

**SUBJECT 12**

**Re:** Chairs, electric or mechanical, with or without hydraulic or power-operated bases — Items 56536, 79265 and 80520

**Contact:** Adam C. Mercer Telephone — (703) 838-1911 mercer@nmfta.org

**Proponent:** Freight Classification Development Council

**Present Classification Provisions**

Item	Description	Class
56536	<b>DENTAL, HOSPITAL, MEDICAL OR SURGICAL SUPPLY GROUP:</b> subject to item 56400 <b>Chairs</b> , upholstered, equipped with mechanical lifting and lowering device for assistance in standing or sitting, in boxes or crates ..... 150	150
79265	<b>FURNITURE GROUP:</b> subject to item 79000 <b>Chairs or Spas</b> , pedicure or foot, consisting of a seating unit and base with foot bath or tub, with or without heat, therapeutic jets or other accessories in same or separate packages, in boxes or crates..... 200	200
80520	<b>Chairs</b> , adjustable, with hydraulic or power-operated bases, <b>viz.:</b> <b>Barber;</b> <b>Beauty;</b> <b>Dental;</b> <b>Medical Examination;</b> <b>Ophthalmic Examination</b> , see Note, item 80522; In Packages 1F, 3F or 5F, see Note, item 80521:	
Sub 1	SU.....	200
Sub 2	KD.....	100
80521	NOTE—Liquids must be removed from hydraulic bases or be in liquid-tight sealed bases.	
80522	NOTE—Ophthalmic examination chairs may be shipped with instrument stands or tables including base plate, pedestal, instrument arms, lamp or instrument console. Provisions do not apply on chairs or units equipped with instruments.	

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Proposed Classification Provisions

Item	Description	Class
56536	<b>DENTAL, HOSPITAL, MEDICAL OR SURGICAL SUPPLY GROUP:</b> subject to item 56400 <b>Chairs</b> , upholstered, equipped with mechanical lifting and lowering device for assistance in standing or sitting, etc ..... ⇒Cancel; see item A-NEW	
79265	<b>FURNITURE GROUP:</b> subject to item 79000 <b>Chairs or Spas</b> , pedicure or foot, consisting of a seating unit and base with foot bath or tub, with or without heat, therapeutic jets or other accessories in same or separate packages, etc ..... ⇒Cancel; see item A-NEW	
⇒A-NEW	<b>Chairs</b> , electric or mechanical, with or without hydraulic or power-operated bases, see Note, item B-NEW, <b>viz.:</b> <b>Barber, Beauty or Salon;</b> <b>Dental;</b> <b>Medical Examination;</b> <b>Mobility Assist or Lift Chairs</b> , with electrical or mechanical lifting and lowering mechanism for assistance in standing or sitting, see Note, item C-NEW; <b>Ophthalmic Examination</b> , see Note, item D-NEW; <b>Spa</b> , pedicure or foot, see Note, item E-NEW; In boxes or crates:	
Sub 1	Less than 4 .....	250
Sub 2	4 but less than 7 .....	175
Sub 3	7 or greater .....	100
⇒B-NEW	NOTE—Liquids must be removed from hydraulic bases or be in liquid-tight sealed bases.	
⇒C-NEW	NOTE—Does not apply on motor-propelled wheelchairs. For applicable provisions, see item 57070.	
⇒D-NEW	NOTE—Also applies on ophthalmic examination chairs shipped with instrument stands or tables including base plate, pedestal, instrument arms, lamp or instrument console, but does not apply on chairs or units equipped with instruments.	
⇒E-NEW	NOTE—Provisions also apply on articles consisting of a seating unit and base with foot bath or tub, with or without heat, therapeutic jets or other accessories in same or separate packages.	
80520	<b>Chairs</b> , adjustable, with hydraulic or power-operated bases, <b>viz.:</b> <b>Barber;</b> <b>Beauty;</b> <b>Dental;</b> <b>Medical Examination;</b> <b>Ophthalmic Examination</b> , etc ..... ⇒Cancel; see item A-NEW	
80521	NOTE—⇒Cancel; see item B-NEW.	
80522	NOTE—⇒Cancel; see item D-NEW.	

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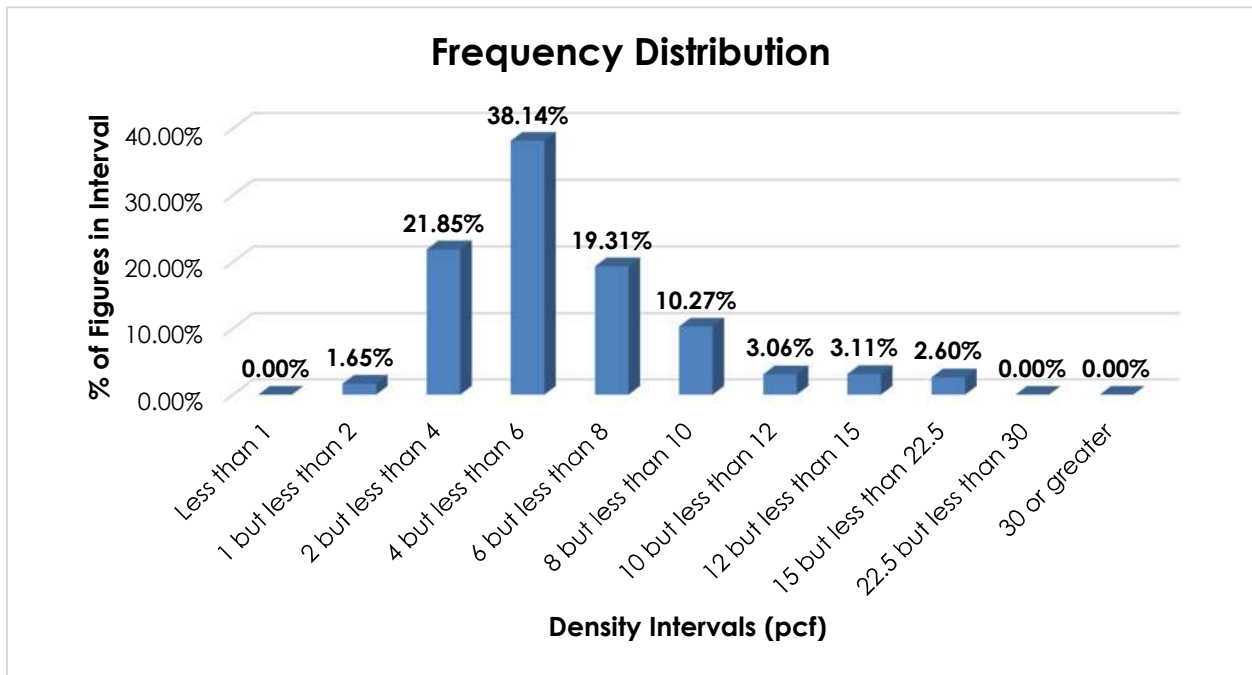
**Analysis**

**Introduction**

During the reviews of the Dental, Hospital, Medical or Surgical Supply Group and Furniture Group (Docket 2023-1, Subjects 3 and 1, respectively), it was noted that items 56536, 79265 and 80520 apply on related chairs.

**Transportation Characteristics**

**Density**—The information of record includes 11,979 density observations obtained from the FCDC’s Density Study<sup>1</sup>. The densities range from 1.11 to 16.50 pcf, with an overall average density of 6.02 pcf. As shown in the graph below, the density distribution is right-skewed, with almost 90% of the figures between 2 and 10 pcf. Density breaks at 4 and 7 pcf reflect the modality and spread of the distribution.



<sup>1</sup> 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 based on the proposed density breaks at 4 and 7 pcf, the density ranges and averages shown in the table below emerge.

Density Groups (pcf)	Density Range (pcf)	Average Density (pcf)
Less than 4	1.11 – 3.99	3.09
4 but less than 7	4.00 – 6.99	5.34
7 or greater	7.00 – 16.50	9.98

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

**Conclusion**

Based on the foregoing analysis, this proposal would cancel items 56536, 79265 and 80520 with reference to a new item, naming “Chairs, electric or mechanical, with or without hydraulic or power-operated bases” with a “viz.” format. Classes predicated on density breaks at 4 and 7 pcf<sup>2</sup> would be assigned to the new item. The table below relates the information of record to the proposed density groupings and FCDC guidelines.

Density Groups (pcf)	Average Density (pcf)	FCDC Minimum Average Density Guideline (pcf)	Class Based on FCDC Density Guidelines
Less than 4	3.09	3	250
4 but less than 7	5.34	5	175
7 or greater	9.98	9	100

Notes, items 80521 and 80522 would be canceled with reference to new Notes, and two additional Notes would be established to clarify the application of the new item.

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