



TC 5/SC 2/p 4:	Revision of D 31: <i>General requirements for software controlled measuring instruments</i>			TC5_SC2_P4_N049	
PG vote/comments on 2CD:	TC5_SC2_P4_N046				
Circulation date:	25 July 2022	Convener: Germany – Marko Esche	Closing date for voting and/or comments: 25 October 2022 at 17:00 CET		
Date comments submitted:		Please type your comments in this form and post it (in Word format) as soon as possible and <u>no later than the closing date.</u>			
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1 **Country code** - please enter the ISO 3166 two-letter country code, e.g. CN for China on every comment row

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Country code ¹	Part	Clause/ Sub clause	Paragraph / Figure/ Table/	Type of comment ²	COMMENTS	PROPOSED CHANGE	OBSERVATIONS OF THE CONVENOR/PG on each comment submitted
NL-17			Note 2	ed	Sentence is not correct, change sentence	The manufacturer shall describe the simulation procedure which shall be made available to the relevant authorities depending on national legislation, see clause 6.3.9 and clause 7.1.2.	Such a description of the simulation procedure would be dealt with just like any other documentation submitted for type evaluation. There appears to be no need to make an exception here. Also, it was specifically proposed by SG2 to only make the result of the procedure available to the relevant authorities. This has been clarified by adding the missing comma in the sentence.
US-01	3	3.2	3.2.7	Ed	Under Note 1, replace “support” with “utilize” as this better characterize the function.	“Communication interfaces can utilize wired, optical, radio...”	The definition has been amended accordingly.
US-02	3	3.2	3.2.13	Ed	Definition is limited.	Remove the word “only” from the definition.	The current definition highlights that other modules (with analog input signals) would not fall into this category. Therefore, the current phrasing should be kept.
US-03	3	3.2	3.2.16	Ed	Phrasing in the note could be refined.	Remove “be considered to”	Agreed. The verb “may” already implies that alternatives are possible.
US-04	3	3.2	3.2.24	Ed	Note 2 uses the term “preimage resistance”. Is this term sufficiently common knowledge that it does not require some sort of definition, explanation, or other clarification? Or perhaps a more colloquial term? Admittedly this becomes complex, given that this is a term used in a note and not a definition itself.	Could add the phrase to the note, “... where preimage resistance refers to the inability (computational infeasibility) to reconstruct a preimage or message from a message digest.”	Agreed.
US-05	3	3.2	3.2.50	Ed	Does the list imply that this feature set is all-inclusive for any OS? These four features appear to be all-encompassing, but might there be other services provided by an OS? For example, user access control and security might be not be considered data management, even though technically, this may be so.	It is a bit difficult to limit the set of examples appropriately. As an example, the text could be, “software to control program operation and to provide the services for resource allocation, task scheduling, I/O control, and data management, <u>as well such tasks as access control and security.</u> ”	Agreed.
UK-04		3.2.19, 6.2.6.1, etc		te	“significant defects” is mentioned in several places but is not defined in the terminology	Add a definition for “significant defects” along the lines of the commonly used definition for “significant faults”	The definition for “significant defect” is given in clause 3.2.55. Therefore, no change is needed.

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AU-01	1	3.2.55		te	Does a significant defect include a significant fault or a fault, or both? A fault is distinct from a significant fault. A checking facility is not necessarily required to detect and act upon fault but it may be required to detect and act upon a significant fault. (D 11, 3.19) Should the definition include a significant fault rather than a fault? Or clarify that the term fault should be interpreted generally to include a significant fault.	Suggest either: The Note include a specific example of a significant fault as an example of a fault which would be considered a significant defect. E.g.: “Examples of significant defect include: a) deletion of the audit trail; b) inadmissible parameter changes; c) unauthorised updates d) accidental software changes due to physical effects e) a significant fault due to the effect of an influence quantity. ” Or amend the definition as follows: “incident that has an undesirable impact on the compliance of the measuring instrument, a fault, or a significant fault ”	Since term “fault” used in the definition seems to cover all kinds of faults, it would appear justified to add “significant fault” as a fifth example.
JP-01		3.2.6 cloud	2 nd sentence of Note	ed	“Not” is redundant in the second sentence.	Delete the first “not” from the text as shown below. <i>Their physical location may not be not known and not fixed.</i>	Agreed, see also response to KE-01.
KE-01	3	3.2.6	Note	ed	The last sentence not flowing grammatically	Their physical location may not be known and not physical	The typo in the last sentence (duplicate “not”) has been corrected. The rest of the sentence should now be fine.
DE-01	1	6.1	1	Ed	The second bullet point seems to be missing something to make sense.	Change to “...specific configurations (6.3), which cover additional requirements...”	Agreed. The addition clarifies the intention of the bullet point.
US-06	6	6.2	6.2.3.1	Ed/te	While we note that the response to comment US-07 in the previous draft regarding digital signatures as an example for protecting data, we continue to take issue with the text as written, since a signature itself is not a means to check the correct functioning of software. For instance, the software may contain a bug that calculates an incorrect value for a certain datum in a particular instance. The software may be authentic and properly signs the erroneous data set, but it is not correct.	We suggest the following text: If legally relevant software runs on a universal device such as a smartphone, it may not be possible to fully secure the software as required. Instead, additional external protection means (e.g. digital signatures for transmitted or indicated measurement data) may be used to check the correct behavior <u>authenticity</u> of the software. OR ... may be used to <u>ensure that produced data is authentic, confirming the software is functioning as intended.</u>	Agreed. The second option will be implemented since it explains the intention behind the phrase “correct behaviour”.
US-07	6	6.2	6.2.3.6	Ed	In the last sentence prior to the note, “If the audit trail has no more capacity an appropriate response is required i.e., either the oldest entry may be deleted, or no other change of a parameter shall be possible without breaking the seal.” - Interventions other than breaking of a (physical) seal are possible - this is just one example. The sentence could be modified to indicate that breaking of a seal is one type of intervention.	Alter the sentence as follows: “If the audit trail has no more capacity an appropriate response is required i.e., either the oldest entry may be deleted, or no other change of a parameter shall be possible without <u>further intervention, e.g. breaking a physical seal.</u> ”	Other interventions (apart from breaking a physical seal) may indeed be possible. However, such a technical change should be properly discussed within the frame of the next revision.
UK-02		6.2.1, 6.3.2.4, 6.2.6.3, etc	2	gen	“verification software” is mentioned in several places but is not defined in the terminology	Add a definition for “verification software” in the terminology similar to the statement in the first paragraph of 8.3.2 “software for verification purposes on the remote unit”	A definition has been added to clause 3.2. The wording has been amended to clarify that the remote unit is used to verify a measuring instrument.

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NL-02		6.2.3.1		ed	2 nd note speaks of protection of measurement data, add reference to 6.3.4		Clause 6.3.4 addresses storage of data whereas clause 6.2.3.1 addresses protection during processing, i.e., protection in volatile memory. It is unclear why the reference to the storage clause should be added.
UK-01		6.2.3.1	Example 1	ed	The final text states “see also example in 6.3.2.2.46.3.2.2.2”	Select correct reference and delete the other	The reference to 6.3.2.2.4 has been deleted.
NL-03		6.2.3.3		ed	2 nd item should also be inadmissible	Not be able to inadmissibly influence the legally...	Agreed. The adverb “inadmissibly” was missing in the sentence.
UK-03		6.2.3.5	note	gen	What is the definition of a trustworthy institution?	Add a definition/clarification	OIML issuing authorities would probably count as “trustworthy” in this context. This has been added as one possibly example in the text.
JP-02		6.2.4 Prevention of misuse	Last line of Examples :2)	ge	The smartphones, tablets, and watches are mobile devices. An omission of correcting “smartphone” in the example.	Change “the smartphone for indication” to “the mobile device such as a smartphone for indication”.	The term has been corrected accordingly.
NL-04		6.2.6.3		ed	“if support” should be rewritten	When 6.2.6.1 or 6.2.6.2 is part of... Or If 6.2.6.1 or 6.2.6.2 is part of...	The phrase “support of” was chosen by SG2 on purpose to highlight that 6.2.6.1 and 6.2.6.2 are not part of remote verification themselves.
NL-05		6.2.7		ge	Legal time is discussed here and explained in note 4, shouldn’t it be a definition in chapter 3?	Add “legal time” as a definition to chapter 3	Neither VIM nor VIML contain a definition for “legal time”. Since the exact meaning will be up to national regulations, we should not impose any restrictions on the term. To clarify this, a reference to national regulations has been added to the sentence.
US-08	6	6.3	6.3.2.1	Ed	Correct the spelling of “pairing” in the note at the bottom of p. 32.	“In general, <u>pairing</u> parameter means any parameter that is...”	The typo has been corrected.
US-09	6	6.3	6.3.2.1	Ed	For the last sentence on the second bullet point at the top of p. 34, the phrase could be refined as suggested	“The component also ensures that the measurement result <u>can be printed or indicated as required.</u> ”	The sentence has been amended as suggested.
US-10	6	6.3	6.3.2.2	Ed	Suggest the correction shown for p. 35, Note 1 at the center of the page.	“This does not preclude legally relevant modules <u>from showing</u> intermediate measurement data.”	The sentence has been modified as suggested.
US-11	6	6.3	6.3.6.3	Ed/te	The first example under “Bootling” indicates a case where the password is sealed inside the housing of the instrument. This is a poor security practice something we would be hesitant to include in a recommendation, given that it allows for the password to be compromised, copied, shared, etc.	Remove the example.	The described solution is widely used in several countries. The password is usually device-specific, so that copying, sharing etc. have no consequence. This has been clarified in the example.
US-12	6	6.3	6.3.8.4	Ed	On the bottom of p. 50, a minor rephrasing of the last note is suggested.	“PGs need to define a sufficient capacity for the audit trail and need to define <u>the appropriate response.</u> ”	Agreed. The note has been aligned with the text of 6.3.8.4.9 as suggested.

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JP-03		6.3.2.1 Separation of components	Whole clause	ed	Although subclauses underneath the clause are deleted, they are helpful.	Reinsert the subclauses (6.3.2.1.1, 6.3.2.1.2,) which existed in 1CD.	The formatting problem has been resolved. All five-digit subclause numbers have been reintroduced in the revised document.
JP-05		6.3.2.1 Separation of components Example :	6th line of 1st Example	ge	The smartphones, tablets, and watches are mobile devices. An omission of correcting “smartphone” in the example.	Change “the smartphone for indication” to “the mobile device such as a smartphone for indication” as shown below.	It is assumed that the example in subclause 6.3.2.1.7 is addressed. The term has been corrected accordingly.
UK-05		6.3.2.1	Example 1	ed	A reference is made to 6.3.2.1.2 but this sub-clause is not identified. In fact, no fifth level headings are numbered despite there being a large number of references to them throughout the document	Number fifth level sub-clauses throughout the document	The formatting problem has been resolved. All five-digit subclause numbers have been reintroduced in the revised document.
UK-07		6.3.2.1	2nd note p.32	ed	“Paring” is used in the second note on page 32	Change “Paring” to “Pairing”.	The typo has been corrected, see US-
NL-06		6.3.2.1 and up		ge	Alignment of text throughout the document starting from 6.3.2.1 up to 6.3.9.4	Change indentation of first sentence	The alignment issue originated from a false format for all five-digit subclauses. The problem has been resolved by reintroducing those subclause numbers. See comments JP-03, JP-06, UK-05 etc.
JP-04		6.3.2.1 Separation of components	Second Note in p. 32 in clearn ver.	ed	“(P)aring” is a typo.	Correct “paring” to “pairing”.	
UK-06		6.3.2.1, 6.3.8.4,	Several paras and clauses	ed	The indent of several paragraphs in this clause appears to be not aligned	Align the indents of the paragraphs	The alignment issue originated from a false format for all five-digit subclauses. The problem has been resolved by reintroducing those subclause numbers. See comments JP-03, JP-06, UK-05 etc.
JP-06		6.3.2.2 Separation of modules	Whole clause	ed	Although subclauses underneath the clause are deleted, they are helpful.	Reinsert the subclauses (6.3.2.2.1, 6.3.2.1.2,) which existed in 1CD.	The formatting problem has been resolved. All five-digit subclause numbers have been reintroduced in the revised document.
NL-07		6.3.2.2		ge	Reference is made to certain examples, but these references are not mentioned in the examples themselves	Make reference in examples	The references to examples in clauses 6.3.2.2.1, 6.3.2.2.2 etc. referred to the clauses with five-digit clause numbers. Since those numbers were missing because of a formatting problem. Proper referencing was impossible. The formatting problem has been resolved. See comments JP-03, JP-06, UK-05 etc.
DE-06	1	6.3.2.2.1	1st paragraph	Ed	The last sentence state, “The conformity requirement applies to ...”	“The conformity requirement” is not a very concise expression, change to “This requirement ...”	Agreed. The expression has been corrected.

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JP-07		6.3.3 Shared indications Examples : 3)	2 nd and 4th line	ge	The smartphones, tablets, and watches are mobile devices. An omission of correcting “smartphone” in the example.	Change “smartphone” to “mobile device”.	
NL-08		6.3.4.3.1	example	te	In example 3 a “service level agreement” is mentioned, but how will this be part of the type approval process and during verification? We prefer to remove reference to the service level agreement.	Remove reference to the SLA.	Examining an SLA during type approval does indeed pose a problem. However, the next sentence of the example already states that the measuring instrument checks completeness of the stored data. Therefore, the reference to the SLA can be kept for illustration purposes.
JP-08		6.3.4.4 Automatic storing	Whole clause	ed	Although subclauses underneath the clause are deleted, they are helpful.	Reinsert the subclauses (6.3.4.4.1, 6.3.4.4.2,) which existed in 1CD.	The formatting problem has been resolved. All five-digit subclause numbers have been reintroduced in the revised document.
NL-09		6.3.5.2.1	example	ed	Last item has a different font	Change font	The font size has been corrected.
JP-09		6.3.6.3 Boot process	Whole clause	ed	Although subclauses underneath the clause are deleted, they are helpful.	Reinsert the subclauses (6.3.6.3.1, 6.3.6.3.2,) which existed in 1CD.	The formatting problem has been resolved. All five-digit subclause numbers have been reintroduced in the revised document.
NL-10		6.3.6.3		ed	Text alignment needs to be corrected “booting via open interfaces shall be prohibited” is around example box	Change alignment of text and/or “wrapt text” of example box	The wrong alignment was due to the false formatting of all five-digit subclause titles. This has been corrected.
UK-08		6.3.6.3, 6.3.6.3.3	Line 3	gen	“Chain of trust” is used in these clauses	Add a definition or explanation for “Chain of trust” in the document	Agreed, an explanation of the term is needed. However, to align D31 with the text agreed in TC9/SC1 for R76, the following note will be added to the clause: “A chain of trust from the protected hardware to the loaded legally relevant software serves the purpose to ensure integrity and authenticity of the legally relevant software via mutual authentication of the individual software modules.”
JP-10		6.3.6.5 Protection during use	Whole clause	ed	Although subclauses underneath the clause are deleted, they are helpful.	Reinsert the subclauses (6.3.6.5.1, 6.3.6.5.2,) which existed in 1CD.	The formatting problem has been resolved. All five-digit subclause numbers have been reintroduced in the revised document.
JP-11		6.3.6.7 Identification and traceability	Whole clause	ed	Although subclauses underneath the clause are deleted, they are helpful.	Reinsert the subclauses (6.3.6.7.1, 6.3.6.7.2,) which existed in 1CD.	The formatting problem has been resolved. All five-digit subclause numbers have been reintroduced in the revised document.
NL-11		6.3.8.3		ed	Reference is made to “Fig. 1” but no link to the text	Add link to “fig 1”	

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JP-12		6.3.8.4 Traced update	Whole clause	ed	Although subclauses underneath the clause are deleted, they are helpful.	Reinsert the subclauses (6.3.8.4.1, 6.3.8.4.2,) which existed in 1CD.	The formatting problem has been resolved. All five-digit subclause numbers have been reintroduced in the revised document.
JP-13		6.3.8.4 Traced update	5th line of 1st para.	ed	Referring Figure 1 is necessary in the requirement of <i>Traced update</i> .	Add “As shown in Fig. 1” in the beginning of the fifth sentence. <i>an audit trail (see 3.2.1). As shown in Fig 1, the procedure of traced update comprises several steps:...</i>	The reference has been added to the sentence.
JP-14		6.3.8.4 Traced update	Figure 1	ed	Clause numbers in the figure are incorrect.	Correct the clause number of <i>Traced update</i> from 6.2.8.4 to 6.3.8.4, and that of <i>Verified update</i> from 6.2.8.3 to 6.3.8.3.	The figure has been modified as suggested.
NL-12		6.3.8.4		ed	Fig 1 and notes are not on the same page while this would fit and make it more readable	Put notes on same page as Figure 1	The figure has been resized, so that figure and notes fit on the same page.
JP-15		6.3.9.1 General	Whole clause	ed	Although subclauses underneath the clause are deleted, they are helpful.	Reinsert the subclauses (6.3.9.1.1, 6.3.9.1.2,) which existed in 1CD.	The formatting problem has been resolved. All five-digit subclause numbers have been reintroduced in the revised document.
NL-13		6.3.9.1		ed	“It shall always be possible to establish and ensure the integrity of the instrument to be verified.” Authenticity is mentioned separately from integrity, but this could well be in one sentence	“It shall always be possible to establish and ensure the integrity and authenticity of the instrument to be verified.” Create one example block with example 1 and 2	The example in subclause 6.3.9.1.3 only addresses authenticity. Combining both clauses would therefore probably cause some confusion. Since both clauses work independently, they will not be combined for the time being.
DE-02	1	6.3.9.1.12	Note & 3rd paragraph	Ed	Is the note still necessary? The requirement following the note requires the existence of additional data.	We could rephrase the requirement to “PGs shall decide if additional data has to be stored and the content of that data”. That would give us the conditional in the requirement and the note is no longer necessary. Optionally, we could move the note below the 3rd paragraph (and leave that paragraph as is), since that paragraph now deals with additional data.	The note serves as an introduction to the mentioned requirement. Changing the order would not improve the clause. The issue will be solved during restructuring in the frame of the next revision.
JP-16		6.3.9.3 Direct extraction of test items	Whole clause	Ed	Although subclauses underneath the clause are deleted, they are helpful.	Reinsert the subclauses (6.3.9.3.1, 6.3.9.3.2,) which existed in 1CD.	The formatting problem has been resolved. All five-digit subclause numbers have been reintroduced in the revised document.
CECIP-01		7.3.2.2 Page 61			Preconditions: In addition, the services of the programmer should be made available to the examiner for the purposes of answering questions. It is not possible to make the programmer available for questions of the examiner.	Proposal: In addition, the manufacturer shall support the examiner with respective means (description of testing algorithms,...) for the purposes of answering questions.	For source code analysis, this is common practice in many countries. Moreover, this clause has been part of D31 since 2008 and has never caused any problems. Therefore, no change is needed.
NL-14		7.3.2.3 Annex A ref [8]		ed	Reference is made to WelmeC guide, Annex A refers to 2019 version, update to 2022	Update reference in Annex A to 2022	The reference has been updated.
US-13	8	8.1	Note	Ed	In the note at the center of the page in the last sentence, remove the comma as indicated	“This does not affect the requirement that instrument software shall be verifiable.”	The comma has been removed.

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CECIP-02		8.1 Page 66			Verification of a measuring instrument General: With the wording “The verification of the software shall include”, all of the four following bullet points are mandatory. It should be up to PGs to decide, which of the 4 bullet points shall be undertaken for which instruments in which cases.	Proposal: “Verification of software may include one or more of the following aspects. PGs shall decide on particular requirements when writing instrument-specific verification procedures.”	During drafting of clause 8.1, it was the joint opinion of the PG members, that all four aspects should be mandatory. Since PGs may divert from D31 wherever they choose, anyway, there is no need to change the clause.
NL-15		8.3.1		ed	Reference is made to “Fig. 2” but no link to the text	Add link to “fig 2”	Reference has been updated with a link to the figure.
DE-08	1	8.3.2	1st paragraph	Ed	The statement “This connection shall comply with clause 6.3.5,...” is an exact repetition of 6.3.9.4.1.	Delete the sentence in 8.3.2.	Since 8.3 gives instructions on how to perform a remote verification, it does not hurt to repeat the requirement here. To highlight this, the sentence has been turned into the following note: “ <u>Clause 6.3.9.4.1 requires that this connection shall...</u> ”
DE-09	1	8.3.2	Note 1	Ed	It appears useful to explicitly state which data need to be included in the certificate to enable specific remote verification procedures.	Add “and list test items with their unique identification used for the remote verification procedure, see 7.2.2” to the note.	Agreed. The note has been extended.
DE-10	1	8.3.2	Note 4	Ed	The note seems misplaced in the verification clause since the mentioned requirements are located in other clauses.	Move the note to 6.3.9.1.1.	As an explanation for users of clause 8.3, the note is useful. Therefore, there is no need to move it.
DE-11	1	8.3.3.1	Note	Ed	The note seems misplaced in the verification clause since it addresses the instrument’s software. We already have a clause on storage of remote verification results in 6.3.9.1.12.	Move the note to 6.3.9.1.12.	8.3.3.1 describes storage of remote verification data outside the instrument, whereas 6.3.9.1.12 describes storage of data within the instrument. Therefore, the note should stay in place.
JP-17		8.3.3.2 Direct extraction of test items	Whole clause	Ed	Although subclauses underneath the clause are deleted, they are helpful.	Reinsert the subclauses (8.3.3.2.1, 8.3.3.2.2,) which existed in 1CD.	The formatting problem has been resolved. All five-digit subclause numbers have been reintroduced in the revised document.
DE-12	1	8.3.3.2.1		Ed	We should highlight the implications of 6.3.9.3.3 here and explain that certain test items must be available.	Add “Relevant test items identified by the PGs shall be available, see 6.3.9.3.3” after the first paragraph.	Agreed. The explanation seems useful.
DE-03	1	8.3.3.3	Title	Ed	The title no longer accurately represents the content of this clause	Change title to: Instrument-specific verification procedures	Agreed. Since the clause only addresses remote verification, we should include this in the title.
JP-18		8.3.3.3 Test setup, simulation of measuring process	Whole clause	ed	Although subclauses underneath the clause are deleted, they are helpful.	Reinsert the subclauses (8.3.3.3.1, 8.3.3.3.2,) which existed in 1CD.	The formatting problem has been resolved. All five-digit subclause numbers have been reintroduced in the revised document.

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NL-16		8.3.3.3	Note 1	ed	Sentence is not correct, change sentence	Change to: The manufacturer shall describe the test procedure which shall be made available to the relevant authorities depending on national legislation, see clause 6.3.9 and clause 7.1.2.	Such a description of the test procedure would be dealt with just like any other documentation submitted for type evaluation. There appears to be no need to make an exception here. Also, it was specifically proposed by SG2 to only make the result of the procedure available to the relevant authorities. This has been clarified by adding the missing comma in the sentence.
NL-18		Annex B		ed	Example shows dates in 2003, the date in itself is not relevant but would be good to update the date to more present time date	Update Annex B example with dates in 2022 or 2023	Dates have been updated accordingly.
NL-01		Contents		ed	Contents list is very high level, hard to look for right clause based on content list	Extent content list with 1 or 2 levels	Where subclause titles were available, the table of contents has been extended by another level. This was omitted for the terms and definitions in clause 3.2 since the table of contents for all terms would fill three pages all by itself.
DE-07	1	General		Ed	“Information” and “data” are inconsistently referred to in plural and singular form in the document.	Please amend the text to use plural form throughout the document.	Agreed. All instances of “data” and “information” have been checked and amended where necessary.
DE-04	1	Index		Ed	The term “acceptable solution” is only used in 6.21 which does not contain an acceptable solution. The term has no specific meaning in D31.	Delete the term “acceptable solution”.	Agreed. We can delete the term from the index. This was probably left over from D31:2008 where examples were also referred to as “acceptable solutions”.
DE-05	1	Index		Ed	Why do we differentiate between the terms authentication and authenticity? In D31, authentication is always performed to validate authenticity, can’t we just stick with authenticity?	Merge both lists into authenticity.	Although “authentication” is rarely used in D31, the two terms to address different things: the process of authentication vs. the property of authenticity. Therefore, we should not mix both.