Freight Classification Development Council
National Motor Freight Traffic Association, Inc.
1001 North Fairfax Street, Suite 600
Alexandria, VA 22314

Subject: Opposition to NMFC Docket 2025-1 Changes Implementing Density-Based Classifications

Dear Members of the Freight Classification Development Council,

I am writing to formally oppose the proposed changes in NMFC Docket 2025-1 that seek to implement density-based classifications for additional commodities. While density-based classification is intended to improve fairness and accuracy in freight rating, the current industry practices surrounding measurement equipment undermine this goal. The reliance on automated dimensioning machines and scales, while technically **NTEP-certified, does not mean they are being used in a way that is fair or transparent.** Until proper safeguards are in place to ensure reliable and verifiable measurement practices, these proposed changes should not move forward.

Historical Accuracy vs. Automation Errors

Before the adoption of automated measurement systems, **corrections were performed manually using a tape measure**, with a precision of **¼ inch** per dimension. This level of accuracy ensured that density calculations were based on reliable, verifiable data. In contrast, **modern dimensioning machines often have a margin of error of at least ½ inch per dimension**, meaning that today's automated system is less precise than the manual method it replaced.

Example: How Small Errors Can Create Unfair Density Changes

To illustrate the problem, consider a **standard pallet measuring 40" x 48" x 48" with a weight of 320 lbs.** Under accurate measurement, the density is:

6 PCF

Now, applying a **½-inch margin of error per dimension** and a **5 lb weight margin of error**, we see significant fluctuations:

- **High dimensions, high weight** → Density drops to **5.90 lbs per cubic foot**
- **Low dimensions, low weight** → Density increases to **6.11 lbs per cubic foot**
- **High weight, low dimensions** → Density increases to **6.30 lbs per cubic foot**
- **Low weight, high dimensions** → Density drops to **5.71 lbs per cubic foot**

Even minor measurement variations can push shipments into different NMFC classes, leading to unjustified cost increases for shippers. The impact of these errors is **compounded by certain carrier policies that only correct errors when it results in higher charges, while ignoring downward adjustments.** This asymmetry is inherently unfair and makes density-based classification unreliable under current practices. Software used by carriers to collect and process the measurement data into freight bill corrections should also be NTEP approved to guarantee transparency and fairness.

Concerns About Weighing Equipment

Carrier-operated scales, though certified, often produce inconsistent weight readings due to factors such as calibration frequency, equipment wear, and operational handling. Many carriers apply weight corrections **only when they increase charges**, while disregarding adjustments that would lower costs. **A classification system that depends on unreliable inputs cannot be considered fair or transparent.**

Fair Use of NTEP-Certified Equipment Requires Transparency

The fact that dimensioning machines and scales are **NTEP-certified does not guarantee that they are being used fairly.** Certification ensures compliance with a baseline standard, but it does not regulate **how the equipment is used operationally** or whether results are applied equitably. Without rules governing transparency and accountability, density-based classifications will disproportionately harm shippers, who have no way to verify the accuracy of the carrier's measurements.

Transparency Requirements Must Come First

Before any density-based classification changes are implemented, rules must be put in place to ensure shippers have full visibility into measurement data.** At a minimum, every correction certificate should include:

1. **Device Make and Model** – The specific dimensioning or weighing device used to generate the correction.
2. **Margin of Error** – The manufacturer's specified accuracy tolerance for the device.
3. **Last Calibration Date** – Proof that the equipment was recently tested and verified to be within acceptable limits.
4. **Measurement Records** – The original shipper-provided weight and dimensions alongside the carrier's recorded correction.
5. **See NCWM Uniform Shipment Law proposal for a complete list**

Requiring this information will ensure that all parties operate under the same standards and that discrepancies can be meaningfully challenged when errors occur.

Request for Reconsideration

Until these fundamental fairness issues are addressed, I urge the Freight Classification Development Council to reject the density-based classification changes proposed in NMFC Docket 2025-1. Shippers should not be forced to accept corrections based on unverifiable, potentially inaccurate measurement data that systematically favors carriers. **Changes of this magnitude should only be implemented after transparency rules are established—not before.**

Thank you for considering my concerns. I appreciate the opportunity to provide my opinion and urge the NMFTA to prioritize fairness and accountability in any changes to the NMFC.

Sincerely,

James Hannum