

SUBJECT 15

Re: Safes or Vaults, or Parts thereof

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Proponent: Freight Classification Development Council

Present Classification Provisions

Item	Description	Class
172240	SAFES OR SAFE OR VAULT PARTS, FIRE OR BURGLAR PROOF:	
172260	Safes , with hollow walls or with solid walls less than 1 inch thick, wrapped, see Note, item 172282, or in boxes, crates or Package 2460.....	85
172280	Safes , with solid walls one inch or more in thickness, in boxes or crates or wrapped, see Note, item 172282, or in Package 2460.....	70
172282	NOTE—Safes must be wrapped with solid fiberboard or corrugated fiberboard securely fastened with steel bands. Regular slotted containers (RSC) may be closed by gluing flaps 100 percent of contact.	
172300	Safe or Vault Doors or Vault Fronts , wrapped in burlap, or in boxes or crates	70
172320	Safe Deposit Boxes or Cases , in boxes or crates	70
172340	Vault Linings , steel	65

Proposed Classification Provisions

Item	Description	Class
172240	SAFES OR SAFE OR VAULT PARTS, FIRE OR BURGLAR PROOF:	⇒Cancel; no further application
172260	Safes , with hollow walls or with solid walls less than 1 inch thick, wrapped, etc	⇒Cancel; see item NEW
172280	Safes , with solid walls one inch or more in thickness, etc.....	⇒Cancel; see item NEW
172282	NOTE—	⇒Cancel; no further application.
172300	Safe or Vault Doors or Vault Fronts , etc	⇒Cancel; see item NEW
172320	Safe Deposit Boxes or Cases , etc	⇒Cancel; see item NEW
172340	Vault Linings , steel	⇒Cancel; see item NEW
⇒NEW	Safes or Vaults, or Parts thereof , in boxes, crates or Package 2460, subject to Item 170 and having a density in pounds per cubic foot of:	
Sub 1	Less than 15.....	100
Sub 2	15 or greater	70

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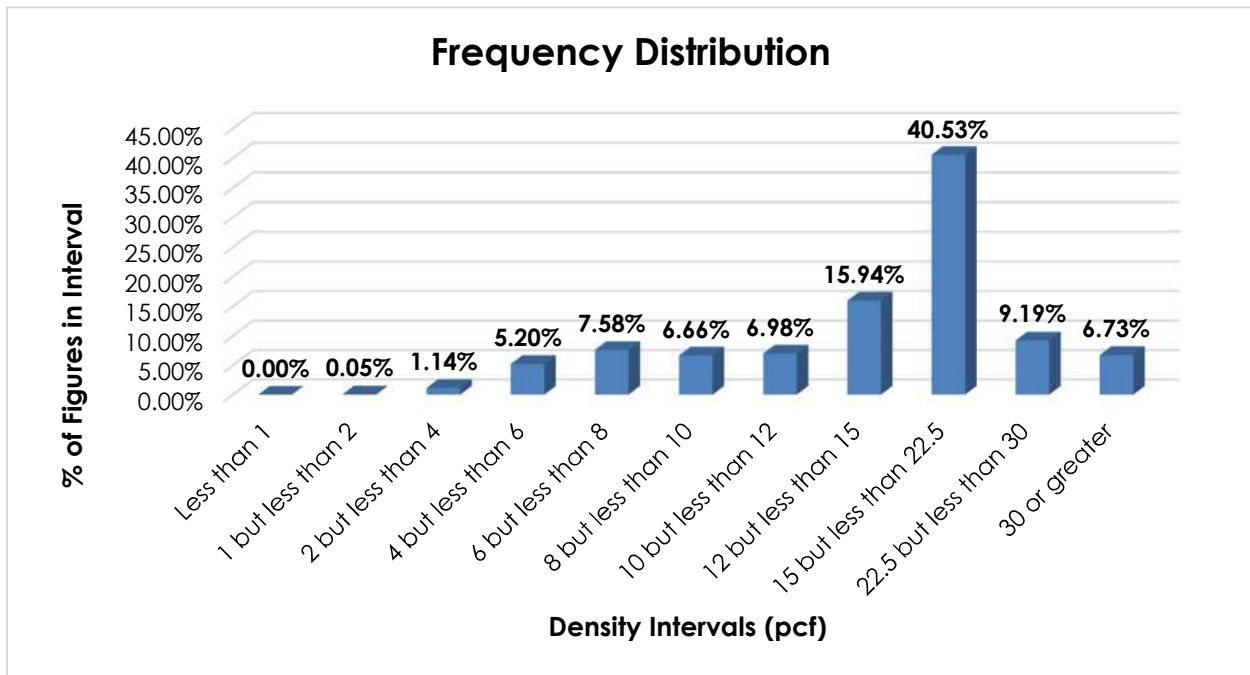
Analysis

Introduction

All of the items in the Safes or Safe or Vault Parts, Fire or Burglar Proof generic heading name particular types of safes, or safe or vault parts, and these provisions can be difficult to interpret, apply or verify. The transportation characteristics below relate to items 172260, 172280, 172300, 172320 and 172340, as shown in the Present Classification Provisions herein.

Transportation Characteristics

Density—The information of record includes 60,549 density observation obtained from the FCDC’s Density Study¹. The densities range from 1.05 to 45.45 pcf, with an overall average density of 16.42 pcf. As shown in the graph below the density distribution is left-skewed, with a predominant peak in the 15 but less than 22.5 pcf interval. A single 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 Groups (pcf)	Density Range (pcf)	Average Density (pcf)
Less than 15	1.05 – 14.99	10.09
15 or greater	15.00 – 45.45	21.26

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

Conclusion

Based on the foregoing analysis, items 172260, 172280, 172300, 172320 and 172340 would be canceled with reference to a new item, naming “Safes or Vaults, or Parts thereof.” The new item would assign classes predicated on density, with a single break at 15 pcf². 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 15	10.09	9	100
15 or greater	21.26	15	70

Additionally, the generic heading, item 172240, and Note, item 172282 would be canceled with no further application.

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