

SUBJECT 4

Re: Mats, floor, rubber — Item 70960

Contact: Larissa A. Franklin Telephone — (703) 838-1824 franklin@nmfta.org

Proponent: Freight Classification Development Council

Present Classification Provisions

Item	Description	Class
	FLOOR OR WALL COVERINGS AND RELATED ARTICLES GROUP: subject to item 70500	
70960	Mats , floor, in packages:	
Sub 1	Made from rubber tires and wire combined.....	65
Sub 2	Made from recycled rubber, with or without binder, having a density in pounds per cubic foot of 35 or greater, see Note, item 70961	55
70961	NOTE—Density must be shown by shipper on shipping orders and bills of lading at time of shipment. If density is not shown and shipment is inadvertently accepted, class will initially be assessed under the provisions of item 70970, naming 'Mats or Matting, floor, NOI.' Upon satisfactory proof of actual density, class will be adjusted accordingly.	

Proposed Classification Provisions

Item	Description	Class
	FLOOR OR WALL COVERINGS AND RELATED ARTICLES GROUP: subject to item 70500	
⇒70960	Mats, Matting or Tiles , floor, rubber:	
Sub 1	In boxes or crates, subject to Item 170 and having a density in pounds per cubic foot of:	
Sub 2	Less than 22.5	70
Sub 3	22.5 but less than 30.....	65
Sub 4	30 or greater.....	55
Sub 5	In packages other than boxes or crates, see Note, item NEW, subject to Item 170 and having a density in pounds per cubic foot of:	
Sub 6	Less than 22.5	77.5
Sub 7	22.5 but less than 30.....	70
Sub 8	30 or greater.....	60
70961	NOTE—⇒Cancel; no further application.	
⇒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 protected by packing forms or other packaging materials so as to withstand the normal rigors of the less-than-truckload environment.	

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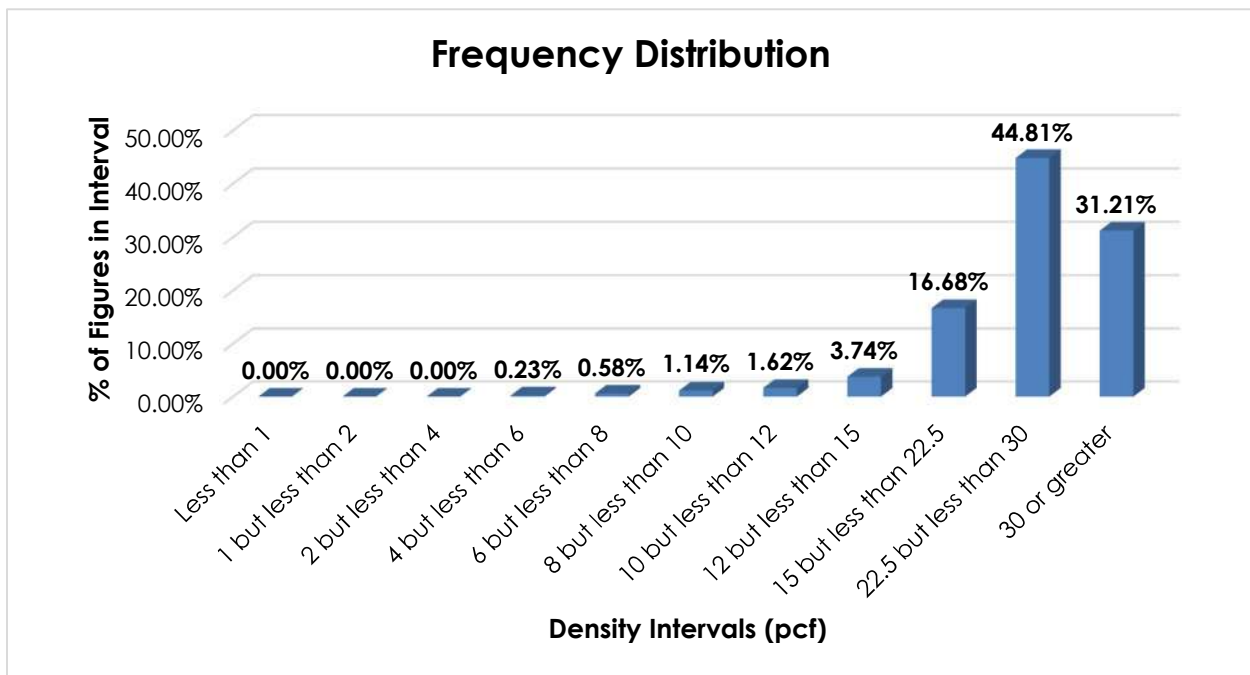
Analysis

Introduction

This proposal addresses indications that shipments of rubber floor mats, as named in item 70960, exhibit transportation characteristics inconsistent with the currently assigned classes.

Transportation Characteristics

Density—The information of record includes 31,914 density observations obtained from the FCDC’s Density Study¹. The densities range from 4.50 to 62.58 pcf, with an overall average density of 28.44 pcf. As shown in the graph below, the density distribution is left-skewed, with nearly 93% of the figures being 15 pcf or greater. Density breaks at 22.5 and 30 pcf reflect the modality and spread of the distribution.



When the data is evaluated based on the proposed density breaks at 22.5 and 30 pcf, the density ranges and averages shown in the table below emerge.

Density Groups (pcf)	Density Range (pcf)	Average Density (pcf)
Less than 22.5	4.50 – 22.49	16.79
22.5 but less than 30	22.50 – 29.99	27.46
30 or greater	30.00 – 62.58	38.80

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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Handling—Rubber floor mats may be shipped in boxes or crates, or in packages other than boxes or crates. Articles shipped in boxes or crates should not typically present unusual or significant handling considerations.

When tendered in packages that provide minimal exterior protection, additional care must be taken when handling the freight to avoid damaging the products.

Stowability—When rubber floor mats are tendered in boxes or crates, a flat load-bearing surface will typically be present, which can allow for loading other freight on top of the handling unit. There will typically be lateral support for adjacent freight as well.

When rubber floor mats are tendered in packages other than boxes or crates, a regular load-bearing surface for top freight or lateral support for adjacent freight may not be present. This can result in increased time and effort for the carrier to properly structure the vehicle load to mitigate the chance of damage to the products.

Liability—As with most general commodities, when tendered for shipment fully enclosed within boxes or crates, rubber floor mats should not be unusually susceptible to damage nor likely to damage other freight. However, when tendered in packages other than boxes or crates, rubber floor mats exhibit greater susceptibility to damage.

Conclusion

Based on the foregoing analysis, this proposal would amend item 70960 to provide classes predicated on packaging and density, with breaks at 22.5 and 30 pcf². The table below relates the information of record to the proposed density groupings and FCDC guidelines for the proposed classes when tendered in boxes or crates and a one-class adjustment from the density guidelines when the articles are tendered in packages other than boxes or crates to reflect the identified negative handling, stowability and liability characteristics.

Density Group (pcf)	Average Density (pcf)	FCDC Minimum Average Density Guideline (pcf)	Class Based on FCDC Density Guidelines	Class Adjustment Based on Handling, Stowability and Liability Considerations
Less than 22.5	16.79	15	70	77.5
22.5 but less than 30	27.46	22.5	65	70
15 or greater	38.80	35	55	60

The description of item 70960 would be amended to read, “Mats, Matting or Tiles, floor, rubber,” in the interest of clarification.

Additionally, a new Note would be established to provide additional packaging requirements for rubber floor mats tendered in packages other than boxes or crates.

Note, item 70961 would be canceled with no further application.

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