

SUBJECT 5

Re: Railings, NOI — Item 35255

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Proponent: Safety Rail Company, Spring Park, Minnesota

Present Classification Provisions

Item	Description	Class
	BUILDING MATERIALS, MISCELLANEOUS, GROUP: subject to item 33570	
35255	Railings , NOI, in boxes or crates, 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

Proposed Classification Provisions

Item	Description	Class
	BUILDING MATERIALS, MISCELLANEOUS, GROUP: subject to item 33570	
⇒35255	Railings , NOI:	
Sub 1	In boxes or crates, subject to Item 170 and having a density in pounds per cubic foot of:	
Sub 2	Less than 5	250
Sub 3	5 but less than 10	125
Sub 4	10 but less than 15	85
Sub 5	15 but less than 22.5.....	70
Sub 6	22.5 or greater.....	60
Sub 7	In packages other than boxes or crates, see Note, item NEW, subject to Item 170 and having a density in pounds per cubic foot of:	
Sub 8	Less than 5	300
Sub 9	5 but less than 10	150
Sub 10	10 but less than 15	92.5
Sub 11	15 but less than 22.5.....	77.5
Sub 12	22.5 or greater.....	65

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Proposed Classification Provisions — Concluded

Item	Description	Class
⇒NEW	NOTE—Articles tendered for shipment on lift truck skids, pallets or platforms must be securely fastened to and must not overhang the edges of the lift truck skid, pallet or platform deck. Exposed surfaces and edges must be completely wrapped with plastic film or corrugated fiberboard or protected by wood or similar material.	

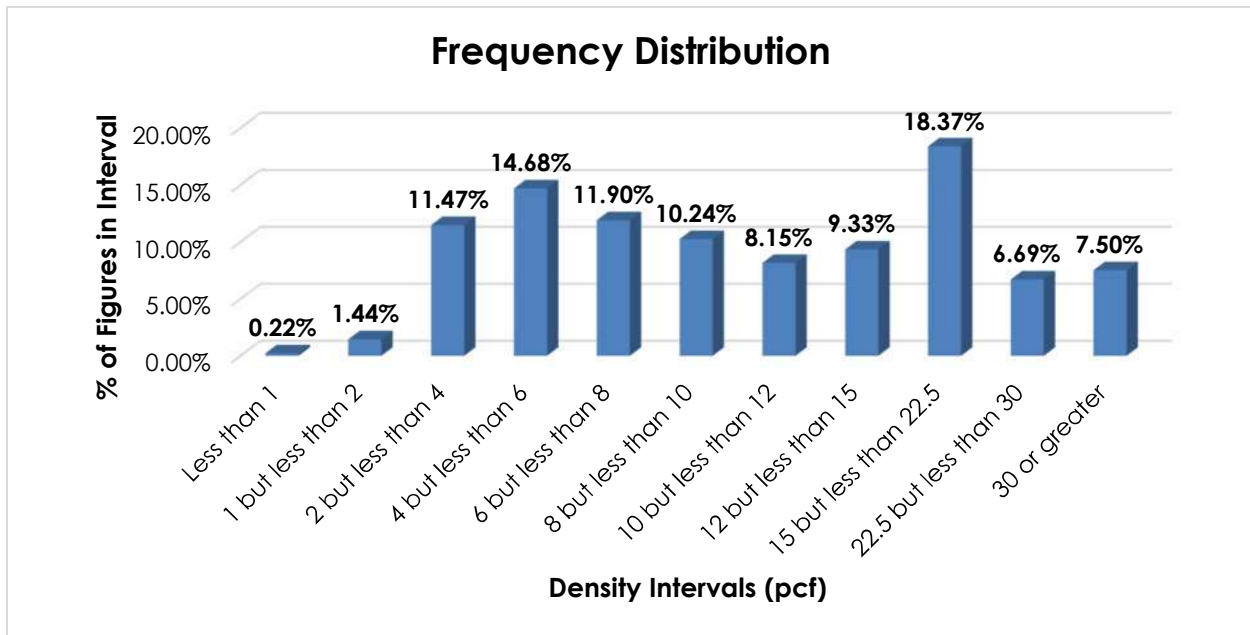
Analysis

Introduction

This proposal was submitted by Safety Rail Company of Spring Park, Minnesota. The proponent ships their railings secured on lift truck skids or pallets without being boxed or crated, which is not currently authorized in item 35255, as shown in the Present Classification Provisions herein.

Transportation Characteristics

Density—The information of record includes 22,286 density observations obtained from the FCDC’s Density Study¹. The densities range from 0.25 to 58.62 pcf, with an overall average density of 13.15 pcf. As shown in the graph below, the densities are 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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When the data is evaluated based on the proposed density breaks at 5, 10, 15 and 22.5 pcf, the density ranges and averages shown in the table below emerge.

Density Group (pcf)	Density Range (pcf)	Average Density (pcf)
Less than 5	0.25 – 4.99	3.52
5 but less than 10	5.00 – 9.99	7.31
10 but less than 15	10.00 – 14.99	12.26
15 but less than 22.5	15.00 – 22.49	18.83
22.5 or greater	22.50 – 58.62	33.05

Handling—Railings may be shipped in boxes or crates, or in packages other than boxes or crates. Articles shipped in boxes or crates will generally not present unusual or significant handling considerations.

As shown in the photos, the proponent straps their railings in a vertical orientation on lift truck skids or pallets without being boxed or crated. When tendered in packages that provide minimal exterior protection, additional care must be taken when handling the freight so as to avoid damaging the products.



Stowability—When railings are tendered in boxes or crates, a flat load-bearing surface will generally be present, which would allow for other freight to be loaded on top of the handling unit. There will typically be lateral support for adjacent freight as well.

When railings are tendered in packages other than boxes or crates, a regular load-bearing surface for top freight or lateral support for adjacent freight may not be present. This can result in increased time and effort on the part of the carrier to properly structure the vehicle load so as to mitigate the chance of damage to the products or to other freight with which stowed.

Liability—As is the case with most general commodities, when tendered for shipment fully enclosed within boxes or crates, railings should not be unusually susceptible to damage nor likely to damage other freight. However, when tendered in packages other than boxes or crates, railings exhibit greater susceptibility to damage.

Conclusion

Based on the foregoing analysis, this proposal would amend item 35255 to provide classes predicated on packaging and density, with breaks at 5, 10, 15 and 22.5 pcf². The table on the following page relates the information of record to the proposed density groupings and FCDC guidelines for the proposed classes when tendered in boxes or crates, and a one-class adjustment from the density guidelines when the articles are tendered in packages other than boxes or crates to reflect the identified negative handling, stowability and liability characteristics.

² The density provisions would include reference to Item (Rule) 170, the inadvertence clause.

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Density Group (pcf)	Average Density (pcf)	FCDC Minimum Average Density Guideline (pcf)	Class Based on FCDC Density Guidelines	Class Adjustment Based on Handling, Stowability and Liability Considerations
Less than 5	3.52	3	250	300
5 but less than 10	7.31	7	125	150
10 but less than 15	12.26	12	85	92.5
15 but less than 22.5	18.83	15	70	77.5
22.5 or greater	33.05	30	60	65

Furthermore, a new Note would be established to provide additional packaging requirements for railings tendered in packages other than boxes or crates.