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### **IC Ruling for SPX and VNE Corporations RAN for Fittings**

The 3-A SSI Interpretations Committee (IC) met via conference call on August 22, 2008 and again on September 19, 2008 to discuss and rule on the July 9, 2008 alleged RAN submitted by Land O'Lakes Corporation. The RAN claims VNE Corporation "E-Line" and SPX Corporation "I-Line" fittings are not in compliance with 3-A Standard 63-03 (*Sanitary Fittings*), Sections D10, D10.1, and D10.1.1 (Radii). The RAN specifically stated:

\*On June 25, 2008 members of the California Department of Food and Agriculture reviewed these fittings and declared that compliance with 3-A Standards is not met. Further review by members of the USDA resulted in the same finding. The area of non-conformance is in the machined right angle gasket area of the female fitting. The radii are not more than 1/64 inch.

The standard states that this is acceptable if the radii are required for essential functional reasons, such as those in gasket retaining grooves. The USDA and CDFA contend that this is not a gasket retaining groove, but a gasket seat which must have no less than 1/8 inch radius to be compliant.

\* Note: The RAN from Land O'Lakes has an error in wording. The fourth sentence reads, "The radii are not more than 1/64 inch" (which means that it is less than 1/64 inch). It should state: "The radii are less than 1/8 inch, but more than 1/64 inch.", since the issue at hand is whether or not the 1/8 inch general radius or the 1/64 inch minimum radii exclusion for "essential functional reasons" governs. This error has no bearing on the final outcome of the RAN.

After reviewing all of the evidence from the parties, consulting 3-A Standard 63-03, and listening to testimony provided by the manufacturers, the IC concluded the following concerning the SPX Corporation "I-Line" fitting and the VNE Corporation "E-Line" fitting:

1. That the machined right angle gasket area of the female fitting (the gasket recess) is not a gasket retaining groove (as defined in Standard 63-03, Section D.7.3), as claimed by the RAN.

2. The machined right angle gasket area of the female fitting (the gasket recess) is a product contact surface, and therefore Section D10 (Radii) of Standard 63-03 applies.
3. The function of gasket recess is to provide uniform gasket compression and self alignment of the male and female fittings. This prevents crevices and gasket intrusions inside at the gasket joint between the fittings. These are necessary performance attributes.
4. The gasket recess has a radius of 1/32 inches. This smaller-than-the 1/8 inch general radius is needed to affect the uniform gasket compression and self alignment of the male and female fittings enumerated in item 3, above. Therefore, this radius is needed for an “essential functional reason”, as defined in the 3-A *Format & Style Manual*, Version 00-02, for this design.
5. The applicable sections of the governing 3-A Standard (63-03) state:

“D10 Radii

D10.1 All internal angles of less than 135° on product contact surfaces shall have radii of not less than 1/8 in. (3.18 mm), except that:

D10.1.1 Smaller radii may be used when they are required for essential functional reasons, such as those in gasket retaining grooves. In no case shall such radii be less than 1/64 in. (0.397 mm).”

Clause D10.1.1 (and not D10.1) of Standard 63-03 applies in this case because a radius of less than 1/8 inch is required (but it must be more than 1/64 inch) for essential functional reasons.

The Interpretations Committee stated that the specific name “gasket recess” (or seat) does not need to appear in Clause D10.1.1. The IC noted that in the past (in IC Ruling 02-06 for Standard 02-09, *Milk Pumps*), the IC ruled that the wording “such as” (which appears in Clause D10.1.1 of Standard 63-03, as well) as meaning “for example” (or “not limited to”), thus allowing other items not listed, if they are required for “essential functional reasons”. Although this previous IC ruling applies specifically to Clause D9.1.1 of Standard 02-09, and not to any other 3-A Standard, the IC felt compelled that the words “such as” appearing in Clause D10.1.1 of Standard 63-03 mean the same as they do in Clause D9.1.1 of Standard 02-09.

Therefore, the Interpretations Committee unanimously finds that the Report of Alleged Nonconformance claiming non-compliance of the SPX Corporation “I-Line” fitting and the VNE Corporation “E-Line” fitting with 3-A Standard 63-03 (*Sanitary Fittings*), submitted to 3-A SSI by Land O’Lakes Corporation on July 9, 2008, to be non-substantiated. The RAN is therefore dismissed.

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| Date received by 3-A SSI:<br>July 9, 2008                      | IC Chair                    |
| Date reviewed by IC:<br>August 22, 2008 and September 19, 2008 | Randy Elsberry              |
| Date of response:<br>September 29, 2008                        | Date:<br>September 29, 2008 |