

**SUBJECT 4**

**Re:** Presses

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**Proponent:** Freight Classification Development Council

**Present Classification Provisions**

| Item   | Description   | Class |
|--------|---|-------|
|        | <b>MACHINERY GROUP:</b> subject to item 114000                                      |       |
| 127000 | <b>Presses:</b>   |       |
| 127020 | <b>Baling, NOI:</b>   |       |
| Sub 1  | SU, loose or on skids .....   | 125   |
| Sub 2  | SU, in boxes or crates.....   | 100   |
| Sub 3  | KD, in packages.....  | 77.5  |
| 127040 | <b>Fruit or Vegetable, NOI:</b>   |       |
| Sub 1  | Loose or on skids, see Note, item 127042.....                                       | 100   |
| Sub 2  | In boxes or crates.....   | 92.5  |
| 127042 | NOTE—'Loose or on skids' applies only on fruit presses of the wooden tub type.      |       |
| 127060 | <b>Hydraulic Wheel:</b>   |       |
| Sub 1  | SU.....   | 100   |
| Sub 2  | KD.....   | 70    |
| 127080 | <b>Metal Drawing, Extruding, Forging, Piercing, Punching, Shearing or Stamping:</b> |       |
| Sub 1  | SU, loose or on skids .....   | 100   |
| Sub 2  | SU, in boxes or crates.....   | 92.5  |
| Sub 3  | KD, in packages.....  | 85    |
| 127120 | <b>Printing, NOI:</b>   |       |
| Sub 1  | On skids.....   | 100   |
| Sub 2  | In boxes or crates.....   | 85    |
| 127140 | <b>Presses, filter, NOI:</b>  |       |
| Sub 1  | SU.....   | 92.5  |
| Sub 2  | KD.....   | 70    |
| 127160 | <b>Presses, NOI:</b>  |       |
| Sub 1  | SU, loose or on skids .....   | 100   |
| Sub 2  | SU, in boxes or crates.....   | 92.5  |
| Sub 3  | KD, in packages.....  | 85    |
| 127180 | <b>Rubber Products Curing (Vulcanizers)</b> .....                                   | 85    |
| 127190 | <b>Screen Printing (Screen Presses or Screen Printers):</b>                         |       |
| Sub 1  | In packages other than boxes or crates.....   | 200   |
| Sub 2  | In boxes or crates.....   | 125   |

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**Proposed Classification Provisions**

| Item   | Description   | Class                           |
|--------|---|---------------------------------|
|        | <b>MACHINERY GROUP:</b> subject to item 114000  |                                 |
| 127000 | <b>Presses:</b> .....   | ⇒Cancel; no further application |
| 127020 | <b>Baling</b> , NOI, etc.....   | ⇒Cancel; see item NEW           |
| 127040 | <b>Fruit or Vegetable</b> , NOI, etc.....   | ⇒Cancel; see item NEW           |
| 127042 | NOTE—   | ⇒Cancel; no further application |
| 127060 | <b>Hydraulic Wheel</b> , etc.....   | ⇒Cancel; see item NEW           |
| 127080 | <b>Metal Drawing, Extruding, Forging, Piercing, Punching, Shearing or Stamping</b> , etc.....                 | ⇒Cancel; see item NEW           |
| 127120 | <b>Printing</b> , NOI, etc.....   | ⇒Cancel; see item NEW           |
| 127140 | <b>Presses</b> , filter, NOI, etc.....  | ⇒Cancel; see item NEW           |
| 127160 | <b>Presses</b> , NOI, etc.....  | ⇒Cancel; see item NEW           |
| 127180 | <b>Rubber Products Curing (Vulcanizers)</b> .....   | ⇒Cancel; see item NEW           |
| 127190 | <b>Screen Printing (Screen Presses or Screen Printers)</b> , etc.....   | ⇒Cancel; see item NEW           |
| ⇒NEW   | <b>Presses</b> , NOI:   |                                 |
| Sub 1  | In boxes or crates, subject to Item 170 and having a density in pounds per cubic foot of:                     |                                 |
| Sub 2  | Less than 8.....  | 150                             |
| Sub 3  | 8 but less than 15.....   | 92.5                            |
| Sub 4  | 15 or greater.....  | 65                              |
| Sub 5  | In packages other than boxes or crates, subject to Item 170 and having a density in pounds per cubic foot of: |                                 |
| Sub 6  | Less than 8.....  | 175                             |
| Sub 7  | 8 but less than 15.....   | 100                             |
| Sub 8  | 15 or greater.....  | 70                              |

**Analysis**

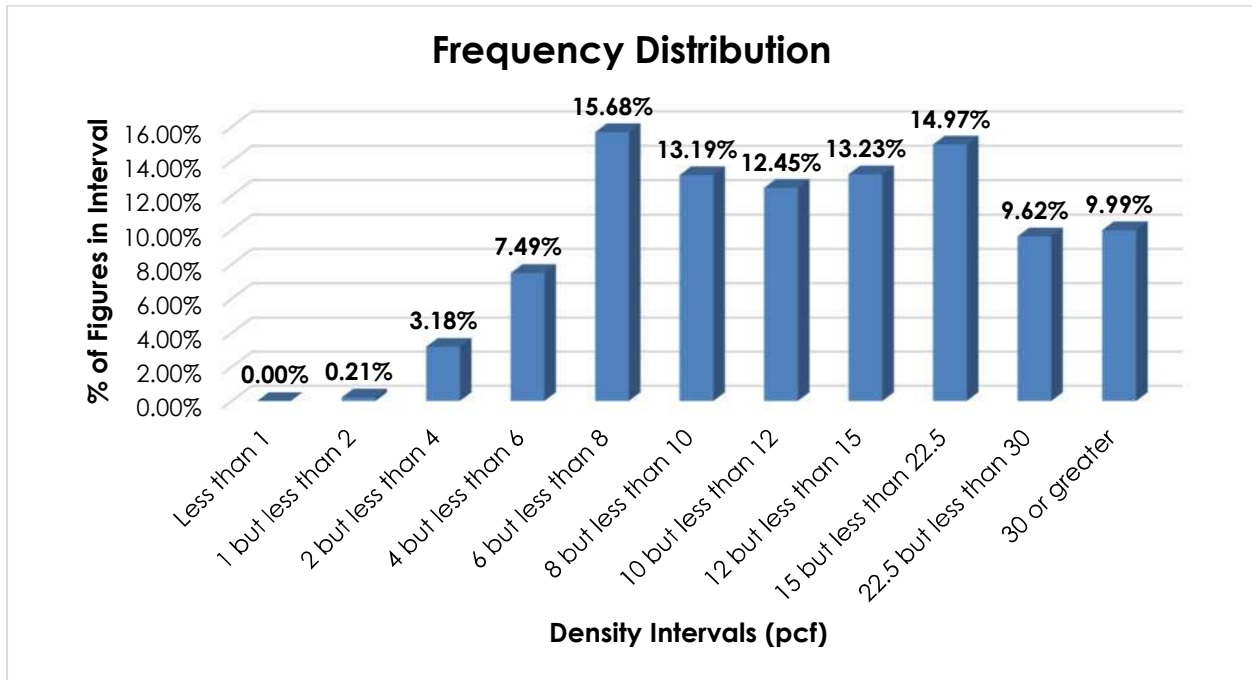
**Introduction**

This proposal is based on information developed during a review of the Presses subgeneric heading.

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Transportation Characteristics

**Density**—The information of record includes 8,773 density observations obtained from the FCDC’s Density Study<sup>1</sup>. The densities range from 1.16 to 57.52 pcf, with an overall average density of 15.03 pcf. As shown in the graph below, the density distribution has clustering around distinct peaks in the 6 but less than 8 pcf and 15 but less than 22.5 pcf intervals. Density breaks at 8 and 15 pcf reflect the modality and spread of the distribution.



When the data is evaluated based on the proposed density breaks at 8 and 15 pcf, the density ranges and averages shown in the table below emerge.

| Density Groups (pcf) | Density Range (pcf) | Average Density (pcf) |
|----------------------|---------------------|-----------------------|
| Less than 8          | 1.16 – 7.99         | 6.00                  |
| 8 but less than 15   | 8.00 – 14.99        | 11.11                 |
| 15 or greater        | 15.00 – 57.52       | 26.38                 |

**Handling**—Presses 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.

<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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**Stowability**—When presses 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 presses 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, presses should not be unusually susceptible to damage nor likely to damage other freight. However, when tendered in packages other than boxes or crates, presses exhibit greater susceptibility to damage.

**Conclusion**

Based on the foregoing analysis, and in the interest of clarification and simplification, items 127020, 127040, 127060, 127080, 127120, 127140, 127160, 127180 and 127190 would be canceled with reference to a new item, naming “Presses, NOI,” subject to the Machinery Group, with classes predicated on packaging and density, with breaks at 8 and 15 pcf<sup>2</sup>. 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 Groups (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 8          | 6.00                  | 6  | 150                                    | 175  |
| 8 but less than 15   | 11.11                 | 10.5   | 92.5                                   | 100  |
| 15 or greater        | 26.38                 | 22.5   | 65                                     | 70   |

Concurrently, Note, item 127042 will be canceled with no further application, as would the Presses subgeneric heading, item 127000.

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