

SUBJECT 8

Re: Roof Gutters, Eavestroughs or Downspouts, or Fittings therefor

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Proponent: Freight Classification Development Council

Present Classification Provisions

Item	Description	Class
	BUILDING METALWORK GROUP: subject to item 35600	
35932	NOTE—When in shipments of 24,000 pounds or more, provisions include accompanying equipment of hangers.	
36180	Conductor Pipe (Downspout), Conductor Pipe (Downspout) Cutoffs, Elbows, NOI, Funnels or Shoes; aluminum; in boxes.....	200
36190	Conductor Pipe (Downspout), Conductor Pipe (Downspout) Cutoffs, Elbows, Funnels or Shoes; copper, lead or zinc, see Note, item 35932; in boxes or crates:	
Sub 1	Not nested.....	150
Sub 2	Nested, see Note, item 36192.....	100
36192	NOTE—Item 110, Sec. 13 will govern, except the words 'two or more' may be substituted for 'three or more.'	
36210	Conductor Pipe (Downspout), Conductor Pipe (Downspout) Cutoffs, Elbows, Funnels or Shoes; iron, steel or tin plate, see Note, item 35932; in boxes or crates or in slatted bundles, see Note, item 36212:	
Sub 1	Not nested.....	125
Sub 2	Nested, see Note, item 36192.....	85
36212	NOTE—Also applies when center and ends are protected by fiberboard secured with steel straps; end caps slotted with steel straps passing through slots and extending length of pipe.	
36220	Conductor Pipe Boots or Connections, cast iron.....	70
36410	Eave Troughs; Roof Gutters; or Eave Trough or Roof Gutter End Caps, End Pieces, Mitres (Corners), Outlets, Slip Joint Connectors or Fittings, NOI; see Note, item 35932:	
Sub 1	Aluminum, in boxes or crates:	
Sub 2	Not nested.....	150
Sub 3	Nested	85
Sub 4	Copper, lead or zinc, in boxes or crates:	
Sub 5	Not nested.....	100
Sub 6	Nested	85
Sub 7	Iron, steel or tin plate:	
Sub 8	Not nested, in boxes or crates	100
Sub 9	Nested, see Note, item 36411, in packages.....	77.5
36411	NOTE—Also applies on steel Downspouts contained within nested roof gutters.	
36450	Elbows, conductor pipe (downspout), cast aluminum, in boxes or crates.....	70

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Present Classification Provisions — Concluded

Item	Description	Class
	LUMBER GROUP: subject to item 112000	
112480	Eave Troughs or Gutters , roof, wooden, in the rough.....	60

Proposed Classification Provisions

Item	Description	Class
	BUILDING METALWORK GROUP: subject to item 35600	
35932	NOTE—No Change.	
36180	Conductor Pipe (Downspout), Conductor Pipe (Downspout) Cutoffs, Elbows, NOI, Funnels or Shoes; aluminum, etc ⇒Cancel; see item A-NEW	
36190	Conductor Pipe (Downspout), Conductor Pipe (Downspout) Cutoffs, Elbows, Funnels or Shoes; copper, lead or zinc, etc ⇒Cancel; see item A-NEW	
36192	NOTE—No Change.	
36210	Conductor Pipe (Downspout), Conductor Pipe (Downspout) Cutoffs, Elbows, Funnels or Shoes; iron, steel or tin plate, etc ⇒Cancel; see item A-NEW	
36212	NOTE—⇒Cancel; no further application.	
36220	Conductor Pipe Boots or Connections, cast iron ⇒Cancel; see item A-NEW	
36410	Eave Troughs; Roof Gutters; or Eave Trough or Roof Gutter End Caps, End Pieces, Mitres (Corners), Outlets, Slip Joint Connectors or Fittings, NOI, etc..... ⇒Cancel; see item A-NEW	
36411	NOTE—⇒Cancel; no further application.	
36450	Elbows, conductor pipe (downspout), cast aluminum, etc ⇒Cancel; see item A-NEW	

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Proposed Classification Provisions — Concluded

Item	Description	Class
	BUILDING METALWORK GROUP: subject to item 35600	
⇒A-NEW	Roof Gutters, Eavestroughs or Downspouts, or Fittings therefor, metal, in packages, see Note, item B-NEW:	
Sub 1	Greatest dimension exceeding 288 inches, subject to Item 170 and having a density in pounds per cubic foot of:	
Sub 2	Less than 5	500
Sub 3	5 but less than 10	250
Sub 4	10 or greater.....	110
Sub 5	Greatest dimension exceeding 192 inches but not exceeding 288 inches, subject to Item 170 and having a density in pounds per cubic foot of:	
Sub 6	Less than 5	400
Sub 7	5 but less than 10	200
Sub 8	10 or greater.....	100
Sub 9	Greatest dimension exceeding 96 inches but not exceeding 192 inches, subject to Item 170 and having a density in pounds per cubic foot of:	
Sub 10	Less than 5	300
Sub 11	5 but less than 10	175
Sub 12	10 or greater.....	92.5
Sub 13	Greatest dimension not exceeding 96 inches, subject to Item 170 and having a density in pounds per cubic foot of:	
Sub 14	Less than 5	250
Sub 15	5 but less than 10	150
Sub 16	10 or greater.....	85
⇒B-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.	
	LUMBER GROUP: subject to item 112000	
112480	Eave Troughs or Gutters, roof, wooden, in the rough.....	⇒Cancel; believed to be obsolete

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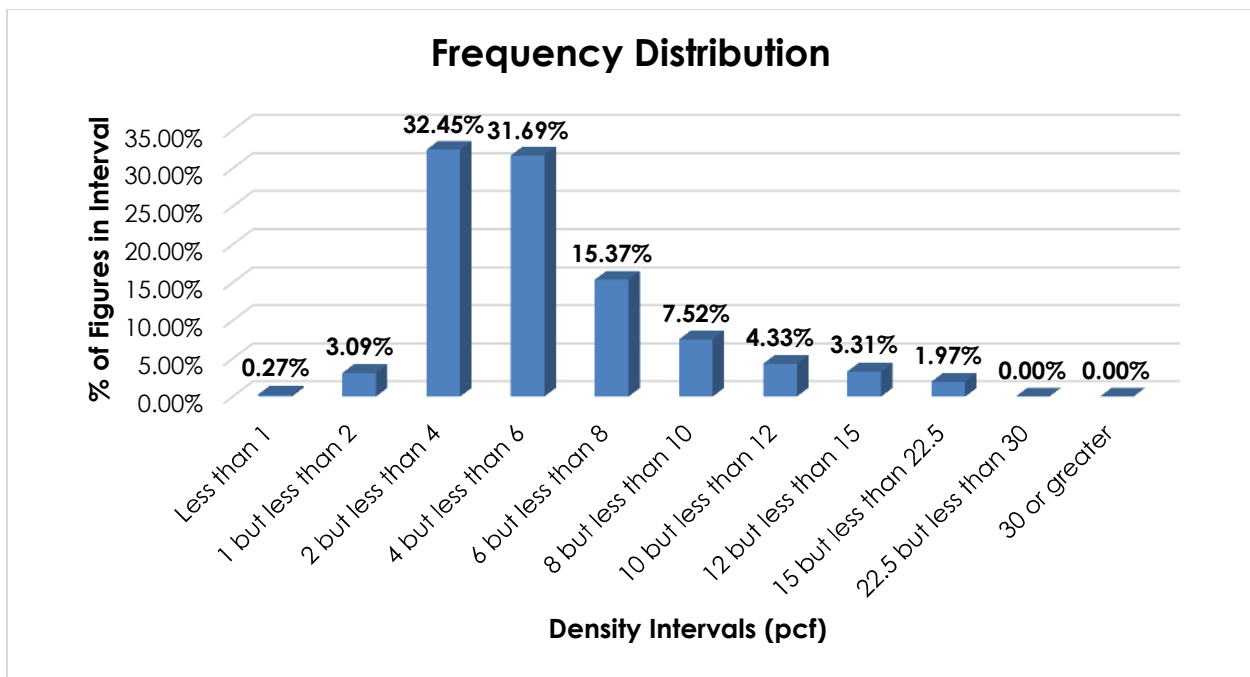
Analysis

Introduction

This proposal is based on the information developed through Research Project 1514, which was initiated to review the transportation characteristics of metal roof gutters or eavestroughs, or fittings therefor, as named in item 36410. During the course of research, the project was expanded to include items 36180, 36190, 36210, 36220, 36450 and 112480¹.

Transportation Characteristics

Density—The information of record includes 31,374 density observations submitted by carriers and obtained from the FCDC’s Density Study². The densities range from 0.20 to 21.50 pcf, with an overall average density of 5.57 pcf. As shown in the graph below, the density distribution is right-skewed, with almost 80% of the figures between 2 and 8 pcf.



When the data is evaluated based on the proposed density breaks at 5 and 10 pcf, the density ranges and averages shown in the table on the following page emerge.

¹ Item 112480 is believed to be obsolete and is not included in the data set for this proposal.

² 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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Density Group (pcf)	Density Range (pcf)	Average Density (pcf)
Less than 5	0.20 – 4.99	3.47
5 but less than 10	5.00 – 9.99	6.76
10 or greater	10.00 – 21.50	12.86

Handling—When not exceeding 96 inches in greatest dimension, the involved products may be tendered in boxes secured on lift truck skids or pallets, but as greatest dimension increases, the commodities are typically tendered in packages. When not exceeding 96 inches in greatest dimension, the involved articles do not appear to have any significant handling issues. However, these commodities vary greatly in size, and the data of record shows that numerous observations exceed 96 inches (8 feet) in greatest dimension³, with some exceeding 288 inches (24 feet). As greatest dimension increases, the handling into and out of the vehicle becomes considerably more difficult, and specialized equipment, or additional personnel, may be necessary to safely handle longer units. Furthermore, as greatest dimension increases, cross-dock operations can be significantly affected. Often there is not enough room at carrier facilities to safely or easily handle and maneuver excessively long handling units.

Stowability—When the involved articles do not exceed 96 inches in greatest dimension, they typically do not present significant or unusual stowability issues. Handling units exceeding 96 inches in greatest dimension are more difficult to stow with other general freight, particularly as they may lack a flat load-bearing surface for top freight. Due to the commodities' size and configuration, it may be difficult to stow adjacent freight. These factors reduce or complicate the carrier's ability to maximize vehicle utilization. These products may also have protrusions or edges that can potentially be damaged or damage adjacent freight. These factors can make it more difficult and time consuming for the carrier to properly structure the load. Furthermore, for the longest articles, the carrier will have to ensure that the freight will fit in the vehicle.

Liability—The involved articles are not perishable nor hazardous in nature. Shipments of these commodities not adequately protected by packaging materials, or that overhang the lift truck skid or pallet, are more liable to damage, such as bending, denting and scuffing. Also, if not properly stowed within the vehicle, they can potentially damage other freight.

Conclusion

Based on the foregoing analysis, this proposal would cancel items 36180, 36190, 36210, 36220, 36410 and 36450 with reference to a new item, naming “Roof Gutters, Eavestroughs or Downspouts, or Fittings therefor, metal,” and would provide classes predicated on greatest dimension and density, with breaks at 5 and 10 pcf⁴. The table on the following page shows the average densities and minimum average density guidelines for each density group, the guideline classes, and class adjustments as greatest dimension increases.

³ Item (Rule) 568, “Heavy or Bulky Freight—Loading or Unloading,” employs the threshold limit of exceeding 8 feet (96 inches) in greatest dimension as the measurement at which freight becomes more difficult to load and unload when compared to general boxed freight.

⁴ 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 When Greatest Dimension Does Not Exceed 96"	Class Adjustment When Greatest Dimension Exceeds 96" But Does Not Exceed 192"	Class Adjustment When Greatest Dimension Exceeds 192" But Does Not Exceed 288"	Class Adjustment When Greatest Dimension Exceeds 288"
Less than 5	3.47	3	250	300	400	500
5 but less than 10	6.76	6	150	175	200	250
10 or greater	12.86	12	85	92.5	100	110

A new attendant Note would be established to provide additional packaging requirements. The FCDC's Packaging Manager has reviewed the proposed minimum packaging requirements and determined that they are appropriate for the LTL environment.

Additionally, Notes, items 36212 and 36411 would be canceled with no further application, and item 112480 would be canceled as obsolete.