

SUBJECT 19

Re: Item (Rule) 680, Note 3 — Articles Tendered on Reels

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Proponent: Classification Resource Committee

Present Classification Provisions**ITEM 680****PACKING OR PACKAGING—GENERAL****General**

Sec. 1. (a) Not Involved.

Notes 1 and 2—Not Involved.

Note 3—Unless otherwise provided, articles tendered on reels shall be deemed to be in compliance when the reel is filled to not less than 65 percent of capacity. When filled to less than 65 percent of capacity, the gross weight of the reel and its contents will be subject to the class applicable to either the reel or its contents, whichever is higher.

Note 4—Not Involved.

Secs. 1. (b)-17. Not Involved.

Proposed Classification Provisions**ITEM 680****PACKING OR PACKAGING—GENERAL****General**

Sec. 1. (a) No Change.

Notes 1 and 2—No Change.

Note 3— \Rightarrow Unless otherwise provided, reels used as shipping containers which are not filled equal to or greater than their weight with a product will be subject to the class applicable to the empty reel. Reels filled with a product equal to or greater than the weight of the reel will be subject to the class applicable to the product wrapped or wound thereon.

It is recommended that the shipper declare the following on the bill of lading and shipping papers at the time of shipment: (1) the tare or empty weight of each reel, spool or flanged core; and (2) the actual gross weight of each shipping container with product as tendered for shipment.

Note 4—No Change.

Secs. 1. (b)-17. No Change.

SUBJECT 19**Analysis and Conclusion**

This proposal was docketed by the Classification Resource Committee (CRC) based on a recommendation from the CRC's Packaging Subcommittee.

Until 2021¹, the determination of the occupancy of reels was based on the weight of the reel as compared to the weight of the product. In an effort to be consistent with provisions in Item 680, Note 2, Note 3 was changed to be based on the occupancy of the reel (65%), as shown in the Present Classification Provisions herein. However, the current provisions require the carrier to account for the width of the reel's core, which is not always accessible, causing interpretation questions to arise.

Therefore, this proposal would amend Item 680, Note 3 by providing requirements similar to the original language based on the weight of the empty reel and the weight of the product thereon. It would also provide a recommendation that the shipper declare the weight information of the reel and product at the time of tender on the bill of lading and shipping papers.

¹ Docket 2021-2, Subject 12 (June 2021)