

SUBJECT 11

Re: Polish, Polishing Compounds or Polishing Wax

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Proponent: Freight Classification Development Council

Present Classification Provisions

Item	Description	Class
33430	Buffing or Polishing Compounds , including Boat, Floor, Furniture or Vehicle Polish or Wax , impregnated into paper or cloth for buffing or polishing purposes, see Note, item 33431, in boxes.....	70
33431	NOTE—Applies only when the weight of the polish or wax exceeds 65 percent of the combined weight of the wipes and the polish or wax.	
33440	☛ Buffing or Polishing Compounds , NOI, including Boat, Floor, Furniture or Vehicle Polish or Wax , see Note, item 33442, in boxes, drums, pails or Packages 602, 2323, 2341 or 2399	55
33442	NOTE—One cleaning or polishing cloth or one mop head, but not both articles, may be included in the same shipping container for each inner container. CLOTH, FABRIC, DRY GOODS OR TEXTILES GROUP: subject to item 48920	
49280	Cloths , polishing, cotton, wax or chemically treated, in boxes.....	100
58400	☛ Dressing , belt, in boxes, drums or pails.....	70
58420	☛ Dressing or Blacking , NOI, automobile top, currier's, harness, shoe, including Shoe Whitener (Cleaner) , stove (Stove Polish) or leather, other than belt, see Note, item 58422, in boxes or drums	55
58422	NOTE—Shipping containers may include one applicator or polishing cloth for each retail unit of sale.	
160450	Polishers , leather or vinyl, consisting of expanded plastic applicator pads or sponges impregnated with polishing, dressing or cleaning compounds, with or without plastic cases or covers, in boxes	150
	WAX: subject to item 196560	
196640	Carnauba , in bags, boxes or drums.....	100
196840	Shoe or Harness Makers' , in boxes or drums	70
196880	Wax , NOI, in bags, boxes or drums	100

Proposed Classification Provisions

Item	Description	Class
33430	Buffing or Polishing Compounds , including Boat, Floor, Furniture or Vehicle Polish or Wax , impregnated into paper or cloth for buffing or polishing purposes, etc	⇒Cancel; see item A-NEW
33431	NOTE—⇒Cancel; no further application.	

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Proposed Classification Provisions — Continued

Item	Description	Class
33440	☛ Buffing or Polishing Compounds , NOI, including Boat, Floor, Furniture or Vehicle Polish or Wax , etc.....	⇒Cancel; see item A-NEW and provisions otherwise applicable
33442	NOTE—⇒Cancel; no further application.	
49280	CLOTH, FABRIC, DRY GOODS OR TEXTILES GROUP: subject to item 48920 Cloths , polishing, cotton, wax or chemically treated, etc.....	⇒Cancel; see item A-NEW
58400	☛ Dressing , belt, etc	⇒Cancel; see item A-NEW and provisions otherwise applicable
58420	☛ Dressing or Blacking , NOI, automobile top, currier's, harness, shoe, including Shoe Whitener (Cleaner) , stove (Stove Polish) or leather, other than belt, etc	⇒Cancel; see item A-NEW and provisions otherwise applicable
58422	NOTE—⇒Cancel; no further application.	
⇒A-NEW	Polish, Polishing Compounds, Polishing Wax and Related Articles , not required by the U.S. Department of Transportation to bear a Hazard Class or Hazard Division label or placard, see Notes, items B-NEW and C-NEW, viz.: Automobile, Boat or Vehicle Polish or Wax; Buffing Compounds , NOI; Cloths, Pads, Sponges or Wipes , treated or impregnated with polish or wax; Floor or Furniture Polish or Wax; Leather Polish, Dressing or Conditioners; Polish, Polishing Compounds or Polishing Wax , NOI; Shoe Polish, Dressing, Cleaners or Wax; In boxes, drums or pails, subject to Item 170 and having a density in pounds per cubic foot of:	
Sub 1	Less than 12	110
Sub 2	12 but less than 22.5.....	70
Sub 3	22.5 or greater.....	65
⇒B-NEW	NOTE—Also applies on products that clean as well as polish.	
⇒C-NEW	NOTE—Does not apply on materials regulated by the U.S. Department of Transportation as hazardous and required to bear a Hazard Class or Hazard Division label or placard. For classes applicable to such hazardous materials, see provisions elsewhere in this Classification.	

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Proposed Classification Provisions — Concluded

Item	Description	Class
160450	Polishers , leather or vinyl, consisting of expanded plastic applicator pads or sponges impregnated with polishing, dressing or cleaning compounds, etc	⇒Cancel; see item A-NEW
	WAX: subject to item 196560	
196640	Carnauba , etc	⇒Cancel; see items A-NEW and 196880
196840	Shoe or Harness Makers' , etc	⇒Cancel; see item A-NEW
196880	Wax , NOI, in bags, boxes or drums	100

Analysis

Introduction

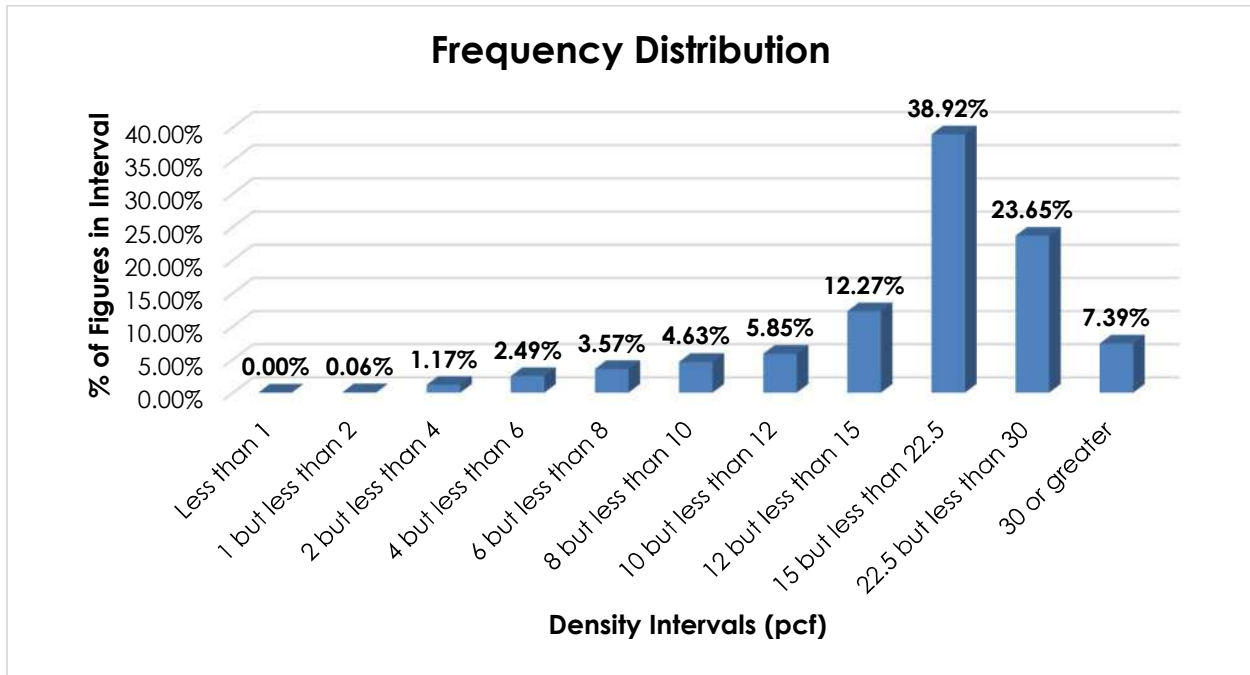
This proposal is based on the information developed through Research Project 1429, which was initiated to review the transportation characteristics of polish, polishing compounds or polishing wax.

Transportation Characteristics

Density—The information of record includes 19,174 density observations submitted by carriers and obtained from the FCDC's Density Study¹. The densities range from 1.14 to 48.90 pcf, with an overall average density of 19.37 pcf. As shown in the graph on the following page, the density distribution is left-skewed, with the highest peak in the 15 but less than 22.5 pcf interval and secondary clustered peaks around the average. Density breaks at 12 and 22.5 pcf address the spread and modality of the distribution.

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, the density ranges and averages shown in the table below emerge.

Density Group (pcf)	Density Range (pcf)	Average Density (pcf)
Less than 12	1.14 – 11.99	8.32
12 but less than 22.5	12.00 – 22.49	18.06
22.5 or greater	22.50 – 48.90	27.84

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

Conclusion

Based on the foregoing analysis, this proposal would cancel items 33430, 33440², 49280, 58400², 58420², 160450, 196640³ and 196840 with reference to a new item, naming “Polish, Polishing Compounds, Polishing Wax and Related Articles.” The new item would be restricted to products not regulated as hazardous by the U.S. Department of Transportation and would provide a “viz.” format to name various articles embraced by the item. Classes based on density breaks at 12 and 22.5 pcf⁴ would be assigned. The table on the following page relates the information of record to the proposed density groupings and FCDC guidelines.

² Items 33440, 58400 and 58420 would be canceled with reference to the new item and to provisions otherwise applicable, dependent upon whether or not the particular product shipped is regulated as hazardous by the U.S. Department of Transportation.

³ Item 196640 would be canceled with reference to both the new item and item 196880, naming “Wax, NOI.” When shipped, the appropriate classification for carnauba wax would be dependent upon the product’s representation and intended use.

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
Less than 12	8.32	8	110
12 but less than 22.5	18.06	15	70
22.5 or greater	27.84	22.5	65

Additionally, two new attendant Notes would be established to clarify the application of the new item.

Moreover, the FCDC's Packaging Manager has reviewed the proposed minimum packaging requirements and determined that they are appropriate for the LTL environment.

Notes, items 33431, 33442 and 58422 would be canceled with no further application.