

SUBJECT 9

Re: Pads, Padding and Related Articles Group

Contact: Adam C. Mercer Telephone — (703) 838-1911 mercer@nmfta.org

Proponent: Freight Classification Development Council

Present Classification Provisions

Item	Description	Class
149020	PADS, PADDING AND RELATED ARTICLES GROUP: subject to item 149000 Batting, Batts, Pads, Padding, Wads or Wadding , consisting of cotton fibers or consisting predominantly by weight of cotton fibers, see Note, item 149021, not exceeding 1 inch in thickness, see Note, item 149022, in packages.....	125
149021	NOTE—The term 'cotton' as used herein refers to cotton fiber in any of its forms, such as cotton linters, cotton waste, cotton motes or cotton card sweepings.	
149022	NOTE—Will also apply when: Glazed or having a surface binder; Backed or faced with paper, paperboard or cellulose or plastic film; Backed or faced with open-mesh fabric such as cheesecloth; Stitched with stitches not closer than 3 inches. Will not apply when: Backed or faced with fabrics other than open-mesh fabrics or material other than paper, paperboard or cellulose or plastic film; Of knitted or woven construction.	
149030*	Batting, Batts, Wadding or Mattress Felt or Padding , NOI, cotton, jute or sisal, see Note, item 149031, subject to Item 170:	
Sub 1	In bags or boxes, or in bales not compressed or bales compressed to less than 6 pounds per cubic foot	200
Sub 2	In bales compressed to 6 pounds per cubic foot but less than 12 pounds per cubic foot.....	100
Sub 3	In bales compressed to 12 pounds or greater per cubic foot.....	85
149031	NOTE—Will not apply on finished pads nor on material which is knitted, quilted or stitched.	
149080	Cloths or Mats or Cloth or Matting , filter press:	
Sub 1	Cotton, in bales or boxes	70
Sub 2	Hair or wool, new or used, not worn-out, in bags, bales or boxes.....	85
Sub 3	NOI, in bales or boxes.....	100

*Published in Supplement 1 to NMF 100-AV, effective April 9, 2022.

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Present Classification Provisions — Continued

Item	Description	Class
	PADS, PADDING AND RELATED ARTICLES GROUP: subject to item 149000	
149200	Mats or Matting , glass fiber or glass wool, not woven, with or without binder, other than insulating mats or matting and other than air filtering media, in packages, subject to Item 170 and having a density in pounds per cubic foot of:	
Sub 1	Less than 1	400
Sub 2	1 but less than 2	300
Sub 3	2 but less than 4	250
Sub 4	4 but less than 6	175
Sub 5	6 but less than 8	125
Sub 6	8 but less than 10	100
Sub 7	10 but less than 12	92.5
Sub 8	12 but less than 15	85
Sub 9	15 but less than 22.5	70
Sub 10	22.5 but less than 30	65
Sub 11	30 or greater	60
149220	Mats or Pads , stove or table, heat resistant, solid fiberboard, or fiberboard combined with metal or foil, in boxes.....	77.5
149225	Pads , cotton, with or without backing or facing of unwoven fiber, cut to specific size for insertion in jewelry boxes (Jewelers' Cotton), in boxes.....	250
149230	Pads , stove or table, NOI, in boxes	85
149250	Pads or Cushions , packing:	
149255	Chipboard, Fiberboard, Paper, Paperboard or Pulpboard , indented, in packages:	
Sub 1	Not wrapped in paper sleeves, with or without Kraft-paper facing or backing.....	125
Sub 2	Wrapped in paper sleeves.....	100
149260	Plastic Film , honeycombed with integrally formed cups or blisters, or laminated to form air-filled cells, including Bubble Wrap , see Note, item 149261, in boxes or bundles, subject to Item 170 and having a density in pounds per cubic foot of:	
Sub 1	Less than 2	400
Sub 2	2 or greater.....	250
149261	NOTE—Applies on packing pads or cushions in the form of sheets or continuous lengths. Also applies on Bags, Packets, Pouches or Sleeves intended for use as inner packaging material.	
149263	Rubber or Rubber Composition , other than foam rubber, in boxes.....	85

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Present Classification Provisions — Concluded

Item	Description	Class
149265	<p>PADS, PADDING AND RELATED ARTICLES GROUP: subject to item 149000</p> <p>Pads, Padding, Cushions or Pillows, see Note, item 149269, viz.:</p> <p>Berms, spill containment;</p> <p>Booms, Pads, Sweeps or Other Forms or Shapes, chemical or oil absorption;</p> <p>Cushions, aircraft seat or railway car seat;</p> <p>Cushions, automotive safety restraint system, cloth (Air Bag Inflator Cushions);</p> <p>Cushions, NOI;</p> <p>Excelsior, NOI; or Shredded Paper Packing Material;</p> <p>Futons;</p> <p>Packing Material, loosefill, NOI, including Packing Peanuts, Pellets, Disks or Other Forms or Shapes;</p> <p>Pads, mattress;</p> <p>Pads or Cushions, packing; excelsior, grass, hay, straw or shredded or macerated paper;</p> <p>Pads or Padding, NOI;</p> <p>Pillows or Pillow Forms (Unfinished Pillows), NOI;</p> <p>Seat Backs, railway car, upholstered or padded;</p> <p>In packages, subject to Item 170 and having a density in pounds per cubic foot of:</p>	
Sub 1	Less than 1	400
Sub 2	1 but less than 2.....	300
Sub 3	2 but less than 4.....	250
Sub 4	4 but less than 6.....	175
Sub 5	6 but less than 8.....	125
Sub 6	8 but less than 10.....	100
Sub 7	10 but less than 12.....	92.5
Sub 8	12 but less than 15.....	85
Sub 9	15 but less than 22.5.....	70
Sub 10	22.5 but less than 30.....	65
Sub 11	30 or greater.....	60
149269	<p>NOTE—Does not apply on polypropylene in sheet form, polyethylene in sheet form or polystyrene in sheet form when the packaged density as shipped is less than one pound per cubic foot. Such articles are classified in item 157463.</p>	
149270	<p>Pads, Padding, Wads or Wadding, creped paper, wood fiber, or cellulose other than synthetic fibers, with or without backing or facing of other materials, see Note, item 149271, in sheets or rolls, in packages</p>	175
149271	<p>NOTE—Provisions do not apply on meat, fish or poultry fluid absorbency pads or padding. For classes applicable to these pads, see item 149265.</p>	

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Proposed Classification Provisions

Item	Description	Class
	PADS, PADDING AND RELATED ARTICLES GROUP: subject to item 149000	
149020	Batting, Batts, Pads, Padding, Wads or Wadding , consisting of cotton fibers or consisting predominantly by weight of cotton fibers, see Note, item 149021, not exceeding 1 inch in thickness, see Note, item 149022, etc	⇒Cancel; see item 149265
149021	NOTE—⇒Cancel; no further application.	
149022	NOTE—⇒Cancel; no further application.	
149030	Batting, Batts, Wadding or Mattress Felt or Padding , NOI, cotton, jute or sisal, see Note, item 149031, etc	⇒Cancel; see item 149265
149031	NOTE—⇒Cancel; no further application.	
149080	Cloths or Mats or Cloth or Matting , filter press, etc	⇒Cancel; see item 149265
149200	Mats or Matting , glass fiber or glass wool, not woven, with or without binder, other than insulating mats or matting and other than air filtering media, etc	⇒Cancel; see item 149265
149220	Mats or Pads , stove or table, heat resistant, solid fiberboard, or fiberboard combined with metal or foil, etc	⇒Cancel; see item 149265
149225	Pads , cotton, with or without backing or facing of unwoven fiber, cut to specific size for insertion in jewelry boxes (Jewelers' Cotton), etc	⇒Cancel; see item 149265
149230	Pads , stove or table, NOI, etc	⇒Cancel; see item 149265
149250	Pads or Cushions , packing:	⇒Cancel; no further application
149255	Chipboard, Fiberboard, Paper, Paperboard or Pulpboard , indented, etc	⇒Cancel; see item 149265
149260	Plastic Film , honeycombed with integrally formed cups or blisters, or laminated to form air-filled cells, including Bubble Wrap , see Note, item 149261, etc	⇒Cancel; see item 149265
149261	NOTE—⇒Cancel; no further application.	
149263	Rubber or Rubber Composition , other than foam rubber, etc ...	⇒Cancel; see item 149265

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Proposed Classification Provisions — Continued

Item	Description	Class
149265	<p>PADS, PADDING AND RELATED ARTICLES GROUP: subject to item 149000</p> <p>Pads, Padding, Cushions or Pillows, see Note, item 149269, viz.:</p> <p>⇒Batts or Batting, NOI;</p> <p>Berms, spill containment;</p> <p>Booms, Pads, Sweeps or Other Forms or Shapes, chemical or oil absorption;</p> <p>Cushions, aircraft seat or railway car seat;</p> <p>Cushions, automotive safety restraint system, cloth (Air Bag Inflator Cushions);</p> <p>Cushions, NOI;</p> <p>Excelsior, NOI; or Shredded Paper Packing Material;</p> <p>Futons;</p> <p>⇒Mats or Matting, NOI;</p> <p>Packing Material, loosefill, NOI, including Packing Peanuts, Pellets, Disks or Other Forms or Shapes;</p> <p>Pads, mattress;</p> <p>⇒Pads or Cushions, packing, NOI, including Bubble Wrap, see Note, item NEW;</p> <p>Pads or Padding, NOI;</p> <p>⇒Pads, stove or table, NOI;</p> <p>Pillows or Pillow Forms (Unfinished Pillows), NOI;</p> <p>Seat Backs, railway car, upholstered or padded;</p> <p>⇒Wads or Wadding, NOI;</p>	
	<p>In packages, subject to Item 170 and having a density in pounds per cubic foot of:</p>	
Sub 1	Less than 1 400	
Sub 2	1 but less than 2..... 300	
Sub 3	2 but less than 4..... 250	
Sub 4	4 but less than 6..... 175	
Sub 5	6 but less than 8..... 125	
Sub 6	8 but less than 10..... 100	
Sub 7	10 but less than 12..... 92.5	
Sub 8	12 but less than 15..... 85	
Sub 9	15 but less than 22.5..... 70	
Sub 10	22.5 but less than 30..... 65	
Sub 11	30 or greater..... 60	
149269	<p>NOTE—Does not apply on polypropylene in sheet form, polyethylene in sheet form or polystyrene in sheet form when the packaged density as shipped is less than one pound per cubic foot. Such articles are classified in item 157463.</p>	
⇒NEW	<p>NOTE—Also applies on Bags, Packets, Pouches or Sleeves for use as inner packaging material.</p>	

SUBJECT 9

Proposed Classification Provisions — Concluded

Item	Description	Class
149270	<p>PADS, PADDING AND RELATED ARTICLES GROUP: subject to item 149000</p> <p>Pads, Padding, Wads or Wadding, creped paper, wood fiber, or cellulose other than synthetic fibers, with or without backing or facing of other materials, see Note, item 149271, in sheets or rolls, etc</p>	⇒Cancel; see item 149265
149271	NOTE—⇒Cancel; no further application.	

Analysis

Introduction

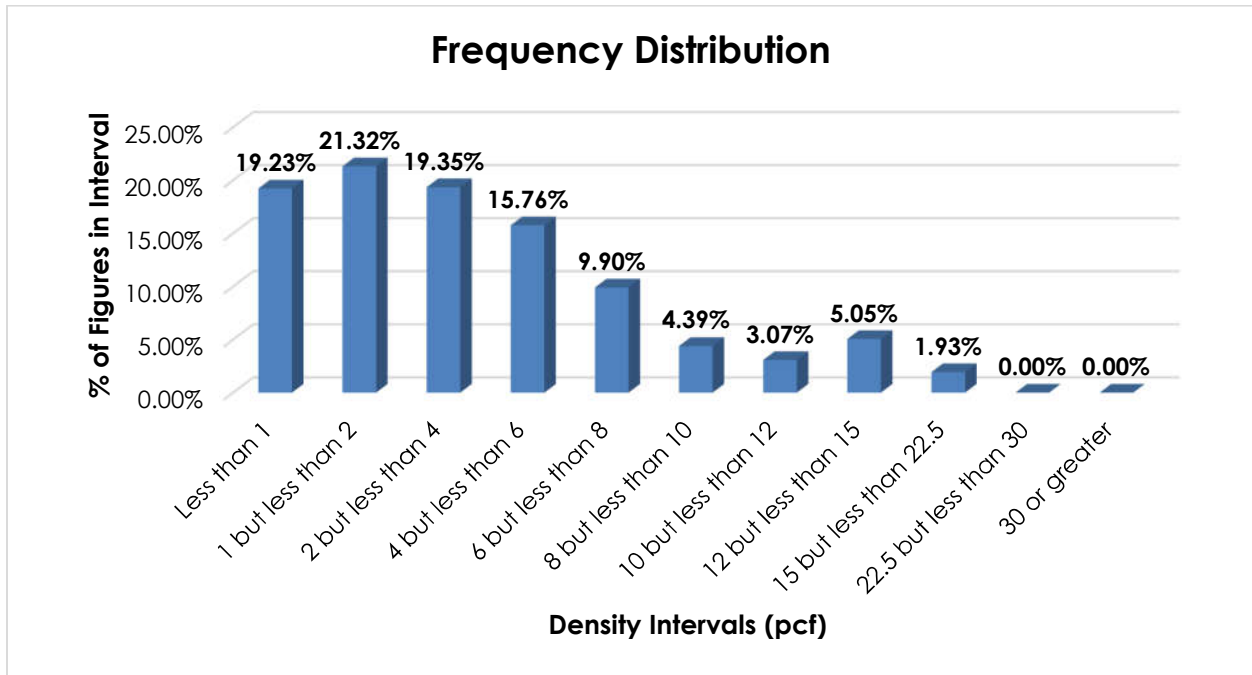
There are numerous items subject to the Pads, Padding and Related Articles Group, item 149000, that name particular types of pads or padding, and these provisions can be difficult to interpret, apply or verify. Moreover, the involved commodities exhibit a wide range of densities. The transportation characteristics below relate to items 149020, 149030, 149080, 149200, 149220, 149225, 149230, 149255, 149260, 149263 and 149270, as shown in the Present Classification Provisions herein.

Transportation Characteristics

Density—The information of record includes 13,220 density observations obtained from the FCDC’s Density Study¹. The densities range from 0.10 to 19.70 pcf, with an overall average density of 4.18 pcf. As shown in the graph on the following page, the density distribution is right-skewed with figures distributed throughout the range.

¹ The Density Study is part of an ongoing effort by the FCDC to collect information on actual shipments across all product categories handled by the LTL industry. Carriers that choose to participate in the Study periodically submit shipment data captured through their respective freight auditing programs. The FCDC uses verifiable data points, identified by NMFC item, that include the weight and the dimensions and/or cube of the shipping unit.

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Handling, Stowability and Liability—There have been no reports of unusual or significant handling, stowability or liability concerns.

Conclusion

Based on the foregoing analysis, items 149020, 149030, 149080, 149200, 149220, 149225, 149230, 149255, 149260, 149263 and 149270 would be canceled with reference to the full-scale, density-based provisions of item 149265².

Notes, items 149021, 149022, 149031, 149261 and 149271 would be canceled as having no further application, as would item 149250.

Concurrently, in the interest of clarification, this proposal would amend the “viz.” listing in item 149265 to include: “Batts or Batting, NOI,” “Mats or Matting, NOI,” “Pads or Cushions, packing, NOI, including Bubble Wrap,” “Pads, stove or table, NOI,” and “Wads or Wadding, NOI.”

A new attendant Note would be established to clarify the application of item 149265.

² Item 149265 provides the FCDC’s standard 11-subprovision density scale, which includes reference to Item (Rule) 170, the inadvertence clause.