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February 25, 2025

National Motor Freight Traffic Association, Inc.
Attention: Docket 2025-1
1001 North Fairfax Street, Suite 600
Alexandria, VA 22314

The Alliance for Chemical Distribution submits the following comments in response to the National Motor Freight Traffic Association, Inc.'s proposed **Docket 2025-1**, published January 30, 2025.

About ACD

The Alliance for Chemical Distribution (ACD) supports and champions the chemical distribution experts the world depends on to safely, reliably, responsibly, and sustainably move the chemical products essential to our daily lives. ACD's more than 400 chemical distribution industry members are primarily small, multi-generational family-owned businesses. They provide critical chemical products used in medicine and health care, food and agriculture, clean water and sanitation, energy production, electronics, communication, and more to over 750,000 end users.

As leaders of the over \$27 billion chemical distribution industry, ACD member companies have the extensive expertise, commitment to safety and sustainability, and access to a deep well of resources needed to ensure chemicals are moved safely and responsibly when and where they are needed. ACD owners and operators have a personal stake in the health, safety, and security of their employees, companies, and communities. They demonstrate their commitment through strict adherence to the highest standards in quality, safety, sustainability, and performance through compliance with ACD Responsible Distribution™.

Transportation is critical to the chemical distribution industry. ACD members make millions of shipments, moving tens of millions of tons of products each year. ACD members rely on less-than-truckload (LTL) shipments to move their products across the country. These chemicals are vital ingredients in products related to pharmaceuticals, renewable energy, food, semiconductor chip manufacturing, and much more.

Need to Mitigate Disruptions Caused by Proposed Changes

In docket 2025-1, several changes were made to the National Motor Freight Classification (NMFC) system, a method used to classify freight in LTL shipments. Notably, these changes remove the unique item numbers for 117 chemicals, moving them all under the generic category of “Chemical, vis.” In doing so, shippers of these chemicals are required to determine the density of their product on a newly proposed 13-point density scale to determine its freight class.

ACD understands the reasoning behind this change as it makes it much easier to classify cargo without handling, stowability, or liability concerns. ACD members are careful to ensure they classify their cargo correctly at every step of the supply chain, and efforts to make this process easier are greatly appreciated.

However, ACD members have shared concerns about how this change may complicate their efforts in determining the correct freight class for shipped cargo. Moreover, there are fears that the new freight class for many chemicals under this new system will be higher and, therefore, more costly.

Also, this change may significantly disrupt the software and other external systems used by ACD members that rely on the current NMFC structure. For example, many computer systems cannot calculate a shipment’s dimensions, therefore not able to provide a product’s density. Since this will be necessary to determine freight class, shippers will be forced to utilize other software programs that are more costly to implement the needed changes. This will also create administrative issues in training and making the necessary accommodations to implement a new software system.

Lastly, these changes may create additional confusion as items go further down the supply chain. Currently, it is common for suppliers to either not include or have incorrect NMFC information in bills of lading. Complicating the process to identify an item’s freight class correctly may exacerbate these problems.

With this proposal making such a comprehensive shift to the NMFC system, ACD urges the National Motor Freight Traffic Association (NMFTA) to offer support and flexibility to shippers as these changes are implemented. Also, ACD urges NMFTA to work with service providers to assist in this transition.

Conclusion

ACD appreciates the opportunity to provide input as the NMFTA considers changes to its NMFC system. This system is widely used when transporting LTL cargo and must be updated to improve its transparency and functionality. Shippers stand to benefit from the increased ease in item classification, though it is also crucial to recognize that there will be some struggles for shippers when determining an item’s freight class and steps must be taken to minimize these issues.

Thank you for your consideration. If you have questions or require additional information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Jennifer C. Gibson". The signature is fluid and cursive, with the first name being the most prominent.

Jennifer C. Gibson
Senior Vice President, Regulatory Affairs
Alliance for Chemical Distribution
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