



CALIFORNIA DEPARTMENT OF
FOOD & AGRICULTURE

April 8, 2026

DMS Notice
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TO: WEIGHTS AND MEASURES OFFICIALS

SUBJECT: Registered Service Agency Requirements – Submeter Applications

The Division of Measurement Standards (DMS) has recently received inquiries regarding Registered Service Agency (RSA) requirements for submeter applications. It is typical in these situations that the devices are inspected, tested, and sealed by any County Office of Weights and Measures and subsequently installed by another party after they are sealed.

The word “repair”, in any of its variant forms, is defined to include “to install” [[Business and Professions Code \(BPC\) Section \(§\)12531\(f\)](#)]. The installation of a device affects whether or not the device will meet all applicable requirements.

A device may only be placed into service, upon installation or following repair, by a sealer or an RSA [[BPC § 12532\(d\)](#) & California Code of Regulations, Title 4 ([4 CCR](#)) § 4085(a)(1)].

While a person who repairs their own device is not required to register as a service agency [[BPC § 12532\(e\)](#)]; a device which has been repaired cannot be used for commercial purposes unless placed in service by a Sealer or an RSA as described above [Also see [DMS Notice D-16-05](#)].

Any person who allows a device to be used for commercial purposes which has not been placed into service as defined in [BPC § 12531\(d\)](#) is in violation of [BPC § 12532\(d\)](#).

When a service agency installs or repairs a device used for commercial purposes, it shall be placed into service in accordance with [4 CCR § 4085\(a\)\(1\)](#).

If you have questions, please contact the Device Enforcement Program at (916) 229-3000 or dms@cdfa.ca.gov.

Sincerely,

Kevin Schnepf
Director

cc: Hyrum Eastman, County/State Liaison, CDFA

