

Security Sealing of Devices

Last Revision: January 18, 2017

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Background

Scales as well as all other commercial weights and measures equipment are required to be sealed either by a physical security seal, event counter, or by electronic audit trail. Proper methods of sealing are included in NTEP Certificates of Conformance (CC) for each device. Scales that have a separate load receiving element will have a separate (CC). Physical seals include lead and wire, plastic, and pressure sensitive. Seals must be marked with a unique identifier for the service company and a unique identifier for the technician. Seals must be tamper evident in design.

This policy is intended as a guide for inspectors and sealers to promote uniformity of sealing and enforcement of sealing requirements.

Policy

Unsealed device:

Mark the “security seals” attribute in WinWam as “Fail”. Devices found unsealed should be marked Rejected 30-days in the “results” field of the Winwam inspection report. The inspector must investigate in an effort to determine if the seal is missing due to service company work or tampering.

1. Obtain information from the business including name of the service company, technician, date of last service work, and the service company report. Contact the service company responsible if necessary.
2. If the inspector is able to determine who caused the device to be unsealed, take the appropriate enforcement action based on the investigation and history of the offender.*
3. If the inspector cannot determine who caused the device to be unsealed, discuss G-UR.4.5 Security Seal requirements with the device owner (User) making sure they know that they are ultimately responsible for compliance. If the device is correct in all other respects, seal the device before leaving. The inspector may red tag the device and require the service company to re-test and re-seal the device.*

Identifier(s) Missing:

Devices found with missing identifiers for the service company, technician, or both should be marked on the inspection report as rejected. Contact the service company responsible with a deadline to re-seal the device with proper seal identifiers.*

Incorrect Identifiers:

Review the service company test report and contact the program associate (608)224-4942 to verify identifiers for a service company or a technician if you suspect a discrepancy. If the identifier is incorrect for the technician performing the work, contact the service company and

 [ATCP 92.23\(1\) & \(2\), & 92.24](#)
 [NIST Handbook 44](#)
Sec. 1.10 G-UR 4.5 Security Seal; 2.20 S.1.11. Provision for Sealing; and Table S.1.11. Categories of Device and Methods of Sealing (Similar requirements reside in all device specific codes)

clarify proper identifiers for technicians and require sealing with correct identifiers. Repeat offenders are subject to higher enforcement actions.*

Improper Sealing:

For devices that are sealed improperly the inspector/sealer should document the improper sealing on the test report and contact the service company to inform them of proper sealing to prevent tampering. If a change of seal type is needed, work with the service company to obtain tamper evident seals appropriate for use on serviced weights and measures devices. A second example of improper sealing, is when a seal is affixed so loosely that it does not prevent tampering. Reject the device and require the business to have the device re-sealed in a manner that is tamper evident.*

Service Company Reporting:

Service companies placing previously rejected devices back into service shall comply with ATCP 92.23(1)(2) Weights and measures service companies; reports and ATCP 92.24 Prohibited practices. Service companies found in violation of these administrative codes shall be notified of the infractions and invited to attend an enforcement conference to discourage future reporting violations.

*NOTE: Use the Uniform Enforcement Policy as a guideline for repeated sealing violations.

Effective Date: January 31, 2008
Revised: January 30, 2014