

SUBJECT 24

Re: Gums, natural

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Proponent: Freight Classification Development Council

Present Classification Provisions

Item	Description	Class
91100	GUMS:	
91180	Arabic , in bags, boxes or drums.....	85
91260	Chewing Gum Base , see Note, item 91262, or Chicle , in bags, boxes or drums	85
91262	NOTE—Applies on natural gums, NOI, prepared as chewing gum base or gums compounded as a chewing gum base, but will not apply on finished chewing gum.	
91300	Copal , NOI, in bags, bales, boxes or drums	70
91320	Damar (Demar) , in bags, bales, boxes or drums	70
91360	⊕Ester , in boxes, drums or four-ply paper bags, or in solid mass in Package 2501	65
91380	Gums , natural, NOI, in bags, bales, boxes or drums.....	100
91420	Karaya , in bags, bales, boxes or drums.....	85
91460	Manila , in bags, boxes or drums.....	70
91500	Pontianac , in bags, bales, boxes or drums.....	77.5
91540	Shellac , in bags, bales, boxes or drums.....	85
91560	Spruce , in bags, boxes or drums	85
91600	Turpentine , in boxes or drums	70

Proposed Classification Provisions

Item	Description	Class
91100	GUMS:	⇒Cancel; no further application
91180	Arabic , etc.....	⇒Cancel; see item A-NEW
91260	Chewing Gum Base , see Note, item 91262, or Chicle , etc.....	⇒Cancel; see item A-NEW
91262	NOTE—⇒Cancel; no further application.	
91300	Copal , NOI, etc	⇒Cancel; see item A-NEW
91320	Damar (Demar) , etc.....	⇒Cancel; see item A-NEW
91360	⊕Ester , etc	⇒Cancel; see item A-NEW and provisions otherwise applicable

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Proposed Classification Provisions — Concluded

Item	Description	Class
	GUMS: subject to item 91100	
91380	Gums , natural, NOI, etc	⇒Cancel; see item A-NEW
91420	Karaya , etc	⇒Cancel; believed to be obsolete
91460	Manila , etc.....	Cancel; believed to be obsolete
91500	Pontianac , etc	⇒Cancel; see item A-NEW
91540	Shellac , etc	⇒Cancel; see item A-NEW
91560	Spruce , etc	⇒Cancel; see item A-NEW
91600	Turpentine , etc.....	⇒Cancel; see item A-NEW
⇒A-NEW	Gums , natural, NOI, including Chicle , not required by the U.S. Department of Transportation to bear a Hazard Class or Hazard Division label or placard, see Note, item B-NEW, in bags, boxes, drums or intermediate bulk containers (IBCs), subject to Item 170 and having a density in pounds per cubic foot of:	
Sub 1	Less than 15.....	92.5
Sub 2	15 or greater	65
⇒B-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.	

Analysis

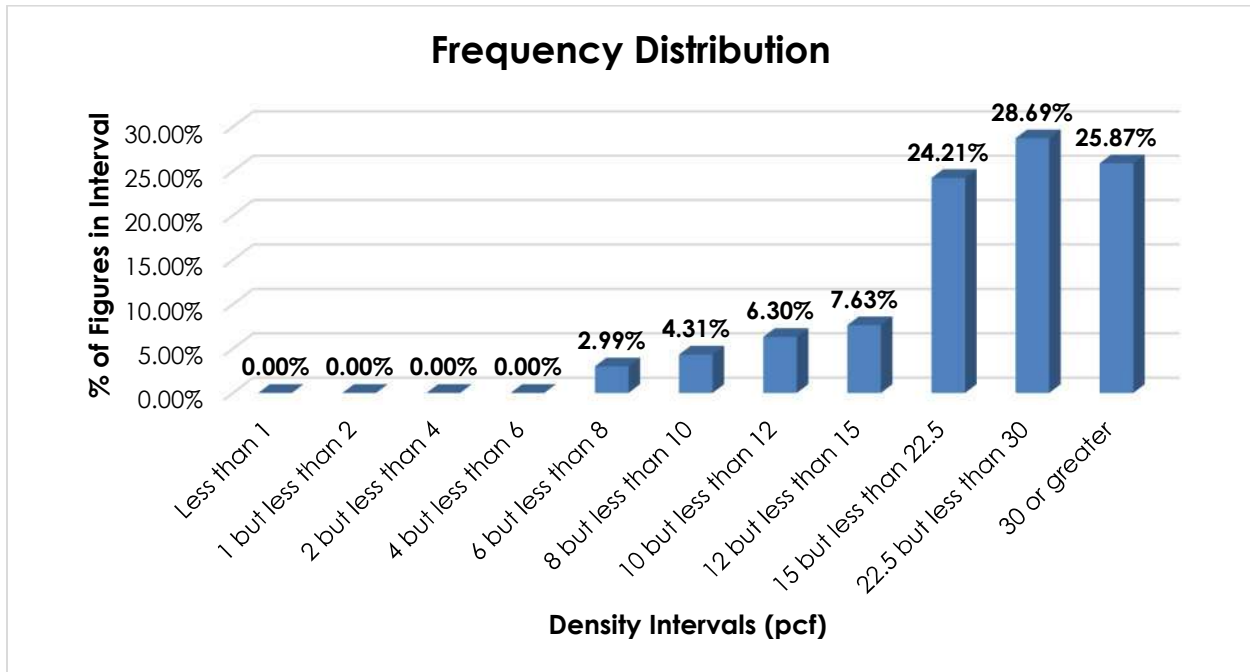
Introduction

This proposal is based on the information developed during a review of the Gums generic heading.

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Transportation Characteristics

Density—The information of record includes 603 density observations obtained from the FCDC’s Density Study¹. The densities range from 6.19 to 50.93 pcf, with an overall average density of 23.65 pcf. As shown in the graph below, the density distribution is left-skewed, with almost 79% of the figures 15 pcf or greater. A density break at 15 pcf addresses the spread and modality of the distribution.



When the data is evaluated based on the proposed density break at 15 pcf, the density ranges and averages shown in the table below emerge.

Density Group (pcf)	Density Range (pcf)	Average Density (pcf)
Less than 15	6.19 – 14.79	10.90
15 or greater	15.00 – 50.93	27.08

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.

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Conclusion

Based on the foregoing analysis, this proposal would cancel items 91180, 91260, 91300, 91320, 91360², 91380, 91500, 91540, 91560 and 91600 with reference to a new item, naming “Gums, natural, NOI, including Chicle.” The item would be restricted to natural gums not regulated as hazardous by the U.S. Department of Transportation, and would assign classes predicated on density, with a break at 15 pcf³. The table below relates the information of record to the proposed density groupings and FCDC guidelines.

Density Group (pcf)	Average Density (pcf)	FCDC Minimum Average Density Guideline (pcf)	Class Based on FCDC Density Guidelines
Less than 15	10.90	10.5	92.5
15 or greater	27.08	22.5	65

Items 91420 and 91460 would be canceled as obsolete. Note, item 91262 would be canceled with no further application, as would the generic heading, item 91100.

² Item 91360 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 The density provisions would include reference to Item (Rule) 170, the inadvertence clause.