SUBJECT 25

Re: Pumice Stone Bricks or Blocks, or Pumice Stone, including Lava Rocks — Items 162910 and 162920

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Proponent: Freight Classification Development Council

Present Classification Provisions

Item	Description	Class
162910	**Pumice Stone Bricks or Blocks,** scouring or polishing, in boxes	77.5
162920	**Pumice Stone,** including **Lava Rocks:**	
Sub 1	Crude or ground, in bags, boxes or drums	55
Sub 2	Forms or shapes, in boxes or drums	85

Proposed Classification Provisions

Item	Description	Class
162910	**Pumice Stone Bricks or Blocks,** scouring or polishing, etc	⇉Cancel; see item 162920
⇉162920	**Pumice,** including **Pumice Stone or Lava Rocks,** see Note, item NEW, in bags or boxes, subject to Item 170 and having a density in pounds per cubic foot of:	
Sub 1	Less than 15	100
Sub 2	15 but less than 30	65
Sub 3	30 or greater	55
⇉NEW	NOTE—Also applies on **Pumice Stone Blocks or Forms.**	

Analysis

Introduction

This proposal is based on information developed through Research Project 1499, which was initiated to review the transportation characteristics of pumice stone, as embraced by item 162920. The project was later expanded to include item 162910. Pictures of some of the involved commodities are shown on the following page.

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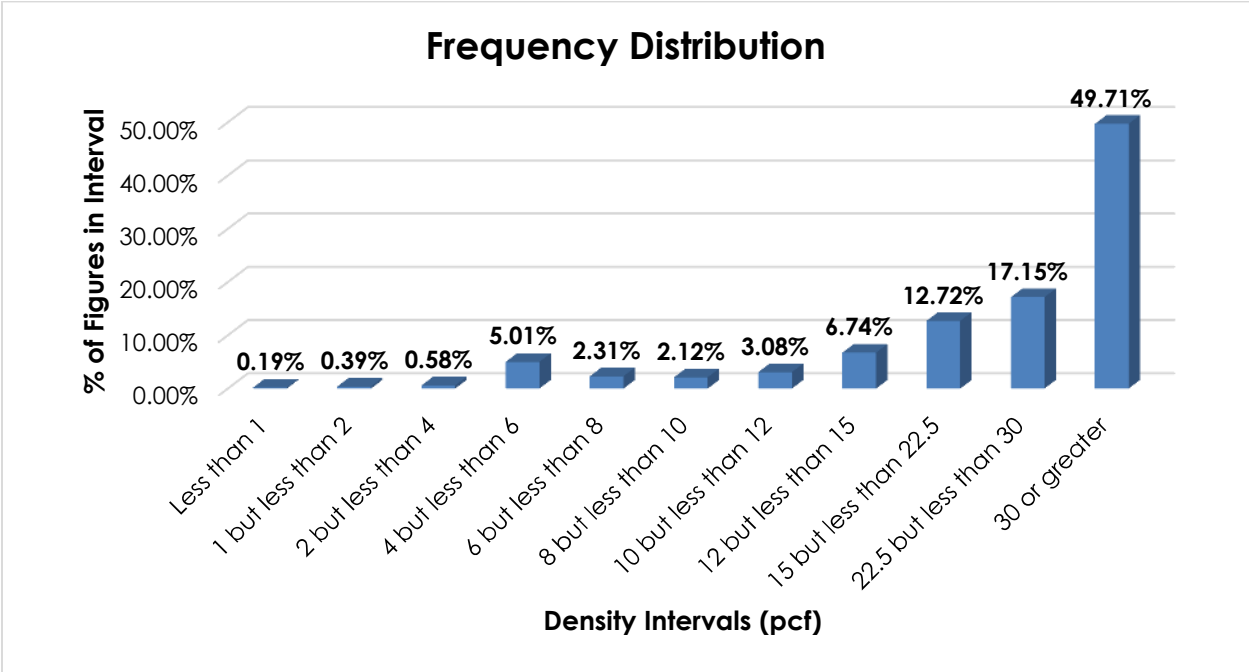
Transportation Characteristics

Density—The information of record includes 519 density observations submitted by a carrier and obtained from the FCDC's Density Study[1]. The densities range from 0.81 to 81.32 pcf, with an overall average density of 28.46 pcf. As shown in the graph below, the density distribution is skewed left, with a long tail, and a small increase in figures in the 4 but less than 6 pcf interval. Density breaks at 15 and 30 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 on the basis of the three proposed density groups to reflect the distribution of densities, the following ranges and averages are calculated.

Density Group (pcf)	Density Range (pcf)	Average Density (pcf)
Less than 15	0.81 – 14.84	9.21
15 but less than 30	15.00 – 29.80	22.95
30 or greater	30.07 – 81.32	39.69

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 item 162910 with reference to item 162920. The description of item 162920 would be amended, and classes predicated on density breaks at 15 and 30 pcf[2] would be assigned, as shown in the table below, with classes reflective of the respective average density of each grouping.

Density Group (pcf)	Average Density (pcf)	FCDC Minimum Average Density Guideline (pcf)	Class Based on FCDC Density Guidelines
Less than 15	9.21	9	100
15 but less than 30	22.95	22.5	65
30 or greater	39.69	35	55

Additionally, a new attendant Note would be established to further clarify the application of item 162920.

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

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

