

SUBJECT 8

Re: Washers; Gaskets; or Packing Devices, Forms or Shapes, other than packaging

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Proponent: Freight Classification Development Council

Present Classification Provisions

Item	Description	Class
194000	WASHERS; GASKETS; OR PACKING DEVICES, FORMS OR SHAPES, OTHER THAN PACKAGING:	
194020	Felt , in bags, bales, boxes, drums or Packages 1241 or 1273	100
194050	Gaskets or Rings , plumbing fixture sealing or setting, wax or wax compound, with or without plastic flanges, with or without brass fittings necessary for installation, in boxes	70
194060	Lead , in boxes or drums	70
194080	Mica , in boxes or drums	100
194090	Seals or Washers , packing, uncured rubber or asphalt compound, in boxes.....	60
194100	Silver-plated , in boxes or drums	100
194120	Washers; Gaskets; or Packing Devices, Forms or Shapes , other than packaging; NOI, in bags, boxes or crates, or in wrapped rolls secured on lift truck skids or pallets, 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
194160	Washers or Gaskets , iron or steel, plain, galvanized, japanned, painted or tinned, or coated with brass, bronze, cadmium, copper, lead or zinc, in bags, boxes or drums.....	50

Proposed Classification Provisions

194000	WASHERS; GASKETS; OR PACKING DEVICES, FORMS OR SHAPES, OTHER THAN PACKAGING:	⇒Cancel; no further application
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SUBJECT 8

Proposed Classification Provisions — Concluded

Item	Description	Class
	WASHERS; GASKETS; OR PACKING DEVICES, FORMS OR SHAPES, OTHER THAN PACKAGING: subject to item 194000	
194020	Felt , etc.....	⇒Cancel; see item 194120
194050	Gaskets or Rings , plumbing fixture sealing or setting, wax or wax compound, with or without plastic flanges, with or without brass fittings necessary for installation, etc.....	⇒Cancel; see item 194120
194060	Lead , etc.....	⇒Cancel; see item 194120
194080	Mica , etc.....	⇒Cancel; see item 194120
194090	Seals or Washers , packing, uncured rubber or asphalt compound, etc.....	⇒Cancel; see item 194120
194100	Silver-plated , etc.....	⇒Cancel; see item 194120
⇒194120	Washers; Gaskets; or Packing Devices, Forms or Shapes , other than packaging; NOI, in boxes or crates, 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
194160	Washers or Gaskets , iron or steel, plain, galvanized, japanned, painted or tinned, or coated with brass, bronze, cadmium, copper, lead or zinc, etc.....	⇒Cancel; see item 194120

SUBJECT 8

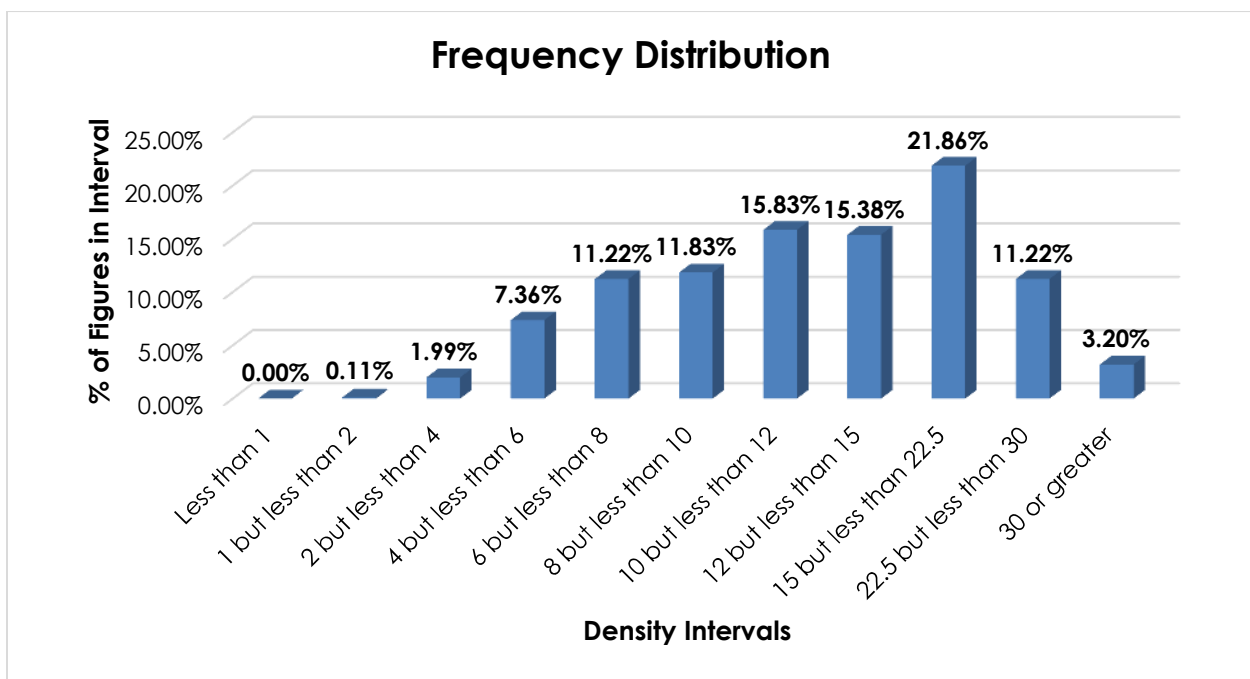
Analysis

Introduction

All of the items in the Washers; Gaskets; or Packing Devices, Forms or Shapes, other than packaging generic heading name particular types of these products, and these provisions can be difficult to interpret, apply or verify. The transportation characteristics below relate to items 194020, 194050, 194060, 194080, 194090, 194100, and 194160, as shown in the Present Classification Provisions herein.

Transportation Characteristics

Density—The information of record includes 3,778 density observations obtained from the FCDC's Density Study¹. The densities range from 0.99 to 150.00 pcf, with an overall average density of 23.68 pcf. As shown in the graph below, the density distribution is left-skewed, but the figures are variably distributed throughout the range.



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

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 8**Conclusion**

Based on the foregoing analysis, this proposal would cancel items 194020, 194050, 194060, 194080, 194090, 194100 and 194160 with reference to the full-scale, density-based provisions of item 194120². The generic heading, item 194000, would be canceled with no further application, and the indentation of item 194120 would be adjusted accordingly.

The minimum packaging requirements would ensure that freight is adequately protected and can be handled and stowed in a manner that is reasonably safe and practicable so as to withstand the normal rigors of the less-than-truckload environment.

² Item 194120 provides the FCDC's standard 11-subprovision density scale, which includes reference to Item (Rule) 170, the inadvertence clause.