

OD Comments on Docket 2025-1

General Observations

1. NMFTA promoted great simplification to the Classification, as well as elimination of outdated and archaic provisions.
2. While there will be less item numbers to consider or choose, the viz. listings are cumbersome and today's interpretations issues will continue to exist.
3. It appears there was no effort to simplify and combine descriptions, especially where material construction is involved.
4. Current provisions were copied and pasted as is with little editing and put into excessively long viz. listings.
5. Some new/revised items now have sub-viz. listings. Instead of keeping an existing item with a viz. listing or properly incorporating the provisions into the main viz. listing, the provisions were just copied and pasted in without editing or simplifying.
6. Viz. listings are not necessary in all cases. Some commodities that may not need a viz. listing are:
 - a. Barks
 - b. Covers
 - c. Fruits or Vegetables, Dried, Group
 - d. Fruits or Vegetables, Fresh or Green, Group
 - e. Graphite Articles
 - f. Hair or Bristles
 - g. Mica
 - h. Nuts, edible
 - i. Packing Group
 - j. Paste Group
 - k. Seed Group
 - l. Wax
7. Archaic terminology such as "in the white" and "nested," plus archaic packaging provisions such as "in metal cans in crates" or "in bags, or in bulk in bags" were kept and not removed or revised.
8. The listing of minimum packaging requirements (especially when they are the same) in each viz. listing further complicates the viz. listings, such as:

ALLOYS: subject to item 12700

Alloys, viz.: subject to item A-NEW

Ferrosilicon-chrome or Ferrochrome-silicon, in bags, boxes or drums;

Ferrotitanium, in bags, boxes or drums;

Ferrotungsten, in boxes or drums;

Manganese-titanium, in boxes;

Silicomanganese, in bags, boxes or drums;

Silicon-zirconium, in bags or drums;

Zirconium-ferrosilicon, in bags, boxes or drums;

Zirconium-ferrosilicon-titanium, in bags, boxes or drums;

Subject to item 170 and having a density in pounds per cubic foot of:

Observations on Specific Proposals

1. Subject 14 — Boilers, Furnaces, Stoves and Related Articles Group

- a. The new item lists “or Parts Named” at the top, but there is a sub viz. listing for “Boiler Parts, iron or steel, viz.” In addition, there are other specific types of parts named in the viz. listing. This is redundant and unnecessary.
 - i. Change “or Parts Named” to “or Parts thereof” so the parts/components don’t need to be specifically named.

item A-NEW

⇒A-NEW **Boilers, Furnaces, Radiators, Stoves, Related Articles or Parts Named, viz.:**
 Army Field Ranges and Cooking Outfits, in packages;
 Army Tent Stoves, sheet steel, nested, in packages;
 Boiler Parts, iron or steel, viz.:
 Braces; Flanges; Nozzles; or Handhole or Manhole Collars, Covers,
 Crabs or Lugs; in packages;
 Casings, KD, insulated or not insulated, in boxes;
 Domes or Drums, in packages;
 Doors, with or without frames, in packages;
 Flues or Tubes, not enameled, in packages;
 Header Sections (Headers and Tubes or Baffles combined), in packages;
 Heads (Ends), in packages;
 Parts, cast, NOI, in packages;
 Plates, in packages;
 Sections, cast iron, in packages;
 Broilers, Cookers or Roasters, electric, NOI, see Note, item B-NEW,
 with or without broiler grids, ovenware dishes, insert pan or racks,
 in boxes or Package 1082;
 Broilers, Grills, Roasters or Smokers, cooking, portable, outdoor type,
 charcoal burning, kamado style, ceramic, with or without
 components of other materials, see Note, item C-NEW, in boxes;
 Broilers, Grills, Roasters or Stoves, cooking, portable, outdoor type,
 charcoal burning, steel, in boxes,

- b. Consolidate of descriptions for “**Broilers, Grills, Roasters or Stoves**, cooking” to address six specific listings.
- c. In OD’s opinion, item 26720 should not be included in the new item as another sub-viz. listing. Instead keep it and change the classes to full scale density.

BOILERS, FURNACES, STOVES AND RELATED ARTICLES GROUP: subject to
 item 25400
Boilers, Furnaces, Radiators, Stoves, Related Articles or Parts Named, viz.:
 subject to item A-NEW
Ovens, Ranges or Stoves, cooking, and **Related Cooking Equipment**,
 electric or gas, viz.:
 Convection Ovens, including **Air Fryers**;
 Grills or Broilers, indoor type, with integral heating elements in tops or
 in tops and bottoms;
 Hotplates;
 Microwave Ovens;
 Ovens, NOI;
 Pizza Ovens;
 Ranges, NOI;
 Stoves, NOI, indoor type;
 Stovetops, Cooktops or Grills, NOI, indoor type;
 Toaster Ovens;
 Waffle Irons;
 In boxes, crates or Packages 112, 131, 972, 1019, 1082, 1462 or 2260,
 see Note, item M-NEW;

- d. Many of the Notes that are to be maintained are no longer necessary as they are overly specific or provide requirements that we are not able to identify in a shipment and may cause interpretation issues or questions (e.g. N-NEW)
- e. The packaging exceptions in the Notes are also no longer necessary as they are hard for us to confirm (e.g. U-NEW).

2. Subject 35 — Dental, Hospital, Medical or Surgical Supply Group

- a. Instead of incorporating item 56545 as a sub-viz. listing for clothing and related articles, OD would like to see item 56545 canceled with reference to item 49880 for Clothing, NOI. These types of clothing articles are not exclusive to medical settings.

56545

Clothing and Related Articles, disposable, paper or nonwoven cloth, with or without reinforcement of other materials, see Notes, items 56546 and 56547, **viz.:**

Aprons;
Caps or Hoods;
Clothing, NOI;
Coveralls;
Drapes;
Laboratory Coats;
Leggings or Pants;
Patient Examination Gowns;
Sheets or Pillowcases;
Shirts;
Shoe Covers;
Towels or Washcloths;

In boxes, subject to Item 170 and having a density in pounds per cubic foot of:

- b. The items would be more concise and less likely to have interpretation issues if sub-viz. listings were incorporated into the viz. listing or have Notes to specify what products are included.

DENTAL, HOSPITAL, MEDICAL OR SURGICAL SUPPLY GROUP: subject to item 56400

Dental, Hospital, Medical or Surgical Apparatus, Instruments, Machines or Supplies, viz.: subject to item 56590

- ⇒ **Mobility Aids**, NOI, other than self-propelled, including **Crutches, Walkers or Wheelchairs**, in boxes;
- ⇒ **Pads or Sponges**, dental, medical or surgical, NOI, in boxes;
- ⇒ **Processors**, blood cell, centrifugal, in boxes;
- ⇒ **Pumps or Aspirators**, suction or pressure, including **Breast Pumps**, with or without appliances for drainage or other treatment of body cavities, in boxes;
- ⇒ **Respiratory Therapy Aids, viz.:**
 - Apparatus or Sets**, gas or oxygen administration, other than expendable breathing circuits or administration sets, see Note, item D-NEW, in boxes;
 - Apparatus**, pulmonary assistance, consisting of portable air compressor and nebulizer with tubing and mouthpiece, in boxes;
 - Oxygen Concentrators**, see Note, item E-NEW, in boxes;
 - Respirators**, mechanical, in boxes;
 - Vaporizers**, other than electric, with or without medicine, in boxes;
- ⇒ **Safes**, X-ray film, in boxes;
- ⇒ **Stretchers or Litters**, in boxes;
- ⇒ **Surgical Stapling Machines (Staplers) or Suturing Machines**, in boxes;
- ⇒ **Swabs, Swab Sticks or Swab-type Applicators**, in boxes;
- ⇒ **Tape**, adhesive, in boxes;
- ⇒ **Tests or Test Kits**, pregnancy or ovulation, in boxes;
- ⇒ **Toothbrushes**, NOI. see Note, item F-NFW, in boxes;

3. Subject 37 — Drugs, Medicines, Toilet Preparations or Personal Care Products Group

- a. It is OD's opinion that toilet preps (item 59420) should not be combined with drugs or medicines. Toilet preps is already a well-established item and viz. listing. Change to full scale density only.
- b. Drugs or medicines may have different liability carriers need to be aware of.

4. Subject 38 — Electrical Equipment Group

- a. Consolidate listings, i.e. electrodes, fans, and remove sub-viz. listings and remove material construction restrictions to simplify the item.
- b. Instead of creating sub-viz. listings in item 61700 for items 63160 and 63300, it is OD's opinion that those two items should be kept and changed to full scale density.
- c. The establishment of 32 new NOTES is unnecessary and they should be reviewed more closely to simplify and reduce the chance of interpretation issues. Some examples are:
 - i. E-NEW and F-NEW (packaging)
 - ii. I-NEW
 - iii. K-NEW
 - iv. Y-NEW
 - v. Z-NEW
 - vi. AD-NEW
 - vii. AF-NEW

5. Subject 5 — Aluminum

- a. Classify specific types of hardware (i.e. bolts, nuts, screws, rivets, nails, spike, tacks) in the Hardware, NOI item to mitigate interpretation issues.
- b. Due to the nature of aluminum articles, amend minimum packaging requirements to "in boxes, crates or drums." Do not allow "in packages."
- c. Do not establish new Notes, items A-NEW through D-NEW as they are not helpful to classifying freight or eliminating interpretations.

⇒A-NEW NOTE—Applies only on cores used to form a void in propellant charges of missiles or missile sections.

⇒B-NEW NOTE—Applies only on articles from the press, produced in one piece by a combination impact and extrusion process.

⇒C-NEW NOTE—Applies only on sheet aluminum which has been slotted or louvered for screening or shading purposes.

⇒D-NEW NOTE—Applies only when the aluminum content is greater than 50 percent by weight.

6. Subject 54 — Hardware Group

- a. Metal hardware should be classified here and NOT under the material (e.g. aluminum).
- b. Toy vehicle axles should be classified in item 84260.
- c. The specific types of caps named in items 93820 and 93840 should be classified in the Caps or Covers, NOI item.
- d. "Fasteners, upholstery panel, steel" in item 94630 should be classified in the Fasteners, NOI item.

- e. Iron home savings banks in item 93120 are no longer manufactured and shipped via LTL so the item should be canceled as obsolete.

7. Subjects 91 and 92: Tobacco

- a. Combine Tobacco, manufactured Tobacco, unmanufactured into a single, concise viz. listing.