

**REPORT OF THE  
DEPARTMENT OF AGRICULTURE  
AND CONSUMER SERVICES**

# **Long-Term Plan for Funding of the Weights and Measures Program**

**TO THE GOVERNOR AND  
THE GENERAL ASSEMBLY OF VIRGINIA**



**HOUSE DOCUMENT NO. 35**

**COMMONWEALTH OF VIRGINIA  
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## **Introduction**

he 2003 Appropriations Act reduced the general fund appropriations to the Virginia Department of Agriculture and Consumer Services (VDACS) to carry out the Weights and Measures program by \$650,000. The 2003 Appropriations Act also required the Commissioner of Agriculture and Consumer Services to collect a fee of \$9.00 beginning July 1, 2003 from all entities subject to Weights and Measures regulation pursuant to Chapter 35 of Title 3.1 of the Code of Virginia for each device subject to inspection.

The 2004 Appropriations Act further reduced the fee to \$4.00 for each commercial weighing and measuring device and directs that, “The Commissioner shall develop a long-term plan to adequately fund the weights and measures program. In developing the plan, the Commissioner shall seek input from representatives from local governments, private sector organizations and the public. The plan’s objective is to develop a financial strategy for the program that will protect the public and the business sector without undue regulatory burdens. The plan shall address, but not be limited to, these factors: (1) the likelihood of additional general fund resources for this activity; (2) projected workloads, including the total number of devices subject to regulation and by type of device; (3) cost containment strategies in regulatory management through increased reliance upon technology; (4) options to fund the program or a portion of the program through a flexible fee schedule that considers the number of devices used by a business establishment and the time and resources to test such devices; and (5) legislation to implement the plan. The Commissioner shall submit the plan no later than January 14, 2005, to the Chairmen of the Senate Finance and Agriculture, Conservation and Natural Resources Committees, and House Appropriations and Agriculture, Chesapeake and Natural Resources Committees. Legislative proposals to carry out the plan must be introduced no later than January 14, 2005.”

VDACS and industry groups have met, discussed and evaluated this issue over the past two years. A number of findings and options for operating a Virginia Weights and Measures Program have been considered. Industry and consumers support continuation of an effective Weights and Measures Program. Industry is opposed to fees as a mechanism to fund this program. However, mindful of the ongoing fiscal challenges faced by Virginia state government, VDACS recommends continuing the current funding mechanism and modifying the operations of the program to provide flexibility in the frequency of inspections and partner with the private sector to accept private scale company inspections and service of weights and measures devices as official inspections subject to random verification by VDACS.

## **Background**

The Virginia Department of Agriculture and Consumer Services values the opinions and recommendations of the businesses regulated by the laws administered by this agency. The Department invited several industry associations to participate in the development of this report and to offer their recommendations on how the Weights and Measures Program should be funded. Industry representatives who participated in these discussions are listed in Appendix B.

At the direction of the 2003 Session of the General Assembly, VDACS began work with a coalition of industry representatives. The initial meeting of the work group was held on May 29, 2003. During this meeting VDACS provided an overview of the Weights and Measures Program

and discussed the fiscal status of the program over the previous ten-year period, the growth in the number of weighing and measuring devices and program accomplishments during recent fiscal years. At the close of this meeting, the industry representatives asked VDACS to determine the various methods used by other states to fund weights and measures activities.

The second work group meeting was held on July 23, 2003. In response to the questions posed by the industry representatives at the May 29<sup>th</sup> meeting, VDACS reported that a survey of Mid-Atlantic States determined that Maryland and Tennessee both charge a device registration fee. Additionally, Washington, DC, West Virginia, and South Carolina are in the process of establishing fees or had fee legislation introduced during the past legislative session. Only North Carolina and Kentucky reported no activities related to the establishment of fees for Weights and Measures Programs. Since the July 23<sup>rd</sup> meeting, staff has obtained a preliminary report from the National Conference on Weights and Measures entitled, "*Survey of Inspection Statistics Collected by State Weights and Measures Programs*,"<sup>1</sup> which reports that 30 states have either a registration fee or licensing fee for weighing and measuring devices (survey based on response from 40 of the 50 states).

Following the 2004 Session of the General Assembly the Agency continued working with the coalition in the development of a long-term plan to fund the Weights and Measures Program. The first meeting with the coalition was held on September 8, 2004 and included Agency representatives and a select group representing the industries of the coalition. This meeting focused on funding alternatives for the Weights and Measures Program.

On November 17, 2004 the workgroup met to continue discussions. This meeting focused on possible alternatives for the operation of the Weights and Measures Program. These possible alternatives will be discussed in detail later in this report.

### **Industry Position on Fees & General Fund Resources for Weights and Measures Program**

Industry representatives unanimously support the activities of the state Weights and Measures Program. However, due to the vast scope of all Weights and Measures activities, which serve businesses and consumers equally, they considered the application of fees to only device owners as unfair. In general, the industry representatives did not support the implementation of a device registration fee unless it was applied equally to all businesses benefiting from the services provided by the Weights and Measures Program. As the Weights and Measures Program supports the activities of businesses, protects consumers, and provides a level playing field for everyone involved, the industry representatives strongly feel that the Commonwealth's Weights and Measures Program needs to be supported by general funds. Therefore, no consensus could be formed on any type of fees for this activity.

### **Projected Workloads, Number of Devices by Type Subject to Regulation**

The activities often referred to as Weights and Measures include a wide-variety of responsibilities. In addition to Weights and Measures inspections, inspectors are involved in the regulation of motor fuel quality and agricultural commodities. There are a total of 39.0 FTE positions assigned to all of these activities. In order to efficiently address all mandated

inspections on a statewide basis, these 39.0 FTE positions perform varying levels of all types of inspections. However, the program maintains a level of activity equal to the FTE level assigned.

For example, there are 2.0 FTE equivalents assigned to motor fuel quality and 5.0 FTE equivalents assigned to the regulation and sampling of agricultural commodities. The remaining 32.0 FTE positions carryout the Weights and Measures activities performed by the work unit. Sixteen FTE equivalents are involved in testing the accuracy of point-of-sales systems, verifying the accuracy of packaged commodities, enforcement of advertising and method of sale requirements, auditing sales activities, and the investigation of consumer complaints. Additionally, these positions are responsible for the enforcement of the Commission Merchant, Cotton Handlers, Weights and Measures Service Agency and Technician, Burley Tobacco, and Public Weighmaster Laws. These positions continue to be funded by general fund revenue. The remaining 16.0 FTE equivalents are engaged in the testing and inspection of all commercially used weighing and measuring devices. The range of devices in this list includes: retail motor fuel devices; retail computing scales; medium capacity bench, counter, and floor scales; fuel oil and liquid petroleum gas (LPG) meters, both vehicle mounted and bulk; and large capacity scales which includes vehicle, belt conveyor, and railroad scales.

The following table details the number of devices by specific type:

<b>DEVICE TYPE*</b>	<b>TOTALS</b>
Petroleum Dispensers	74,845
Truck Stop Dispensers	617
Taxi Meters	1,442
Moisture Machines	136
Vehicle Tank Meters	1,901
Bulk Plant Meters	762
Liquefied Petroleum Gas Meters	1,256
Computing/Hanging/Counter/Platform Scales	23,499
Warehouse Scales	361
Vehicle Scales	1,277
Hopper Scales	204
Livestock Scales	61
Monorail Scales	2
Railroad Scales	44
Analytical Balance	264
Belt Conveyor Scales	3
Crane Scales	6
Vehicle On-Board Weighing System	75
	106,755

(\*Definition of Device Group is contained in Appendix B)

## **Reduction of Weights and Measures Inspections due to Revenue Reduction**

We have determined the average cost per position for VDACS weights and measures field inspection staff to be \$41,764 per position. Based on the \$515,602 loss of revenue which occurred when the fee was reduced from \$9.00 to \$4.00 per device, 12.0 FTE positions must be held vacant or eliminated in order to operate with the reduced revenue level. A reduction of 12.0 FTE positions will leave 20.0 FTE positions to be allocated to all Weights and Measures activities. Due to the specialized nature of work and equipment used in the testing of large capacity scales and meters, 8.0 FTE positions continue to perform this type of inspection activity. These devices represent 6,352 of the 106,755 commercial weighing and measuring devices being inspected. Further reductions in this area of inspection would adversely affect operational costs and efficiencies.

Of the 106,755 commercial weighing and measuring devices 100,403 are classified as small capacity. The remaining 12.0 FTE positions are assigned to inspection of these devices as well as to inspection activities related to testing the accuracy of point-of-sales systems, verifying the accuracy of packaged commodities, enforcement of advertising and method of sale requirements, auditing sales activities, and the investigation of consumer complaints. Reductions will be necessary in these inspection areas to allow for additional device inspection activities. By reducing inspection activities for point-of-sales systems, packaged commodities, and consumer complaint investigation by 50 percent and equally dividing device inspections among the 12.0 FTE inspectors, approximately 36,000 devices would be inspected annually. At this rate, if inspectors perform only first-test inspections with no re-inspection of rejected devices it will require a minimum of 2.75 years to test all devices once. However, of all first-test inspections an expected 20 percent of the devices inspected would be rejected and would require re-inspection. Therefore, our best projection for completing a full statewide inspection cycle is approximately 3.5 years. These estimates assume zero-growth in the number of devices and the continuation of a funding level based on a \$4.00 fee.

## **Weights and Measures Program Options**

The group identified and discussed several options for maintaining and operating the program.

### **1. Random Sampling in lieu of Full Inspection**

The use of a statistical sampling protocol would reduce the overall workload involved in Weights and Measures activities. An approach of this type would involve 100-percent inspection of all equipment for compliance of applicable specifications. A statistically based sampling protocol would be used for selective measurement testing. In order to achieve a 95-percent level of confidence the following procedures would be used:

1. Test all devices at locations with two or less devices;
2. Random testing of 50percent of devices at locations having three to six devices; and
3. Random testing of 15percent of devices at locations having seven or more devices.

An approach of this type will allow for a greater presence of our inspection staff in business locations. Unfortunately, this approach will place greater emphasis on smaller business

operations and does not assure that any one specific device will be inspected within a specified period of time. Using this approach it is highly likely that a significant number of devices will never be tested during the expected lifespan of the device.

This approach would not be suitable for implementation with all areas of device inspection. Due to the large number of businesses using only one large capacity device, the continuation of 100-percent testing for large capacity meters and scales would be continued. Due to the specialized nature of work and equipment use in the testing of large capacity scales and meters, 8.0 FTE positions would continue to perform this type of inspection activity. These devices represent 6,352 of the 106,755 commercial weighing and measuring devices being inspected. The remaining 12.0 FTE positions would address the random inspection of these devices as well as inspection activities related to testing the accuracy of point-of-sales systems, verifying the accuracy of packaged commodities, enforcing advertising and method of sale requirements, auditing sales activities, and the investigation of consumer complaints.

## **2. Contract Services**

The Commonwealth could pursue contracting with private vendors to perform the inspections currently conducted by the Weights and Measures Program. In some manner the cost of contracts would be assessed upon business owners. The cost of this type of program is expected to exceed the cost currently charged to device owners in the form of registration fees. However, the use of private vendors may achieve a savings through the use of long-term contracts that would allow the vendor to recoup expenses associated with the purchase of specialized inspection equipment.

Staffing levels would depend upon the level of surveillance the State wishes to retain over these contractors. In theory the Weights and Measures Program could be reduced to a staff for monitoring contract compliance. A small representative field staff (less than the 20.0 FTE positions previously discussed) could be retained for verification inspections performed on devices previously inspected by contractors and investigate consumer complaints.

## **3. Independent Third-Party Inspection**

An inspection program of this type would be similar to the activities currently provided by the Weights and Measures Program. Through *Code* amendments Weights and Measures device owners could be required to have inspection performed by an independent third-party employed for the sole purpose of inspecting and testing the device and would not be allowed to perform repairs or calibrations. The cost of the inspection would be the responsibility of the device owner. The Weights and Measure program would be reduced to a minimal staff of approximately 20.0 FTE positions that would be involved in the general oversight of the third-party contractors, providing training to these contractors, performing verification inspections on devices previously inspected by third-party contractors, and investigating consumer complaints. The cost of this type of program is expected to exceed the cost currently charged to device owners in the form of registration fees. However, the use of third-party contractors would help reduce the possibility of device owners exerting undue influence on the activities of the contractor.

#### **4. Self Certification/Random Verification**

The Weights and Measures Program could develop a program of training private company employees to perform inspections similar to those performed by the State program. Through *Code* amendments Weights and Measures device owners could be required to have inspection performed by employees or independent third-parties employed for the sole purpose of inspecting and testing the device. All associated costs of the inspection would be the responsibility of the device owner. This approach would be subject to conflict of interest situations involving the employer/employee relationship. The Weights and Measures program would be reduced to a minimal staff of approximately 20.0 FTE positions that would be involved in the general oversight of the third-party contractors, providing training to these contractors, performing verification inspections on devices previously inspected by third-party contractors, and investigating consumer complaints. The cost of this type of program will vary among businesses as an economy of scale can be achieved by larger operations. However, small business owners would have to rely upon the services of third-party contractors. As previously stated, it is expected that third-party inspections would exceed the cost currently charged to device owners in the form of registration fees.

#### **5. Expand Authority Extended to Weights and Measures Service Technicians**

Currently, the Weights and Measures Program dedicates between 10 to 25 percent of inspection efforts to the re-inspection of rejected devices. The amount of time varies according to device type. For example, retail gasoline dispensers require re-inspection efforts are equal to 11.6percent of the total time invested in the inspection of all retail gasoline dispensers. Likewise, vehicle scales and fuel oil truck meters require re-inspection efforts are equal to 24percent of the total time involved in the testing of this device type.

By eliminating the re-inspection of rejected devices and foregoing the initial inspection of newly installed equipment the Weights and Measures Program could achieve resource savings that could be directed to routine inspections. The Weights and Measures program would be reduced to a minimal staff of approximately 20.0 FTE positions that would be involved in the routine inspections, investigation of consumer complaints, and general oversight of inspections performed by Weights and Measures service agencies and their technicians.

It is not known if this strategy will allow for the completion of an annual inspection cycle. To provide the Commissioner some flexibility when faced with limited resources, this strategy would include both expanding the authority of Weights and Measures service technicians and removing the mandated twelve-month inspection frequency. If the program were to take this direction, it is expected that penalties for violations will increase. This tool will be used as a deterrent to Weights and Measures service technicians performing inadequate work or device owners failing to implement corrective actions.

#### **6. Mandate Local Government Weights and Measures Programs**

While the origin of the Weights and Measures Program can be traced back to colonial times, the program activities currently provided were not started until the late 1940s. Prior to that time the “Superintendent of Weights and Measures” served as the custodian of measurement within the Commonwealth. The actual inspection activities were the responsibility of each locality. It was



mandated that each locality employ a “weights and measures sealer” to conduct the required inspections. As technology advanced inspections required the use of specialized equipment. Due to the cost of this equipment the State program started the testing of large capacity scales in the late 1940’s. Within a few years the program was also involved in the inspection of large capacity meter inspections and by the mid-1950s, the State program began surveillance activities of package weights. It was during this time that the local Weights and Measures programs started relinquishing inspection responsibility to the State, citing the need to reduce the cost of local government. This trend continued ending with the final local program in the City of Virginia Beach discontinuing operations May 2003.

Such a strategy would again place the responsibility for Weights and Measures inspections at the locality level. Following mandates used by the State of New York, localities would be required to provide for Weights and Measures inspections or contract with the State’s Weights and Measures Program for services within their jurisdiction. The cost of such a program would be the responsibility of the locality and be recouped by registration fees, general taxation, or inspection fees.

This approach does create a major obstacle for businesses operating in multiple localities. As the number of individually managed programs increase, the uniformity among all programs will decrease. Therefore, some level of State surveillance of localities would be necessary. Staffing levels of the State’s Weights and Measures Program would depend upon the number of localities contracting with the State and the level of surveillance the State wishes to maintain over localities. In theory the Weights and Measures Program could be reduced to a staff for monitoring compliance. A small representative field staff (less than the 20.0 FTE positions previously discussed) could be retained for verification inspections performed on devices previously inspected by local Weights and Measures inspectors.

## **7. Funding Weights and Measures Program Through A Variable Rate Fee Schedule**

The work group considered the scenario of a fee schedule based on the recovery of actual costs for activity performed. While the members of the committee recognized the merit of such an approach, several other factors could not be accounted for in the development of a fee schedule. Industry representatives recognized the need for adjustments incorporating savings achieved through the economy of scale (businesses with more devices required fewer resources due to reduced travel). While correct, this concept places a greater burden on the small business operator. Therefore, it was the consensus of the work group that a fee for devices, whether a flat fee or one graduated according to the recovery of actual cost, would entail considerable administrative costs if implemented fairly.

The work group also considered scenarios of funding inspection activities through increased fees assessed only for re-inspection activities and the increased use of civil penalties for violations, as a large portion of the Weights and Measures inspection activities involves the re-inspection of previously inspected (and rejected for violations) equipment. While this approach may help offset operational cost, the level of anticipated revenue would not fully fund the Weights and Measures Program. Likewise, the assessment of civil penalties for certain types of violations has proven to be a valuable enforcement tool. However, it would be impossible to fund this activity solely on the assessment of penalties.

## **Findings**

The Weights and Measures Program benefits Virginia's businesses and consumers alike.

Nearly 107,000 weighing and measuring devices of various types are subject to inspection in Virginia.

Seventy-five percent of the states that responded to a national survey (30/40) reported they have either a registration fee or licensing fee for weighing and measuring devices.

Businesses believe the Commonwealth's Weights and Measures Program should be supported by general fund tax dollars.

Given the uncertain fiscal climate of the past few years and a reluctance to create ongoing general fund obligations for future budgetary cycles, general funds have been reduced and are limited for the operation and support of the Virginia Weights and Measures Program.

## **Recommendations**

Weights and Measures regulation is an important function of government. Therefore, VDACS recommends that this program continue to provide the level of protection that can be supported through available funding. Realizing that general funds are limited due to continuing fiscal challenges and that industry does not support the funding of this program through increases in fees, VDACS recommends the continuation of the \$4.00 per device fee, expansion of authority extended to Weights and Measures Service Technicians, and removal of the mandated twelve-month inspection interval in order to continue the program. This combination of utilizing the existing revenue source and efficiencies in the operation of the Weights and Measures Program is the most viable option for serving business and consumers at this level of funding.

## **Legislation to Implement this Plan**

VDACS has proposed legislation to implement the recommendation. (Appendix A)

## **References**

<sup>1</sup>National Conference on Weights and Measures, 2003, "Survey of Inspection Statistics Collected by State Weights and Measures Programs," Gaithersburg, MD

**§ 3.1-928. Testing and inspection of weights and measures offered for sale or commercially used.**

When not otherwise provided by law, the Commissioner shall have the power to inspect and test, to ascertain if they are correct, all weights and measures kept, offered, or exposed for sale. It shall be the duty of the Commissioner, ~~within a twelve month period, or less frequently if in accordance with a schedule issued by the Board, and as much oftener as he may deem necessary,~~ to inspect and test *on a periodic basis as he deems necessary*, to ascertain if they are correct, all weights and measures commercially used (i) in determining the weight, measurement, or count of commodities or things sold, or offered or exposed for sale, on the basis of weight, measure, or of count or (ii) in computing the basic charge or payment for services rendered on the basis of weight, measure, or count. However, with respect to any single-service devices and any uniformly mass-produced devices, a test may be made on representative samples of such devices; and any lot of which such samples are representative shall be held to be correct or incorrect upon the basis of the results of the inspections and tests on such samples. As used in this chapter, "single-service devices" means any devices designed to be used commercially once and then discarded. "Uniformly mass-produced devices" includes, but is not limited to, any devices made by means of a mold or die, and not susceptible to individual adjustment.

**§ 3.1-969.10. Service of weights and measures; repair.**

A. Any registered service agency or any certified service technician in the employ of the service agency may: (i) place into service, subject to an *random* official inspection, a new or used weight or measure and (ii) following corrective repair, remove any rejection tag or condemnation tag and return the weight or measure to service, ~~subject to an official inspection.~~

B. A service agency or service technician in the employ of the service agency exercising authority under subsection A of this section shall adjust any weight or measure governed by subsection A as closely as practicable to zero error. (1992, c. 242.)

**§ 3.1-969.12. Service report.**

Every service agency shall furnish each service technician in its employ with a supply of report forms entitled "Placed into Service Report" prescribed by the Commissioner. Within forty-eight hours after its service technician has placed in or restored to service a weight or measure, the service agency shall provide to the Commissioner a fully executed Placed into Service Report, together with any rejection tag or condemnation tag removed from the weight or measure. The service agency shall provide a copy of the fully executed Placed into Service Report to the owner or operator of the weight or measure and shall retain for a period of one year, reckoned from the date of execution, a copy of the fully executed Placed into Service Report, which is subject to inspection by the Commissioner. *The Commissioner may accept the Placed into Service Report as sufficient to meet the statutory testing and inspection requirements in §3.1-928.* (1992, c. 242.)

**Definition of Device Type**

**Petroleum Dispensers** – A device designed for the measurement and delivery of liquids used as fuel for internal-combustion engines. Normal single deliveries of less than 50 gallons.

**Truck Stop Dispensers** – A device designed for the measurement and delivery of liquids used as fuel for internal-combustion engines. Normal single deliveries of 50 gallons or more.

**Taxi Meters** – A device that automatically calculates, at a predetermined rate or rates, and indicates the charge for hire of a vehicle.

**Moisture Machines** – A device that indicates either directly or through the use of conversion tables and/or correction tables the moisture content of grains and seeds.

**Vehicle Tank Meters** – A meter mounted on a vehicle tank including those used for the measurement and delivery of petroleum products or agri-chemical liquids such as fertilizers, feeds, pesticides, and bulk deliveries of water.

**Bulk Plant Meters** – A device capable of delivering liquid products at a high rate of volume per minute.

**Liquefied Petroleum Gas Meters** – A system including a mechanism or machine of the meter type designed to measure and deliver liquefied petroleum gas in the liquid state by a definite quantity, whether installed in a permanent location or mounted on a vehicle.

**Computing/Hanging/Counter/Platform Scales** – A device with a low nominal rated capacity used in the majority of direct retail sales transactions.

**Warehouse Scales** – A device usually having a nominal rated capacity greater than 5,000 pounds which is permanently mounted in the floor where located.

**Vehicle Scales** – A scale adapted to weighing highway, farm, or other large industrial vehicles loaded or unloaded.

**Hopper Scales** – A scale designed for weighing bulk commodities whose load-receiving element is a tank, box, or hopper mounted on a weighing element.

**Livestock Scales** – A scale equipped with stock racks, gates, and other adaptations for weighing livestock standing on the scale platform.

**Monorail Scales** - A device used to weigh livestock carcasses that may be used as a static or dynamic indicator, mounted on a truck and tree assembly that travels on a monorail system.

**Railroad Scales** - A device used to weigh railroad cars that may be used as a static or dynamic indicator.

**Analytical Balance** – A device used for precision measurements with a value of the verification scale division equal to or greater than 5 grams, and having at least 100 scale divisions, however no more than 1,200 scale divisions.

**Belt Conveyor Scales** – A device that employs a weighing element in contact with a belt to sense the weight of the material being conveyed and the speed (travel) of the material, and integrates these values to produce the total delivered weight.

**Crane Scales** – A device with a nominal capacity of 5,000 pounds or more designed to weigh loads while suspended freely from an overhead, track-mounted crane.

**Vehicle On-Board Weighing System** – A weighing system designed as an integral part of or attached to the frame, chassis, lifting mechanism, or bed of a vehicle, trailer, industrial truck, industrial tractor, or forklift truck.

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