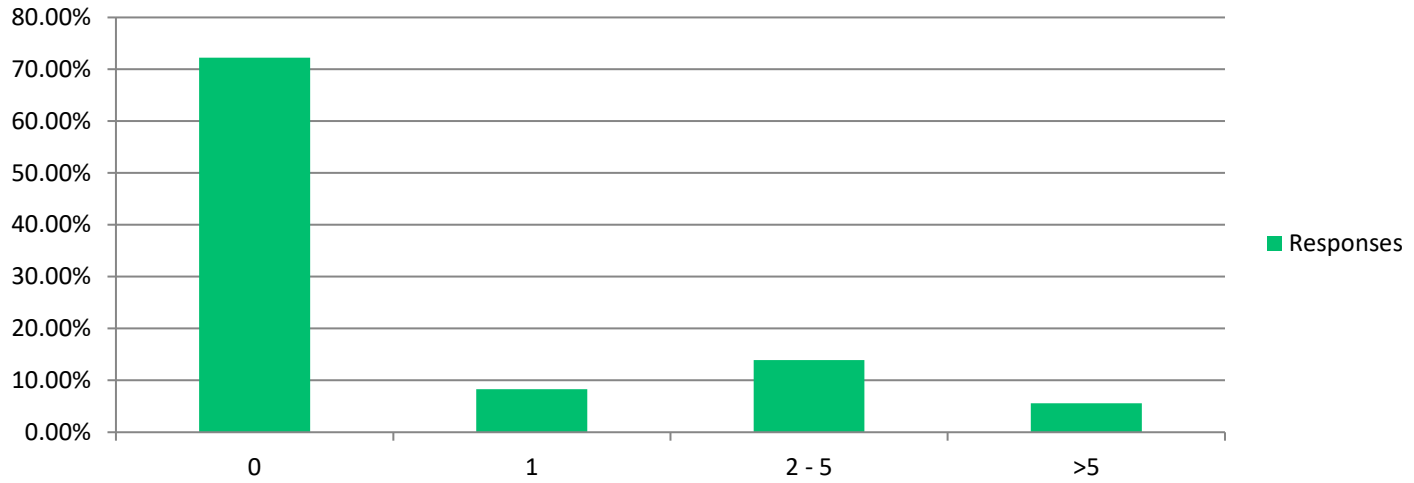
Question 4:

In the last year, how many service agents have you encountered who did not possess or have available for use, certified standards and testing equipment to meet minimum testing requirements as applicable?
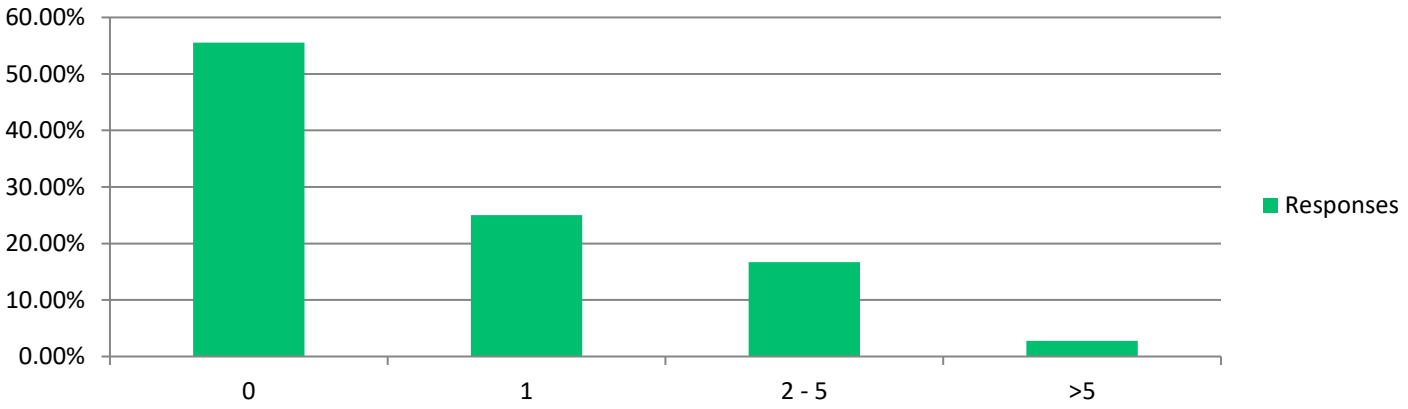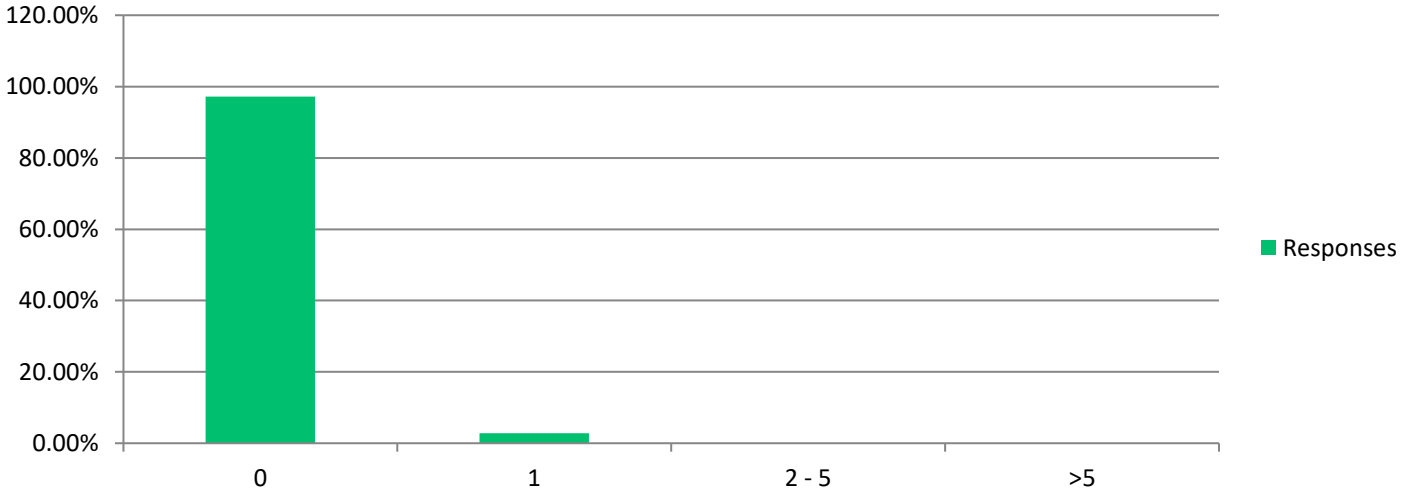
Question 5:

In the last year, how many service agents have you encountered who do not have a current copy of the Field Reference Manual (either electronic or hard copy)?

Question 6:

In the last year, how many service agents have you encountered who are functionally illiterate and/or are unable to effectively communicate in English?

Question 7:

In the last year, and not counting Electric Vehicle Fueling Systems, how many times have you not received a required Placed in Service Report (PISR)?
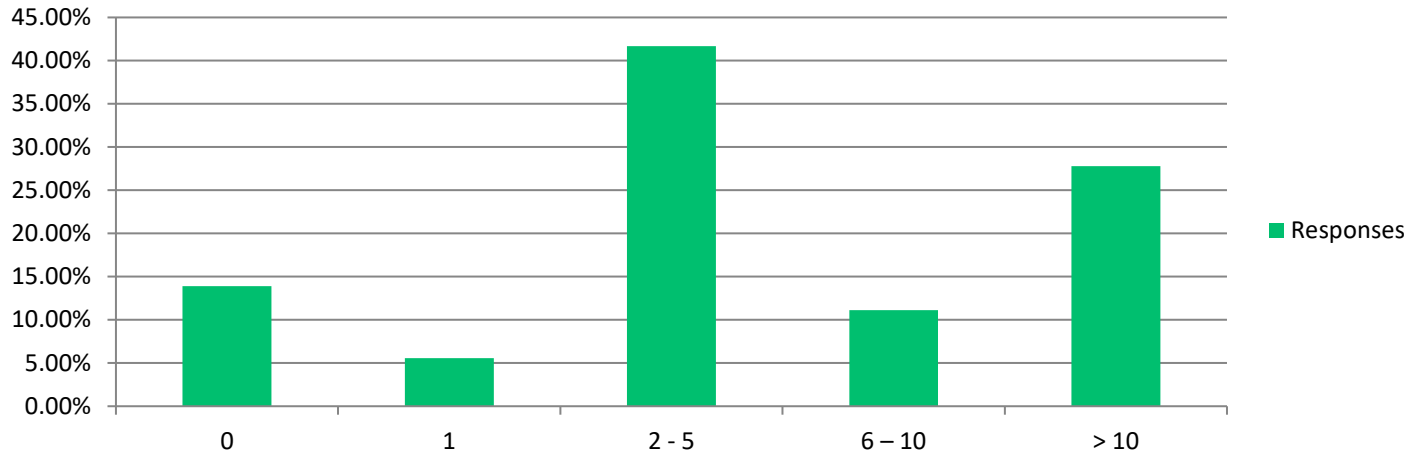
Question 8:

In the last year, how many times have you found a commercial weighing or measuring device installed that is neither NTEP- or CTEP-approved?

Question 9:

In the last year, how many times have you seen a PISR that is either incomplete or incorrect?

| | 0 | 1 | 2 - 5 | 6 – 10 | > 10 |

Responses
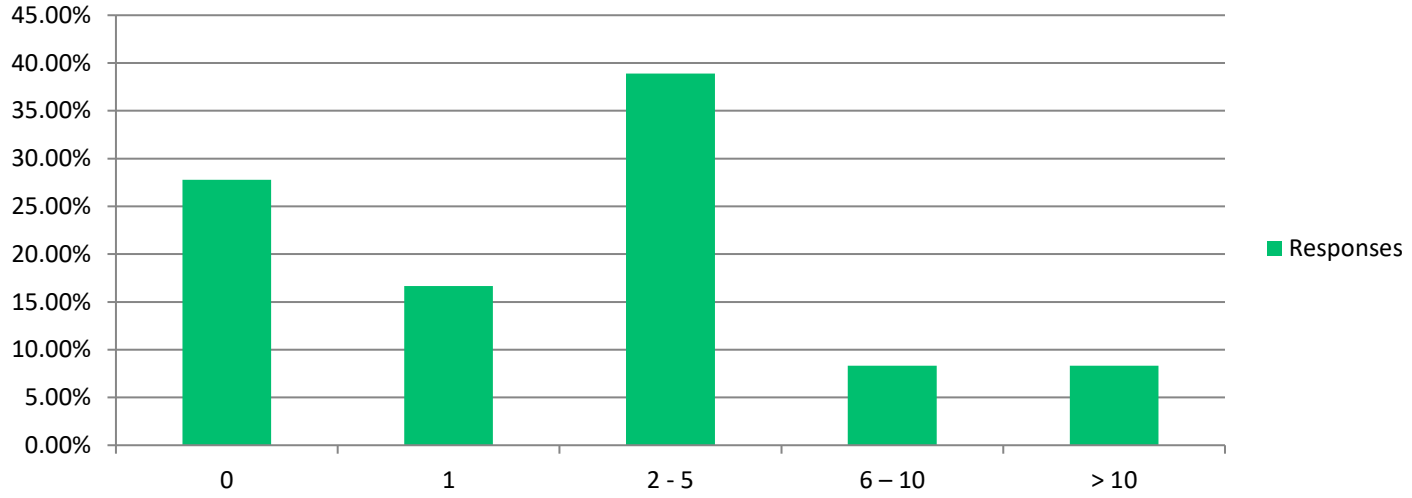
Question 10:

What are the most common omissions or errors you see on a PISR? (Select all that apply.)

Categories (left to right):
- Name and address of RSA
- Location of device(s)
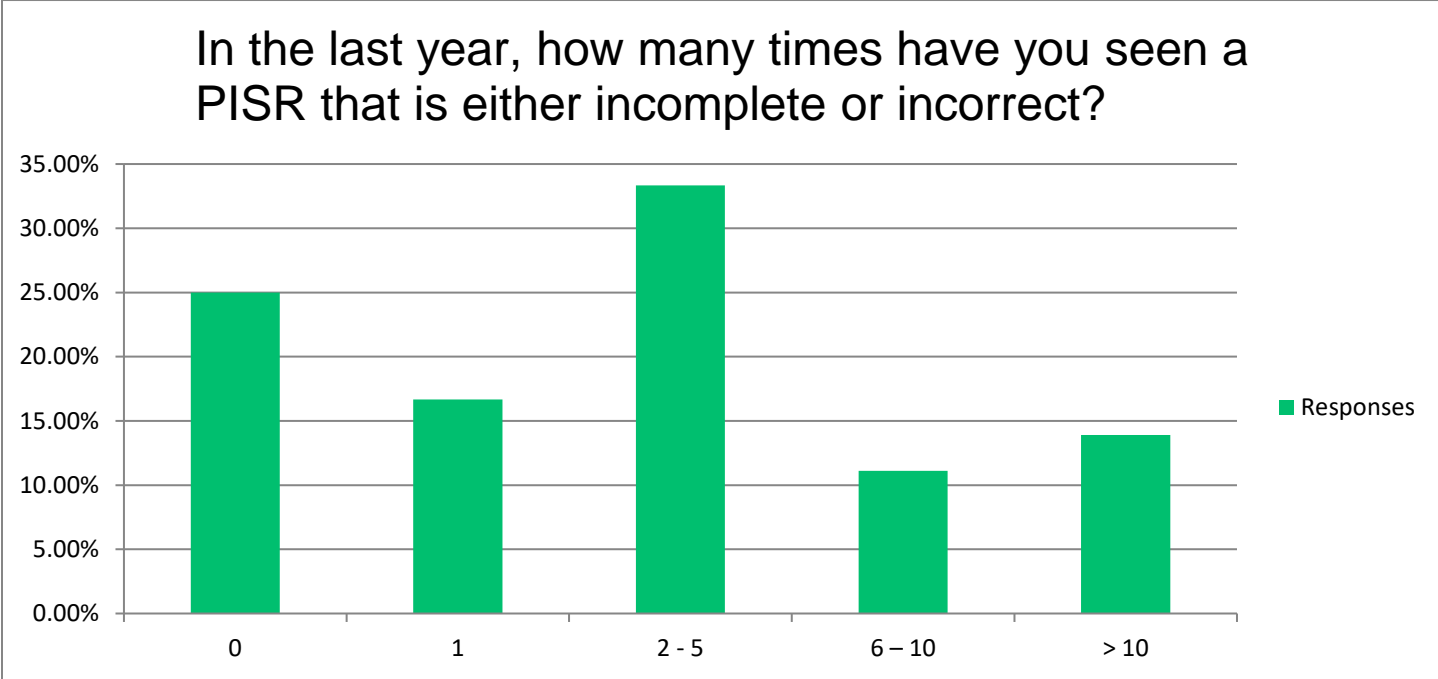- Name of Service Agent
- Date of adjustment, repair, placing, or replacing into service.
- Identification of Service Agency work performed
- Name of device manufacturer(s).
- Model designation(s) and serial number(s) of the device(s).
- On new installations, the NTEP Certificate of Conformance number(s) for each separately approved component or device, if marked on the component or device.
- Security seal on any adjustment mechanism designed to be sealed.

Legend: Responses

Question 11:

In the last year, how many times have you followed up on a PISR to inspect a commercial weighing and measuring device and found the Service Agent has not placed a security seal on any adjustment mechanism designed to be sealed?
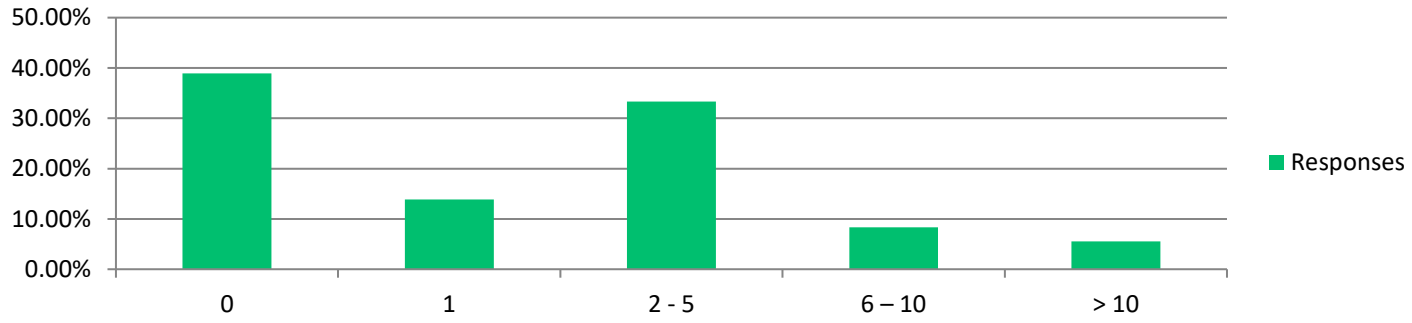
Question 12:

In the last year, how many times have you followed up on a PISR to inspect a commercial weighing and measuring device and found the Service Agent has not properly identified their work on each device by applying an adhesive tag or label in a conspicuous location on the device? (The adhesive tag or label must show the name, registration number and business telephone number of the service agency, the license number of the service agent performing the work, and the date.)

Question 13:

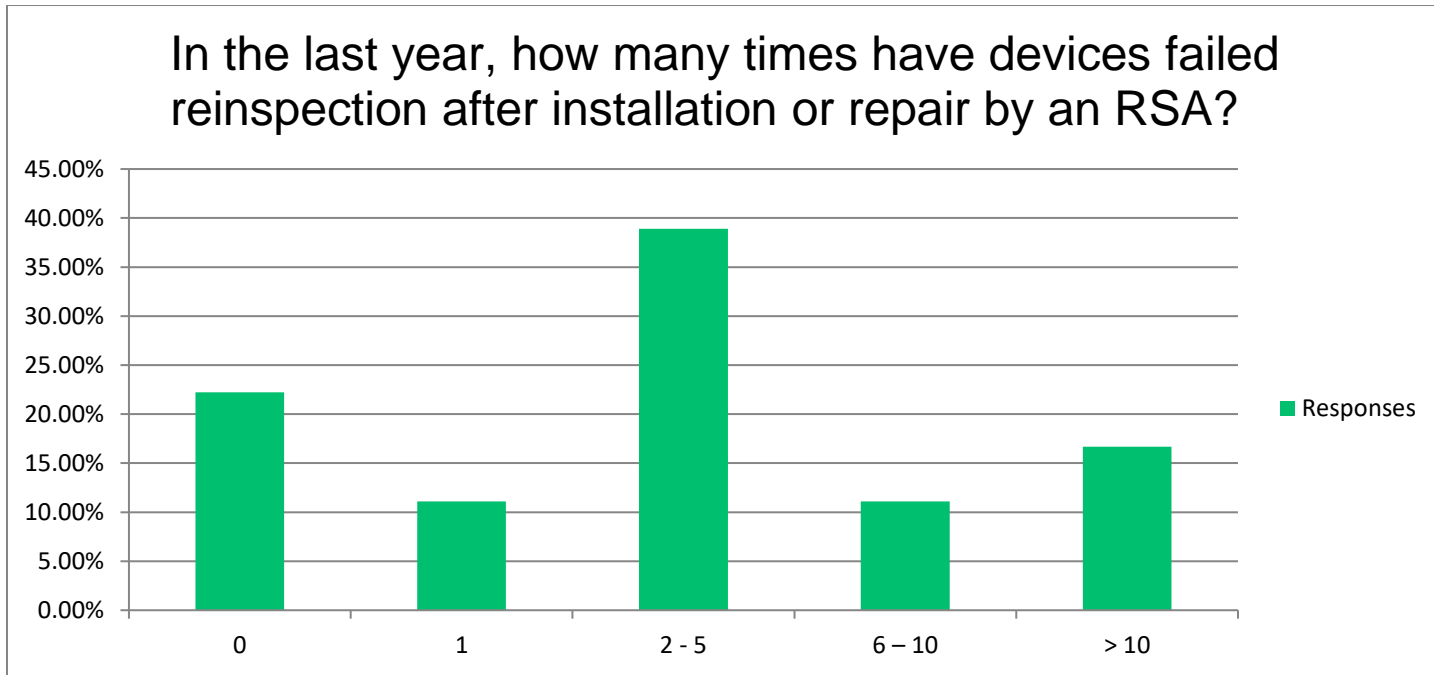## When your county receives a PISR, do you try to:
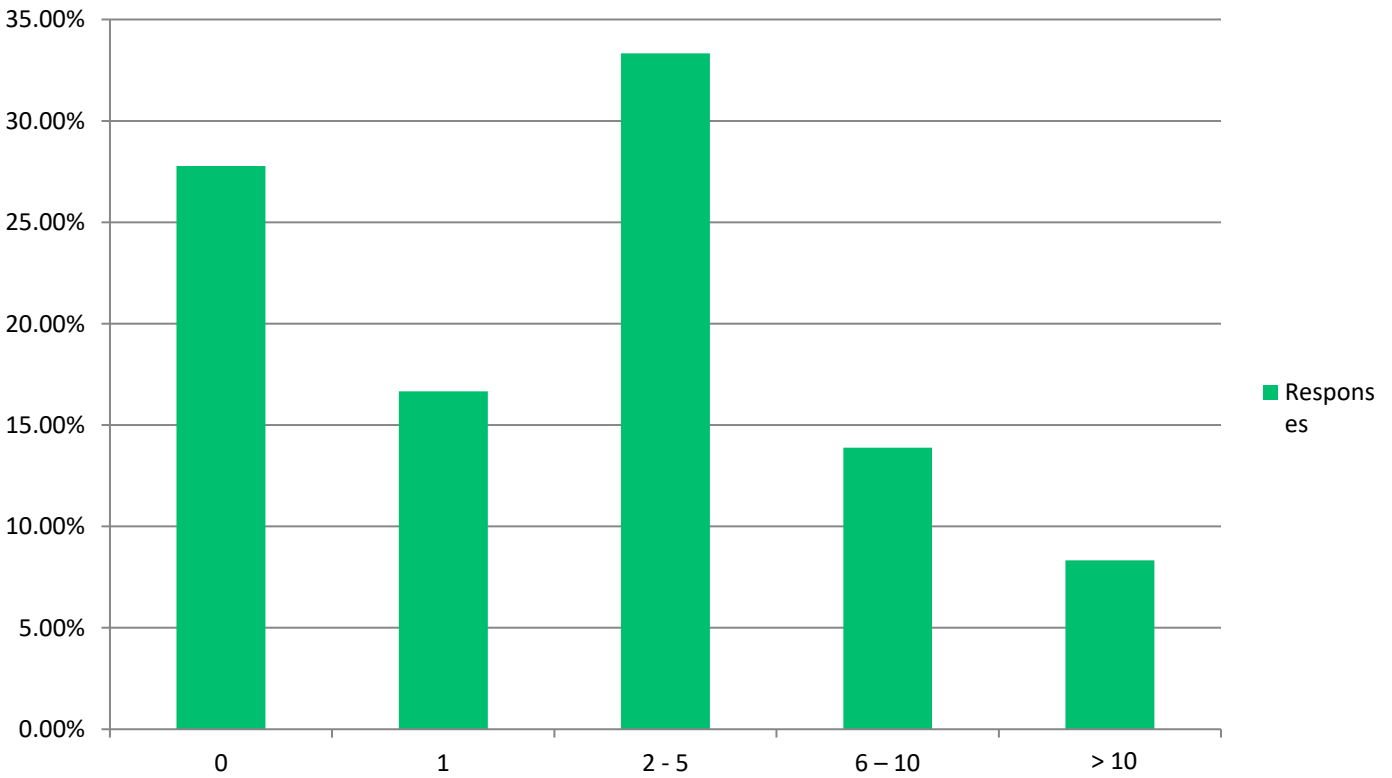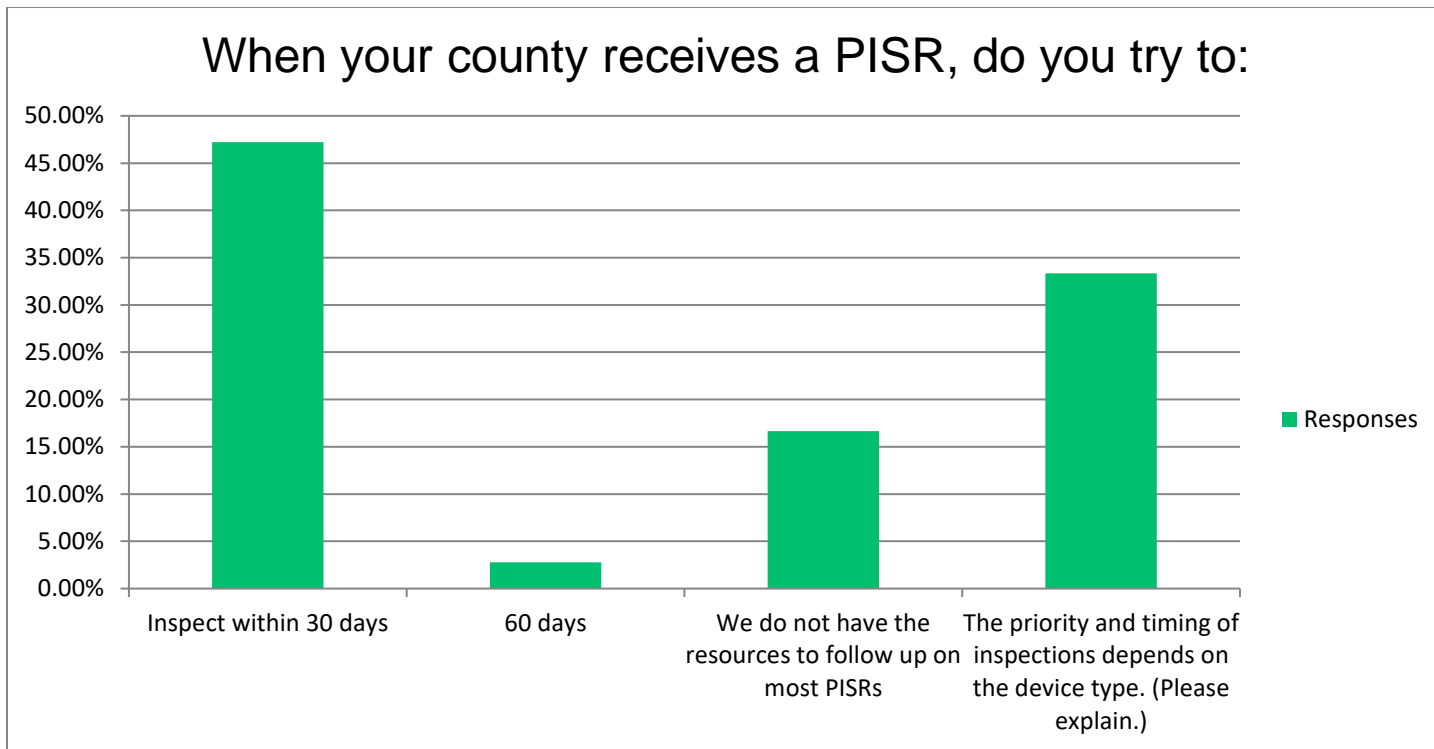
Other responses included:

- Many PISR are for minor repairs (replace nozzle, breakaway, etc) and we do not follow up until device is due for inspection. We place a priority on tagged devices, new businesses, lesser priority routine maintenance.
- We typically do not have the resources to follow up on most PISRs, however, for newly installed devices, we try to follow up within 30 days.
- We do not have the resources to follow up on most PISRs. We do perform reinspections for most vehicle & livestock scales; Taxi meters; and vehicle & wholesale meters that fail initial inspections.
- We can't check every break-away nozzle, but priority for calibration type repairs is more important.
- We do not follow-up on whip hose, nozzle replacements, or filter changes. Placed in Service Reports for scales for grape harvest have priority over weighing and measuring devices during July through September.
- This varies depending on the situation. For example, failures on an initial inspection get more priority than PISRs from regular maintenance.
    - 1. If it is a new device we always check
    - 2. If it is a Red/blue Tagged device we always check
    - 3. If it is an existing device we check it in our next routine inspection
    - 4. Number of device, if it is 1 or 2 we check in our next routine inspection if it is more we will inspect.
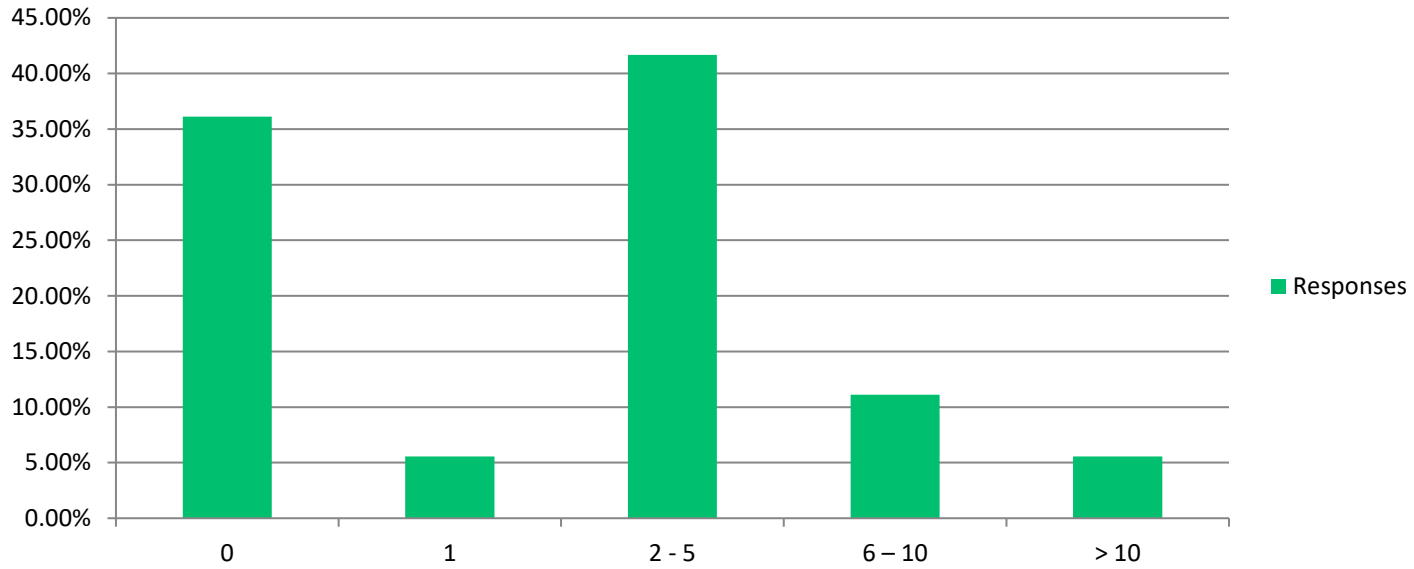
- We make time to follow up on repairs that could influence calibration, new installs or replacements.
- If the device was one that we took exception to during a complaint or annual routine inspection we would do a follow-up within 30 days. Otherwise, we wait and test the device during the annual inspection. If we have already performed the annual inspection then 60 days.
- Depending on the time of year, staff may be limited which delays following up on PISRs within 30 days. For device inspections that only require one Inspector, we try to follow-up on PISR's within 30 days. Both of our licensed staff members have some physical limitations so for gas pumps which require an Ag Aide present to pour heavy provers, inspections may be delayed due to staff availability.
- We base it on whether we are close to returning for the annual inspection and/or if it was reported as a complaint.
- On question #10 we have not experienced any omissions on our PISRs , but the survey required an answer to accept closure.
- We follow up if we can. The device type and service agents play into this. We check up on service agent's work if we have any doubt at all about them.

Question 14:

In the last year, how many times have devices failed reinspection after installation or repair by an RSA?

Legend: Responses
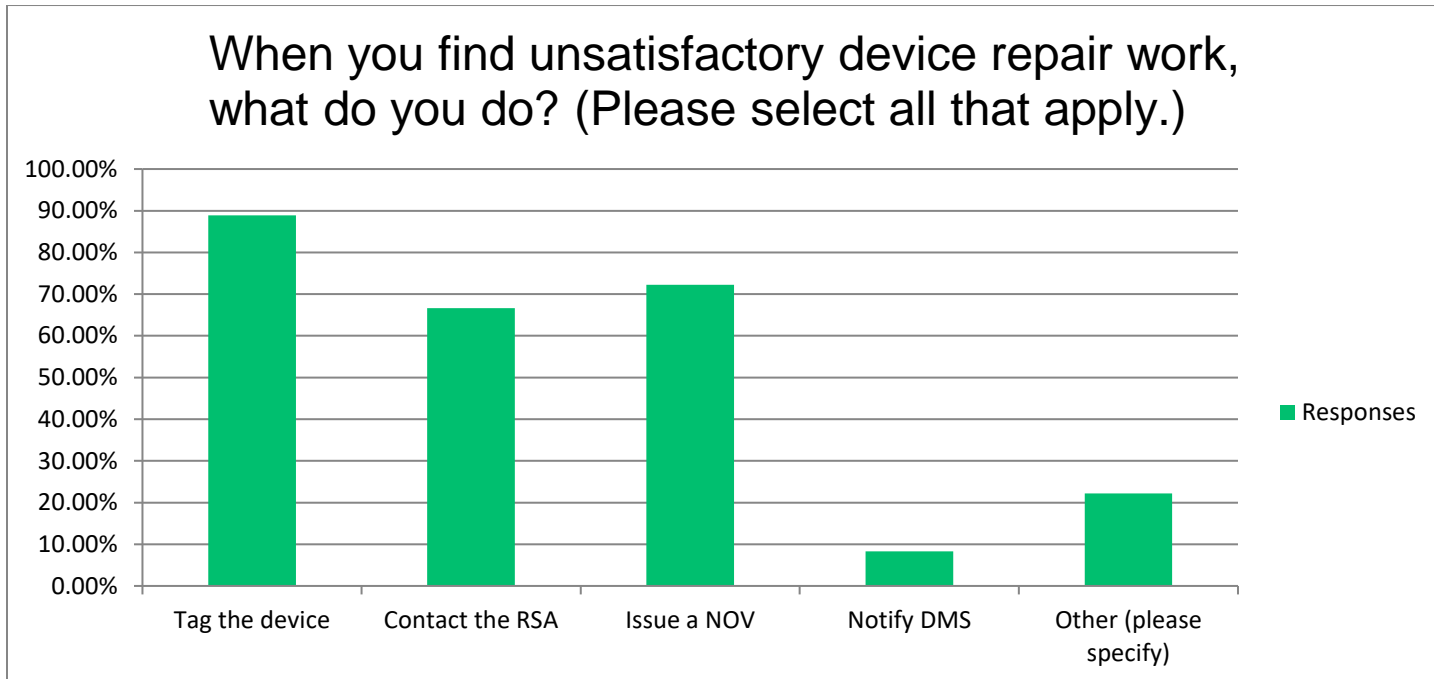
X-axis categories: 0, 1, 2 - 5, 6 – 10, > 10

Question 15:

In the last year, how many times have you found that a service agent has not restored the device to be "correct"? (For this question, "correct" means that in addition to being accurate, the device meets all other requirements like specifications, user requirements, etc.)

Question 16:

When you find unsatisfactory device repair work, what do you do? (Please select all that apply.)

Other responses included:

- DMS is notified to verify RSA status and to check if there are other complaints about the agency's unsatisfactory work. This helps us determine if a higher level of enforcement is applicable.
- Issue NOPAs when applicable for repeat non-compliances.
- The failed device is reported to the device operator. We leave it to them to contact the RSA for re-repair. NOV's are issued in the proceeding days.
- Issue NOV to the specific agent who placed the incorrect device into service.
- Issue Notice of Proposed Action.
- We have not encountered unsatisfactory work, if so we would tag the device.
- issue a civil penalty on second failed attempt or repeated offenses of the same violation.
- N/A for the last year.

Question 17:

In the last year, how many times have you found that the majority of devices at a location have been adjusted so they predominantly favor the device user?

Question 18:

In the last year, how many times have you visited the business location of an RSA?

Question 19:

Chart: "Are you using the DMS RSA Portal?" — Bar chart showing Responses. Yes ≈ 55.00%, No ≈ 44.00%.
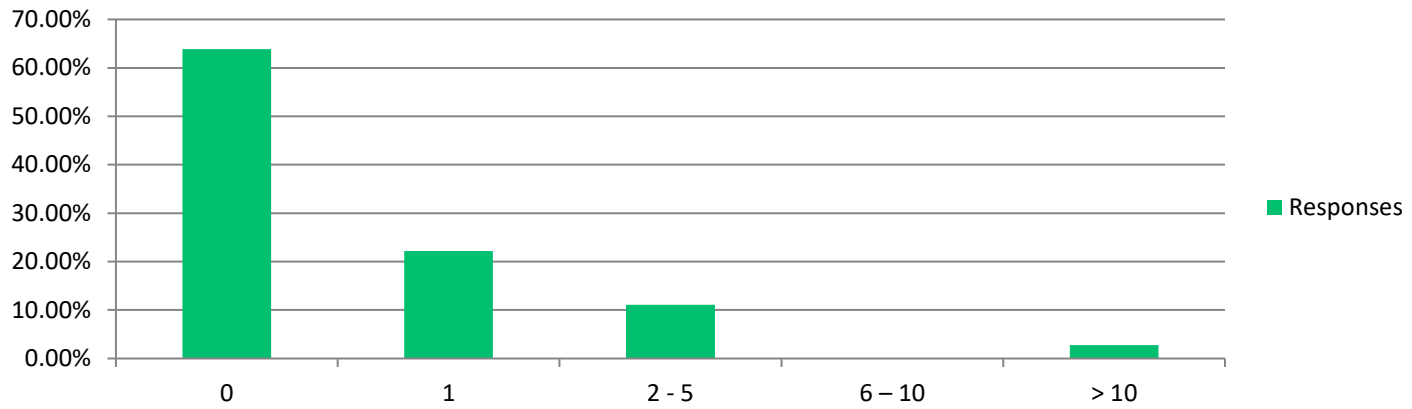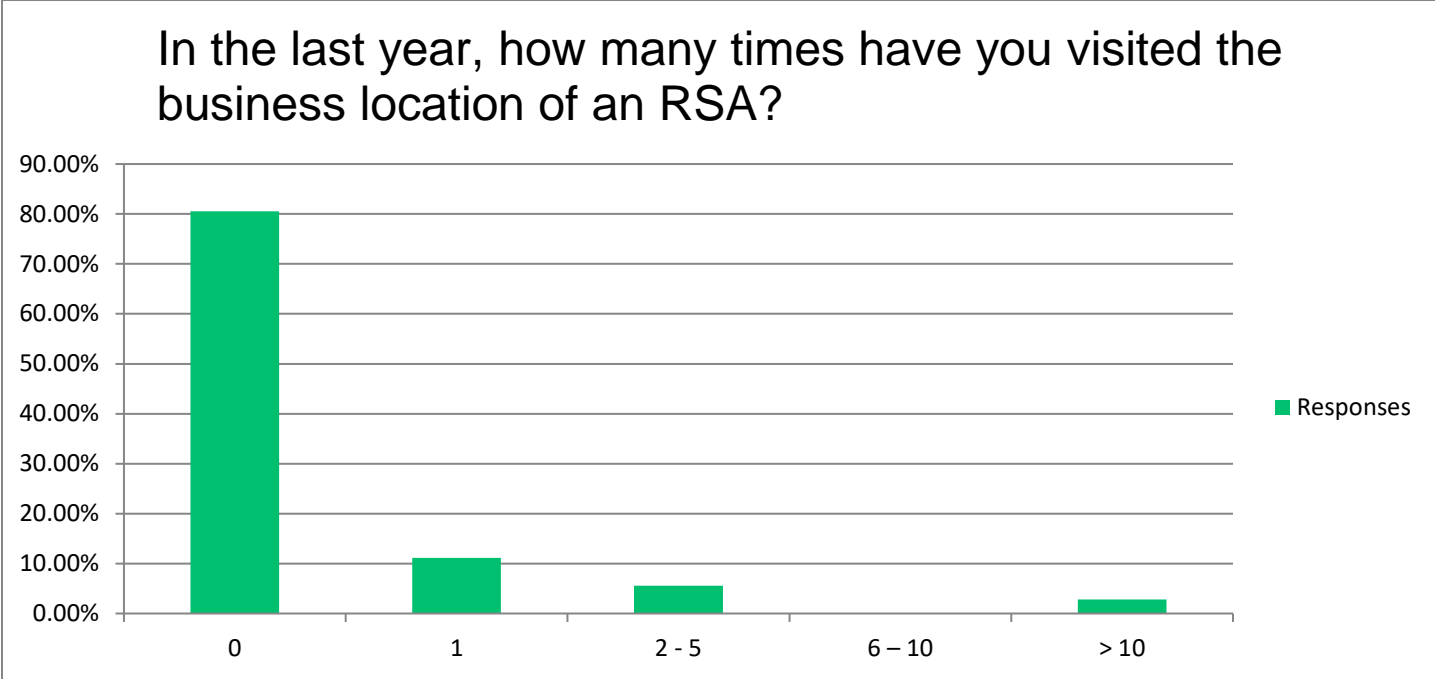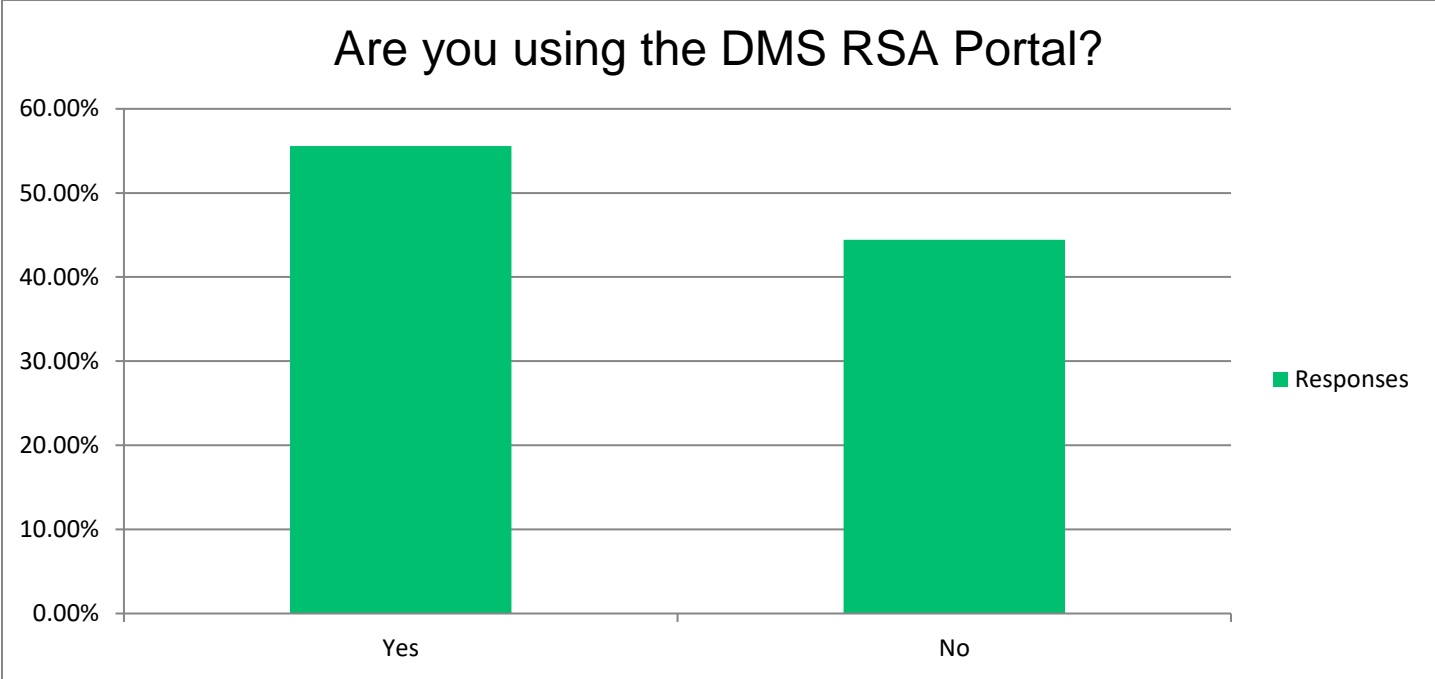
Question 20: Provide any comments regarding the DMS RSA Portal here.

Responses:

- Most inspectors use the old link to the RSA list of agencies and agents as a quick reference, but we contact DMS to ask for specific RSA information.
  We are not using the new DMS RSA Portal because it is not user friendly. It adds extra time to ask the only person in the county to retrieve the information needed. Plus it makes it basically impossible for field staff to verify the status of agent and agency.
- By "using", we have an account and I accessed via desktop computer. Since authenticator app introduced unable to access. I tried via mobile device with what I thought was my password, denied. Requested a password change and received a message instantly that said either 24 hours or something else, regardless I can no longer access.
- A single user per County make it inaccessible to entire staff. Saleforce app required for authentication must be OKed by County IT before it can be downloaded. Please keep RSA Excel lists on DMS website accessible to all.
- RSA portal accessibility is an issue. Currently each county is allowed credentials for 1 user to access the RSA portal. In the past this hasn't been an issue since credentials could be shared amongst the group, however this system has multi-factor authentication which reduces the ability to share credentials.
- Information is displayed in confusing manner. Business licenses may be expired but their account is still active. How do we determine whether they are active. Duo Factor is a bit overboard. Having only one login for the county is a bit challenging. Changing password every 3 months is not very friendly. Duo Factor sent to primary employee so if other employee wants in, they have to communicate with that employee.
- The Chief Deputy Sealer has access to the Portal. He is the only one with a log in & password
- We would like to use the portal but have not received credentials yet.
- The portal can be difficult to navigate, in field access is nonexistent, and not being able to have multiple users limits department access.
- Why do you make it so hard to get into the portal and limit the number of county representatives to one?
- 1. Know and understand the legal responsibilities of an RSA.
  2. Submit complete forms/reports in a timely manner.
  3. 4CCR 4083(g), reduce 5-year extension, i.e., increase required license renewal examination frequency.
- Yes, to verify a single agency is active. It is not easy at all to produce a list of agencies that are registered for a particular device type in order to provide that to a business whose device we just tagged out.
- Providing more users per county would be beneficial.
- The problem is it is accessible only by one person.
- None to report. The RSA Portal contains all the necessary information and is effective.

- Expanded access for inspectors. Current limiting with one person and authenticator app discourages the use in a program that is already under regulated.
- I emailed saying I would be the designated user but never got a response.
- I am the Sealer and I do not have a login
- If RSA's were required to submit PISRs in the portal which automatically get forwarded to the counties, it might help with PISR submittal. We find we don't always get PISRs and wondering if there might be barriers to submitting them that could be removed.
- It is rather difficult to work with, but we are attempting to use as much as possible
- I am currently unable to use the Portal since my login credentials have not been able to be reset successfully by Salesforce IT. I have not had the opportunity to use the portal since it has gone online.
- I plan on familiarizing myself with the new data base.
- Provide training/advertise the portal

Question 21: What are the top three areas where RSAs, in general, should improve their performance?

Responses:

- 1. Have a copy of both BPC and CCR to have a good grasp of what is required of them.
  2. Know how to read and follow NTEP/CTEP CC's and COA's respectively.
  3. Submitting correct PISR and understand why each element on the report is needed.
  4. Understand the difference between (1) Repair, Sale or Loan a device vs. Placing the repaired, sold or loan device into Service, and (2) difference between PIS a device vs a device system. (Example: scanner scale w/ software component or receiving scale w/ indicator)
- 1) Notification, identification, location of devices removed from service in PISRs (replaced with another device) so they can be documented. (Not a requirement in the FSM §4085 (a)(2) but should be)
  2) PISRs to have all required information and additional information to allow sealers to determine where devices are located (address of business is usually not adequate) Requiring PISR to have sufficient information of where the device is located. In submeters identify the unit address, what area in the unit it is installed at, secondary indicators info.
  3) Notifying local WM before using and allowing local WM to inspect meters when water submeters tested by other counties and are being used within county
- Sending Notifications for all placed in service work. There are a few times we have caught it, but it is likely happening more frequently.
- Most submeter service tech's do not have certified standards.
- Always placing a label identifying the business performing the work
- 1. Be a licensed agent associated with a registered agency
  2. Have and use appropriate standards for the job
  3. Complete and submit Placed in Service Report within 24 hours
- 1. Submit complete and timely PISRs.
  2. Ensure all specification requirements are met to ensure PIS devices are correct. Many are just looking at the tolerance.
  3. Understand the CCR and specification requirements. Possess a current CCR copy.
- Submitting timely and thorough PISRs.
  PISRs & Identifying work.
- 1. Ensure device is as close to zero as possible vs. at tolerance
  2. Submit complete placed in service report within 24 hours
  3. Use appropriate standards and a sufficient quantity of test weights
- They need to bring their own sealing pliers. Need to be equipped with the right tools. Need to verify they have the right year for their tools.
- Indicate what was repaired/replaced
- Make sure to apply a physical seal if required.
- Turn in PISR within 24 hours

- 1. 24-hour notification.

  2. Being more thorough with devices. It seems like RSAs will skip some tests (e.g. shift test) when making repairs. When an inspector goes to follow up the device is out for another reason than originally tagged.
- submission of PISR's
- Notifications when devices are placed into service.
- Quality of work can be improved upon.
- Broadening knowledge of devices being worked on and how to repair them.
- Replacing the original tag when device is NOT repairable at the time of service.
- More PIS reports.
- Improve general knowledge of RSA's.
- Improve integrity of work performed.
- Completeness of PIS
- 1.) sending reports

  2.) calibrating devices until they get repeatable results

  3.) correct identification and seals on devices
- 30sec + 10sec drain of a handheld test measure for RMFD. Tag devices after they perform work. Seal the device with a security seal.
- 1. Identifying RSA work on devices.

  2. Notifying Sealers within 24 hours.

  3. Registering as RSAs and having licensed agents.
- 1. Timely reporting of PISR

  2. Properly report the required information for PISR

  3. Installing water meters tested out of county requirements.
- Kings Co. does not encounter many issues with RSA working within the county. Since I have supervised the program, inspectors have not encountered devices not registered with the county.
- The RSA'S that work in my county do a great job and are adhering to all applicable code requirements.
- Sealing physically or electronically
- Calibration used to repair or condition (all devices)
- Sale of non-suitability scales for intended use
- Repairing to accuracy standards (tolerances) vs zero error
- Submitting PISRs that are completely filled out, Submitting PISRs within 24 hours, RSAs need to identify their work with a proper label.
- Coordinating initial inspections with us.
- Submitting PISRs, ensuring devices are actually examined in person instead of just remote calibration which might miss physical issues with a device, such as a scale platform that bends while load bearing, and more information on the PSIR, such as how a scale was corrected or what the issue might have been in the first place.
- 1 LPG

  2 LPG

3 LPG

- 1. Placed in service reports being submitted on time and correctly.
  2. Identification of work and security seal placed on commercial devices.
  3. Making sure devices are correct before being placed into service.
- We don't really have problems with our RSA's
- They should have the proper standards to test the devices that they say they can. For example, enough know weight to test a railway scale. Not the interim test.
- 1. Submit PISR every time.
  2. Better use of identification stickers
- Submitting PISRs

Question 22: Are there any poorly performing RSAs or service agents you wish to report to DMS? Please list the business'/individual's names and tell us about their performance issues.

Responses are not included in the results of this survey.

Question 23: Please list the top one to three (1 – 3) changes you would like to see made to the administration of the RSA Program.

Responses:

- To be able to identify a lag time in processing of RSA licensing versus when it shows up on the RSA database.
- #1. RSA Portal: Suggest using the CDFA notification system to issue a weekly or bi-monthly Report with the most current list of registered Agencies and licensed at least until the RSA Portal can be accessed by more than one staff per county. Also, businesses do not have the ability to check for available RSA's to repair their devices and verify they are legitimate.
  #2. Training: (a) Require prospective and current service agents to receive classroom training hours. Prior to taking the licensing examination, and/or as a condition to renew their unexpired license (DMS can charge for the training to recover the cost like any other state agencies)
  #3. Re-design the licensing examination by changing the exam questions format from single standard "out of the book" questions to a "case scenario" problem with multiple questions.
- 1) Establish a DMS website DMS to report unlicensed agents, agencies and problems.
  2) And, establish a list of problematic agencies/agents accessible to W&M, this will provide a "heads up" to be aware and monitor them and enforce corrective behavior.
  3) Modify the PISR template posted on the DMS's website to include fields for devices removed from service and better description of where devices are located (unit #, checkstand # and /or department)"
- Creation and maintenance of a database tracking submeters, specifically for out of water submeters. Since many counties test water submeters that may be installed throughout the state, it would be very beneficial to have one database to track serial numbers, test results, test dates, etc.
- 1. Service agent license in ""inactive"" status when not associated with a RSA (known instances where individuals have operated absent an agency)
  2. Limit ""grace period"" on incomplete RSA renewals. De-register after a more reasonable time period.
  3. Improve RSA portal access to counties (including access to calibration certs on file).
- 1.   Outreach to RSA on requirements, including PISR, identification of work, and certification of their standards used in the course of their work.
  2.   Training offered to counties in RSA oversight and enforcement to improve consistency throughout CA.
  3.   Provide a list of certified laboratories to RSA in order for them to meet the requirement to use certified testing standards.
- There's been an ongoing issue with EVSE RSAs not submitting PISRs. When someone applies to become an EVSE RSA, maybe there can be extra emphasis on submitting PISRs.
- I think the RSA exam should revert back to being in-person and proctored.

- Keep RSA Excel lists on DMS website accessible to all.
- Broader accessibility to real time agent listings and standards for both W&M officials and public/industry.
- 1. Sales Force Portal needs work to make it more efficient.
  2. Suspending RSA, County needs to be aware that is taking place. Send out suspension list. Really can't look up a service agent due to the RSA portal not being user friendly.
  3. DMS needs to look at all commonly used devices and detail what constitutes a repair.
  4. EVSE, DMS needs to take the lead on what constitutes RSA involvement. Most work done is done through an electric company. Device may or may not be commercial until property owner makes it commercial.
  5. What RSA's are eligible to work on EVSE meters? Can't seemed to find that.
  6. How can we expect RSA to have a DC certified standard?
- Reduce the case load/territories for Anil. He is spread too thin. More device staff are needed to properly administer the program.
- Someone to answer the phone at DMS when researching a CTEP. Our last three attempts have been routed to voicemail.
- We have heard that some companies are not equipped with sufficient standards to perform the work they are licensed to do. For instance, one company that repairs retail water meters is rumored to only have a few standards in their possession but employes dozens of agents at a time. Many of the agents use plastic gallon jugs to ""calibrate"" the devices. It seems curious they are allowed to license more agents than they have standards for. Some proof that they have sufficient standards may be beneficial to the program. This could also apply to companies repairing heavy capacity scales without enough standards.
- The previous database was easier to access, but often out of date. While the new system sounds better in that is it always current, having only one designated user is cumbersome. Can read-only access be granted with lower cost than what is currently available?
- Require service agencies to register within the counties in which they will be doing work in.
- Make the transition back to paper exams and allow the counties to proctor these exams.
- Indication signaling devices that are NOT NTEP or CTEP approved are being attached to residential vapor meters (without provisions for sealing). We would like a method for follow-up on these product sellers that would make recommendations on what the seller should do, or determine where they may find these devices that are type-approved, if any.
- 1. Stricter oversight on RSA exams.
  2. More oversite on registered standards & devices serviced.
  3. A place to post issues with RSAs for all to see.
- Online list of RSA standards inventory

- 4CCR 4083(g), reduce 5-year extension, i.e., increase required license renewal examination frequency.
- 1) Make querying the salesforce database easier. It would be a HUGE help if I could query which agencies are registered for what types of devices in order to provide options to business whose device we tag. It keeps the marketplace fair and competitive rather than me only recommending the couple of businesses I am used to working with. 2) A step above that would be if an agency's assets were listed on the database. (ex: 500lbs, 1000lbs, 100gal prover, 25gal prover, etc.).
- 1. Increased RSA enforcement, training, and outreach by DMS Device Enforcement Program to industry.
  2. Increased support and training to counties by DMS for RSA enforcement.
- Accessibility by all Inspectors
- The public is not aware of the importance of DMS or county staff functions and I believe it effects funding. DMS administration needs to conduct public outreach explaining the importance of consumer protection.
- RSA'S operating in California only need to have their standards certified every five years. The same as the County Sealers. DMS has the supporting statistical data resulting from many years of previous inspections. It's absurd DMS still requires a two year certification testing on the same standards.
- Access to RSA information (must be up to date and accurate)
- Uniformity between Counties administration and enforcement
- 1) Easier access to RSA Portal.
- Faster responses to emails.
- I will defer to the Sealers who work more with this program on this question.
- Supplemental training by DMS on evaluating and issuing NOV's to service agencies.
- One of my biggest problems is out of state contracts that dont realize the RSA requirements for large gas stations, they contract all the work, and I have to explain to them they need RSA to PIS. Happens frequently.
- Clearly defined devices that can be tested by an RSA.
- 1) Provide training to county W&M staff. My staff is new. Our internal training is focused on how to inspect devices. RSAs are glanced over.
- More outreach needs to be done on who needs to be a RSA. We have device owners who try to adjust devices themselves.

Question 24: Please list the top one to three (1 – 3) changes you would like to see made to the laws and/or regulations relating to RSAs. (Business and Professions Code, Division 5, Chapter 5.5 and California Code of Regulations, Title 4, Division 9, Chapter 4).

Responses:

- Add to the BPC a Section that makes it a misdemeanor to place an incorrect device into service…unless you know which one is applicable?
- Add a requirement to §4085 Responsibility of a Service Agency (a)(2) to identify devices removed from commercial use and what happened to them in PISRs. Usually, PISRs will indicate new installation but it does specify what happened to the device it replaced. This issue becomes massive problem when submeters are replaced because there are hundreds of meters in a location and physically inspecting each unit is not feasible with our resources. We need some accountability to ensure that the "used" meters are properly disposed of because they may still have our seals affixed to them and we track devices by serial number in our inspection tracking system.
- 1. Require RSA identification on all vehicles/equipment (similar to Pest Control Business requirements)
  2. Skills competency test for device types in addition to current test (similar to categories for DPR Qualified Applicator Licensees)
  3. To somehow require quantity of calibration standards commensurate with number of employees/geographic area (don't think there would be a way to do this, but it would be nice!)
- Add a requirement to report the standards used in the process of placing a device into service. Standard number(s) and date of last certification.
- No comment on this question.
- Follow up to question 5: Are RSAs required to have the Field Reference Manual (FRM) available in the field? Where is that requirement in Code? (We have not been asking RSAs to see their FRMs.)
- Follow up question 8: We are sometimes presented devices that are not NTEP or CTEP approved, but they were not placed in service by an RSA. (Submeters and scales delivered to our office for certification prior to use.)"
- Add a verbiage to § 4085(3) Security Seals: to require an RSA to report event counter information on placed in service reports (such as Audit Trail #, Configuration #, and/or Calibration #) when physical seal(s) are not installed.
- CCR 4085(a)(1) currently reads: Each service agency shall place into service, upon installation or following repair, a device in such a manner that it meets all the requirements of Division 5 of the California Business and Professions Code and all the requirements of the California Code of Regulations, Title 4, Division 9. Weighing or measuring devices which are not "correct", as defined by Section 12500(c) of the Business and Professions Code, shall not be placed into service.
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I would like to see CCR 4085(a)(1) amended to read:
Each service agency shall place into service, upon installation or following repair, when such repair involves the installation, replacement, or adjustment or calibration of any metrological component or any component affecting the metrology of the device, a device in such a manner that it meets all the requirements of Division 5 of the California Business and Professions Code and all the requirements of the California Code of Regulations, Title 4, Division 9. Weighing or measuring devices which are not "correct", as defined by Section 12500(c) of the Business and Professions Code, shall not be placed into service.

Reasoning:
The current definitions of "repair" and "device" are extremely broad. For example, under the current requirement, an RSA reattaching a breakaway at a fueling station cannot place the device back into service if the PPU or total sale displays are not operating correctly or are sufficiently sun damaged as to make them unreadable, if the credit card reader on the dispenser is not functioning properly, or the receipt printer is not functioning properly under the requirements G-UR.4.1. This change would better allow RSAs to perform routine maintenance on a device without risking a device not being "correct". This would also help provide clarification and uniformity among county W&M officials by alleviating some of the ambiguity around "repair" and "device". Absent the suggested changes to suggestions 1 and 2, I would ask that DMS conduct a thorough analysis of the common device types to assess the full extent of what accessory components are included in that device, and the full extent of what constitutes a repair. DMS notice D-19-02 glosses over this topic when referencing "repairs" to hoses and nozzles at fueling stations, but does not address the full extent of what constitutes a device or what sort of maintenance qualifies as a repair.

- CA B&P 12515(a) currently reads:
  Any person having made repairs or adjustments to any weighing instrument or to any measuring instrument, or any person having sold, rented, leased, loaned, or installed any such instrument, who within 24 hours after the instrument has been sold, rented, leased, loaned, installed, repaired, or adjusted, fails to notify the sealer of the county in which the instrument has been sold, rented, leased, loaned, installed, repaired, or adjusted, that the sale, rent, lease, loan, installation, repair, or adjustment has been made, is guilty of a misdemeanor.

- I would like to see CA B&P 12515(a) amended to read:
- any person having made repairs or adjustments to any weighing instrument or to any measuring instrument used for commercial purposes, or any person having sold, rented, leased, loaned, or installed any such instruments used for commercial purposes, who within 24 hours a time period specified by the secretary after the instrument has been sold, rented, leased, loaned, installed, repaired, or adjusted, fails to notify the sealer of the county in which the instrument has been sold, rented, leased, loaned, installed,

repaired, or adjusted, that the sale, rent, lease, loan, installation, repair, or adjustment has been made, is guilty of a misdemeanor.

Reasoning:
The definitions of Weighing/Measuring instruments in B&P 12500, of chapter 5 of the B&P code, references "devices" and all associated accessories, but does not include a requirement for commercial purposes within the definition. "Devices", per B&P 12531(c) includes the provision for commercial purposes, but the definition is "as used in this chapter ", Chapter 5.5, as pertaining to RSAs. Other uses of "instrument" in chapter 5 are attached to specific references to commercial purposes. Additionally, "sold, rented, leased, loaned" is not listed in the definition of repair, and notification of this information is likely unnecessary. I also suggest changing "24 hours" to "a time period specified by the secretary". I feel the 24 hour notification should be reserved for repairs affecting the metrology of the device and repairs that are required by the county sealer to remedy red or blue tags affixed to the device by the county sealer. If notification is required for all other repairs, I would like to see the time frame extended to 5 business days to allow RSAs to send over non-metrological placed in service reports in batches.

- Update B&P 12531(f) repair. We are being buried with hose, nozzle and filter changes (Service Station Systems and Robinson Oil to name a couple). Update the definition to specifically exclude these items from being reported.
- The only change that might be beneficial is the creating clarity on the definition of "Placed in Service". Some counties take the opinion that a mobile home park is placing submeters into service when they install them, which requires the park to become an RSA. Other counties take the position that the county is placing the device in service and the park is merely installing them, which doesn't require the park to be an RSA. The requirement to be an RSA puts many other requirements on the park, some of which may be unreasonable given the nature of their work.
- No changes need to be made enforcement and communications need to be improved upon throughout the state..
- 1. More in depth/detailed penalty guidelines.
  2. Require a NOT placed in service report when RSA cannot repair device.
  Review of license renewals
- No changes
- 4CCR 4083(g), reduce 5-year extension, i.e., increase required license renewal examination frequency.
- Regarding question 10 above, I wish the regulation required the agency to describe the work they performed. Right now we receive very basic PSRs and it would be significantly more useful if they added a single sentence of the work performed.
- 1. Modification of Chapter 5.5 of the BPC to provide additional funding for DMS oversight of RSA enforcement, education, and training to counties and industry.
  2. Centralized electronic submission of placed in-service reports to DMS and electronic distribution/notification to counties funded by changes to Chapter 5.5 of BPC"
- DMS must provide the forms for RSA to use in notifying counties

- No new laws or regulations need to be added to an industry that's already over regulated!
- Test standards: Having available doesn't support they will be used. Borrowing vs owning
- To support the integrity of our work and the RSA program there should be a requirement that Sealer's apply security seals and/or record event counter parameters before sealing a device.
- I will defer to suggestions made by CACASA as we do not have enough registered devices to deal extensively with service agents.
- in 12532 a definition of proper standards to test.
- Have RSAs have to register in each county in which they plan to do work in. This will allow counties to know who is doing work in their county.