

NMFC Docket Subject Number: 101720

Triangle Ink Co.

The NMFC 101720 update from December 2021, which moved from a simpler Class 55 to two new freight classes (Class 65 and Class 85), is a challenge for businesses. Prior to the change, it was easier to estimate shipping costs, as Class 55 was simple to work with for pricing. However, with the new structure, determining whether goods fall under Class 65 or 85 now requires calculating density for each shipment, adding complexity and extra steps.

The new change is expected to further complicate the process of securing consistent rates with freight carriers. As a result, ink manufacturers will face difficulties in estimating shipping costs accurately and consistently, leading to additional costs that will impact profit margins. Our concern is that the proposed changes could further hurt the ink manufacturing industry, leading to price increases for products, which ultimately affects the bottom line.

In short, we want to express our frustration with the increased complexity and costs associated with this NMFC update, particularly in an industry already dealing with financial pressures.

The new classification, removes NMFC 101720 and blankets it under NMFC 101710, resulting in **“13” sub classes vs two currently**. This is extremely complex and makes it very difficult for us, the shipper, to retain rates and discounts with our carriers. Not only that, but it will also affect rates for some customers, that moved from UPS Ground to LTL, thus leaving small businesses in a conundrum deciding which is most cost effective shipping method. This will also have an effect on the costs of our inbound raw materials and outbound finished goods.