NMFC Docket Subject Number: 13, 23, 39, 40, 44, 45, 46, 49, 53, 68, and 69

ArcBest

Subjects 13, 23, and 49

We are one of the few carriers that will handle "carbon black" because of the handling, stowability, and liability concerns. Carbon Black tends to be powdery and harmful. If it leaks out of the packaging it requires a very thorough and specialized cleaning. We have processes to double bag shipments with carbon black as additional protection. We use specific NMFC items to identify carbon black and prompt various operational teams to handle the freight appropriately.

We use the following NMFC items to distinguish carbon black freight:

23900, 23940, 23975, 23980, 40560, 40590, 40600, 40650, 40660, 89820. These 10 NMFC make up the full list of NMFCs that we use to apply our Carbon Black fee. 6 of these 10 show up in Subjects 13 and 23.

Subject 13 (Blacks, Dry) lumps 23820, 23880, **23900, 23940** together under a New NMFC item number. The 2 bolded NMFCs require special handling and have a special Carbon Black charge and should be kept separate from the others.

Subject 23 (Carbon) lumps 40580, **40590**, **40600**, 40630, 40640, **40650**, **40660**, 40670, 40680, 40690, 40710 together under a new NMFC Item number. The 4 bolded NMFCs require special handling and have a special Carbon Black charge and should be kept separate from the others.

Subject 49 (Graphite Articles) – could we add a clarifying note – something to the effect of "Does not apply on graphite shipped in crude, lump, ground, or powdered form. See NMFC Item 89820." Just something to remove any doubt about carbon black-like graphite product does not classify under the provisions.

Subject 39

Instead of creating a new item for Fasteners and Fastener Parts, we would suggest moving these under 095190 (Hardware NOI).

Subject 40

We don't take Hay because of the possibility of getting bugs and insects into the trailer. We have 067260 Hay on our list of prohibited articles.

Not sure if we're the only carrier that doesn't accept hay but we would suggest it has H/S/L concerns. We would prefer to leave it as its own separate NMFC Item.

Subject 44

Instead of creating a new item for Forms, Clothing Display, etc, we would suggest moving these under 057410 (Displays, NOI).

Subject 45

Instead of creating a new item for Fruits or Vegetables, we would suggest moving these under 73260 (Foodstuffs, Group IV).

Subject 46

We have fresh fruits and vegetable on our Prohibited Items list. I think there would be S/H/L concerns for most carriers.

Subject 53

We would suggest canceling 92280 (Hair Goods, NOI, human or imitation hair or hairpieces) and then adding those commodities in with the new item being created (Hair or Bristles).

Subject 68

Instead of creating a new item for Edible Nuts, we would suggest moving these under 73260 (Foodstuffs, Group IV).

Subject 69

We would suggest canceling 145100 (oils, liquid or solidified) and then adding those commodities in with the new item being created (Oils, Other than Petroleum).