

SUBJECT 21

Re: Sprinkler Heads

Contact: Angela L. Li Telephone — (703) 838-1882 angela.li@nmfta.org

Proponent: Freight Classification Development Council

Present Classification Provisions

Item	Description	Class
178080	Sprinkler Heads , automatic fire extinguisher, in boxes or drums	85
178090	Sprinklers , garden, lawn or irrigation, other than metal pulsating sprinkler heads, in boxes, 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
178095	Sprinkler Heads , pulsating, metal, in boxes, crates or drums	60

Proposed Classification Provisions

Item	Description	Class
178080	Sprinkler Heads , automatic fire extinguisher, etc.....	⇒Cancel; see item 178090
178090	Sprinklers ⇒ or Sprinkler Heads , in boxes, 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

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Proposed Classification Provisions — Concluded

Item	Description	Class
178095	Sprinkler Heads , pulsating, metal, etc.....	⇒Cancel; see item 178090

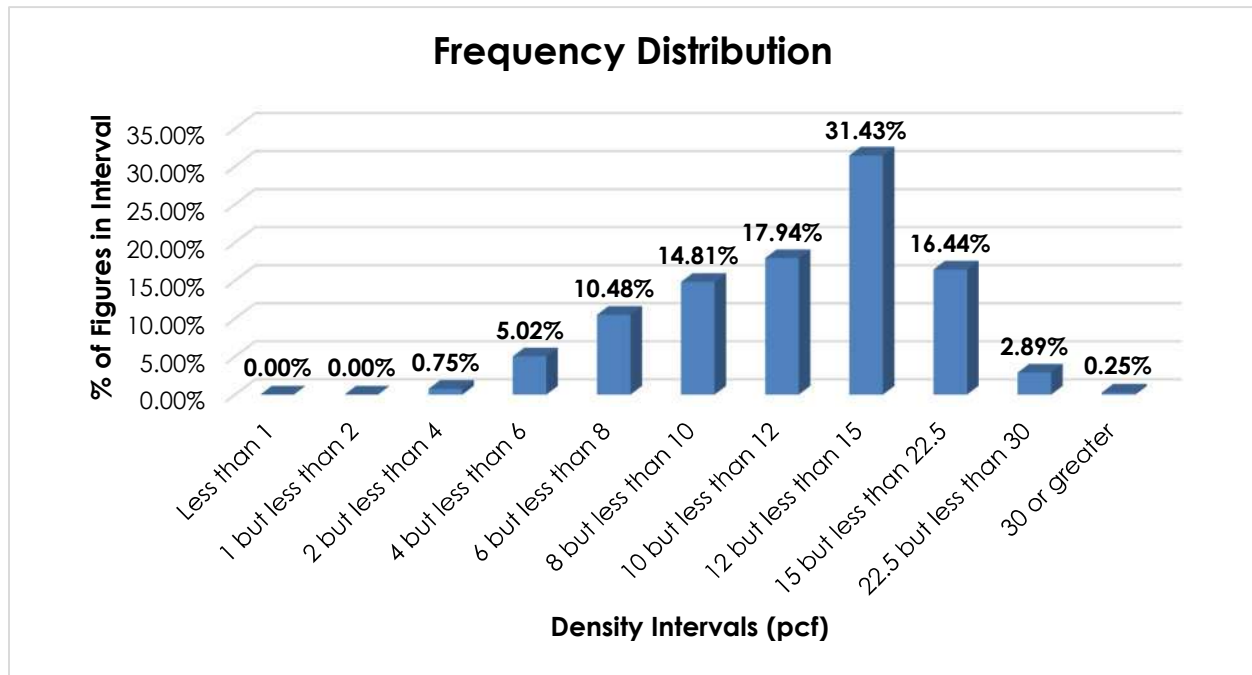
Analysis

Introduction

This proposal is in response to indications that shipments of sprinkler heads, as embraced by items 178080 and 178095, exhibit transportation characteristics inconsistent with the currently assigned classes.

Transportation Characteristics

Density—The information of record includes 1,594 density observations obtained from the FCDC’s Density Study¹. The densities range from 2.22 to 31.58 pcf, with an overall average density of 12.18 pcf. As shown in the graph below, the density figures are widely distributed along most of the range, with a slight left-skew.



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

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.

SUBJECT 21**Conclusion**

Based on the foregoing analysis, items 178080 and 178095 would be canceled with reference to the full-scale, density-based provisions of item 178090². To foster clarification and simplification, the description of item 178090 would be amended to read, "Sprinklers or Sprinkler Heads."

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

² Item 178090 provides the FCDC's standard 11-subprovision density scale, which includes reference to Item (Rule) 170, the inadvertence clause.