

## SUBJECT 2

## SUBJECT 2: Clocks Group, including Watches or Parts thereof

**Re:** Clocks Group, including Watches or Parts thereof**Contact:** Larissa Franklin

FCDC@nmfta.org

**Proponent:** Freight Classification Development Council**Quick View**

*The Quick View feature is not intended to replace contextual information within this document. To understand the potential impact of the recommended changes shown here, please read the full proposal.*

**Subject 2: Clocks Group, including Watches or Parts thereof**

**Quick View:** Ten items related to clocks or watches are canceled with reference to one of three new items.

- Five new Notes established attendant amongst two of the new items
- Note, item 48731 canceled and reestablished
- Five Notes canceled with no further application
- Note, item 196425 canceled with reference to F-NEW
- Clocks Group, item 48650, canceled with no further application
- Item (Rule) 172 modified

**Transportation Characteristics Present:**

- Handling ☒Yes ☐No   Stowability ☒Yes ☐No   Liability ☒Yes ☐No   Density ☒Yes ☐No

**Provisions based on:**

- FCDC's 13-sub density scale
- Height to shortest base dimension ratio
- Modified density scale with class adjustments

## SUBJECT 2

Present Classification Provisions

Item	Description	Class
48650	<b>CLOCKS GROUP:</b> Articles consist of Clocks, Clock Movements or Clock Parts, as described in items subject to this grouping.	
48660	<b>Clock Cases:</b>	
Sub 1	Iron or steel, in boxes or crates .....	85
Sub 2	Wooden, in boxes .....	100
Sub 3	Zinc alloys, in boxes .....	85
48670	<b>Clock Springs</b> , in boxes .....	100
48680	<b>Clock Weights</b> , in boxes .....	77.5
48695	<b>Clocks</b> , advertising, NOI, see Note, item 48696, in boxes .....	250
48696	NOTE—Applies on clocks combined with advertising displays, figures, images, logos or slogans. Advertising may be on the face of the clock or may be otherwise attached to the clock.	
48720	<b>Clocks, Clock Movements or Clock Parts</b> , NOI, in boxes or Package 107F, see Note, item 48721:	
Sub 1	Actual value not exceeding \$50.00 each .....	125
Sub 2	Actual value exceeding \$50.00 each .....	200
48721	NOTE—Shipper must certify on shipping orders and bills of lading at time of shipment the actual value each of the property or the value group embracing the actual value each of the property. If the shipper fails to so certify the actual value, shipment will not be accepted, but if the shipment is inadvertently accepted, charges will initially be assessed on the basis of the class for the highest valuation provided. Upon proof of lower actual value, freight charges will be adjusted accordingly.	
48730	<b>Clocks</b> , floor-standing, see Note, item 48731, in boxes or Packages 107F or 108F .....	200
48731	NOTE—Also applies on <b>Clocks combined with Curio Cabinets</b> .	
48750	<b>Clocks</b> , neon illumination, with or without advertising, secured and suspended in boxes or Package 558 .....	400

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## SUBJECT 2

Present Classification Provisions—Continued

Item	Description	Class
176050	<b>Signs</b> , NOI, prepaid, see Notes, items 176051 and 176052, in boxes, crates or Packages 1160 or 2337, see Note, item 176053, subject to Item 170 and having a density in pounds per cubic foot of:	
Sub 1	Less than 1.....	400
Sub 2	1 but less than 2.....	300
Sub 3	2 but less than 4.....	250
Sub 4	4 but less than 6.....	175
Sub 5	6 but less than 8.....	125
Sub 6	8 but less than 10.....	100
Sub 7	10 but less than 12.....	92.5
Sub 8	12 but less than 15.....	85
Sub 9	15 but less than 22.5.....	70
Sub 10	22.5 but less than 30.....	65
Sub 11	30 but less than 35.....	60
Sub 12	35 but less than 50.....	55
Sub 13	50 or greater.....	50
176051	NOTE—Not Involved.	
176052	NOTE—Not Involved.	
176053	NOTE—Neon signs may also be shipped in Package 546.	
196380	<b>Watch Cases</b> , nickel or nickel plated, in boxes.....	100
196400	<b>Watch or Clock Crystals</b> , machined, polished or bevelled, in boxes.....	125
196420	<b>Watches or Watch Movements</b> , see Note, item 196425, value declared in writing by the shipper, or agreed upon in writing as the released value of the property, in accordance with the following, see Notes, items 196422 and 196424:	
Sub 1	Released value not exceeding \$2.00 each, in boxes.....	125
Sub 2	Released value exceeding \$2.00 each, but not exceeding \$10.00 each, in boxes.....	300
Sub 3	If the shipper fails or declines to execute the statement shown below or designates a value exceeding \$10.00 per watch or watch movement, shipment will not be accepted, but if the shipment is inadvertently accepted, charges initially will be assessed on basis of the class for the highest value provided. Upon proof of lower actual value, the freight charges will be adjusted to those that would apply if the shipment had been released to the amount of its actual value.	
196422	NOTE—Boxes must be securely closed to prevent pilferage.	

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Present Classification Provisions—Continued

Item	Description	Class
196424	<p>NOTE—The released value must be entered on the shipping order and bill of lading in the following form:</p> <p><i>"The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding _____ per watch or watch movement."</i></p> <p>(Classes herein based on released value have been authorized by the Interstate Commerce Commission in Released Rates Order No. MC-615 of June 7, 1965, as amended September 27, 1982.)</p>	
196425	<p>NOTE—Also applies on <b>Horological Goods</b> consisting of watches or watch movements.</p>	

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## SUBJECT 2

Present Classification Provisions—Concluded

## Item 172

**LIMITATION OF CARRIER LIABILITY WHERE VALUE IS NOT DECLARED BY SHIPPER**

Where item 47500, 56165, 63025, 70080, 88160, 99400, 100240, 107830, 116030, 136500, 164900, 168960 or 196420 of this Classification applies, and shipper fails to declare a value as required by those provisions, the shipment will not be accepted, but if the shipment is inadvertently accepted, the carrier's liability shall be limited as follows:

ITEM NO.	DESCRIPTION	VALUE LIMITATION
47500	<b>Ceramicware, China, Earthenware, Porcelain or Stoneware</b> , NOI	\$1.70 per pound
56165	<b>Paintings or Pictures</b> , NOI, framed or unframed, with or without glass	\$25.00 per pound
63025	<b>Semiconductors, viz.: Devices</b> , NOI; <b>Diodes; Rectifiers; Thermistors; Transistors</b>	\$20.00 per pound
70080	<b>Flatware, Dresserware or Holloware</b> , sterling silver; or <b>Flatware, Dresserware or Holloware</b> , with sterling silver parts, such as backs, covers, frames, handles or tops	\$5.00 per pound
88160	<b>Glassware</b> , NOI	\$19.00 per pound
99400	<b>Hides, Pelts or Skins</b> , dressed or tanned or not dressed nor tanned, NOI, dry	\$7.50 per pound
100240	<b>Household Goods, Personal Effects or Military Baggage</b> , other than shipments moving under the U.S. Department of Defense Personal Property Program	\$0.10 per pound
107830	<b>Jewelry</b> , costume or novelty, made of materials other than solid or filled precious metals, not mounted nor set with precious stones	\$5.00 per pound
116030	<b>Machines, Systems or Devices</b> , data processing, or <b>Components, Parts or Peripherals thereof</b>	\$25.00 per pound
136500	<b>Metal</b> , NOI or <b>Metal Alloys</b> , NOI	\$5.00 per pound
164900	<b>Radioactive Materials</b>	\$25.00 per pound
168960	<b>Records, Documents or Files</b> , office	\$0.25 per pound
196420	<b>Watches or Watch Movements</b>	\$10.00 each

Where the provisions of other tariffs apply, and those provisions specify a limitation of the carrier's liability absent a release or value declaration by the shipper, the carrier's liability shall be limited to the extent provided by such applicable provisions when the shipper does not make the requisite or specified release or value declaration.


## SUBJECT 2

Proposed Classification Provisions

Item	Description	Class
48650	<b>CLOCKS GROUP</b> , etc.....	⇒Cancel; no further application
48660	<b>Clock Cases</b> , etc .....	⇒Cancel; see item F-NEW
48670	<b>Clock Springs</b> , etc .....	⇒Cancel; see item F-NEW
48680	<b>Clock Weights</b> , etc .....	⇒Cancel; see item F-NEW
48695	<b>Clocks</b> , advertising, NOI, etc .....	⇒Cancel; see item F-NEW
48696	NOTE—⇒Cancel; no further application.	
48720	<b>Clocks, Clock Movements or Clock Parts</b> , NOI, etc .....	⇒Cancel; see item F-NEW
48721	NOTE—⇒Cancel; no further application.	
48730	<b>Clocks</b> , floor-standing, etc.....	⇒Cancel; see item A-NEW
48731	NOTE—⇒Cancel; see item B-NEW.	
48750	<b>Clocks</b> , neon illumination, etc .....	⇒Cancel; see item G-NEW
176050	<b>Signs</b> , NOI, prepaid, see Notes, items 176051 and 176052, ⇒in boxes, crates or Packages 1160 or 2337, subject to Item 170 and having a density in pounds per cubic foot of:	
Sub 1	Less than 1.....	400
Sub 2	1 but less than 2.....	300
Sub 3	2 but less than 4.....	250
Sub 4	4 but less than 6.....	175
Sub 5	6 but less than 8.....	125
Sub 6	8 but less than 10.....	100
Sub 7	10 but less than 12.....	92.5
Sub 8	12 but less than 15.....	85
Sub 9	15 but less than 22.5.....	70
Sub 10	22.5 but less than 30.....	65
Sub 11	30 but less than 35.....	60
Sub 12	35 but less than 50.....	55
Sub 13	50 or greater .....	50
176051	NOTE—No Change.	
176052	NOTE—No Change.	
176053	NOTE—⇒Cancel; no further application.	
196380	<b>Watch Cases</b> , nickel or nickel plated, etc .....	⇒Cancel; see item F-NEW
196400	<b>Watch or Clock Crystals</b> , machined, polished or bevelled, etc .....	⇒Cancel; see item F-NEW

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Proposed Classification Provisions—Continued

Item	Description	Class
196420	<b>Watches or Watch Movements</b> , etc .....⇒Cancel; see item F-NEW	
196422	NOTE—⇒Cancel; no further application.	
196424	NOTE—⇒Cancel; no further application.	
196425	NOTE—⇒Cancel; see item F-NEW.	
⇒A-NEW	 <b>Clocks</b> , floor-standing, <b>or Grandfather Clocks</b> , see Note, item B-NEW, in boxes, crates or Packages 107F or 108F, see Notes, items C-NEW and D-NEW:	
Sub 1	Having a height two times or greater than the shortest base dimension, see Note, item E-NEW, subject to Item 170 and having a density in pounds per cubic foot of:	
Sub 2	Less than 4.....	500
Sub 3	4 or greater .....	250
Sub 4	Other than as set forth in sub 1, subject to Item 170 and having a density in pounds per cubic foot of:	
Sub 5	Less than 4.....	300
Sub 6	4 or greater .....	175
⇒B-NEW	NOTE—Also applies on <b>Clocks combined with Curio Cabinets</b> .	
⇒C-NEW	NOTE—Articles must be protected by packing forms or other packaging materials necessary to afford adequate protection against damage.	
⇒D-NEW	NOTE—Articles tendered for shipment on lift truck skids, pallets or platforms must be securely fastened to and must not overhang the edges of the lift truck skid, pallet or platform deck.	
⇒E-NEW	NOTE—When tendered for shipment on lift truck skids, pallets or platforms, the height and base dimensions will include the lift truck skid, pallet or platform.	

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## SUBJECT 2

Proposed Classification Provisions—Continued

Item	Description	Class
⇒F-NEW	<b>Clocks, Watches or Parts thereof, viz.:</b> <b>Cases</b> , clock or watch, in boxes or crates; <b>Clock Springs</b> , in boxes; <b>Clock Weights</b> , in boxes; <b>Clocks or Parts thereof</b> , NOI, in boxes, crates or Package 107F; <b>Crystals</b> , clock or watch, in boxes; <b>Horological Goods</b> , NOI, in boxes; <b>Movements</b> , clock or watch, NOI, in boxes; <b>Watches or Parts thereof</b> , NOI, in boxes; Subject to Item 170 and having a density in pounds per cubic foot of:	
Sub 1	Less than 1 .....	400
Sub 2	1 but less than 2 .....	300
Sub 3	2 but less than 4 .....	250
Sub 4	4 but less than 6 .....	175
Sub 5	6 but less than 8 .....	125
Sub 6	8 but less than 10 .....	100
Sub 7	10 but less than 12 .....	92.5
Sub 8	12 but less than 15 .....	85
Sub 9	15 but less than 22.5 .....	70
Sub 10	22.5 but less than 30 .....	65
Sub 11	30 but less than 35 .....	60
Sub 12	35 but less than 50 .....	55
Sub 13	50 or greater .....	50
⇒G-NEW	 <b>Signs or Clocks</b> , neon or faux neon, not required by the U.S. Department of Transportation to bear a Hazard Class or Hazard Division label or placard, see Note, item H-NEW, in boxes, crates or Packages 546 or 558, see Note, item I-NEW, subject to Item 170 and having a density in pounds per cubic foot of:	
Sub 1	Less than 4 .....	300
Sub 2	4 but less than 6 .....	200
Sub 3	6 or greater .....	150
⇒H-NEW	NOTE—Does not apply on materials regulated by the U.S. Department of Transportation as hazardous and required to bear a Hazard Class or Hazard Division label or placard. For classes applicable to such hazardous materials, see provisions elsewhere in this Classification.	
⇒I-NEW	NOTE—Articles must be protected by interior packing forms or packaging materials necessary to afford adequate protection against damage.	



## SUBJECT 2

**Proposed Classification Provisions—Concluded**

## Item 172

**LIMITATION OF CARRIER LIABILITY WHERE VALUE IS NOT DECLARED BY SHIPPER**

Where item 47500, 56165, 63025, 70080, 88160, 99400, 100240, 107830, 116030, 136500, 164900, 168960 or ~~196420~~ of this Classification applies, and shipper fails to declare a value as required by those provisions, the shipment will not be accepted, but if the shipment is inadvertently accepted, the carrier's liability shall be limited as follows:

ITEM NO.	DESCRIPTION	VALUE LIMITATION
47500	<b>Ceramicware, China, Earthenware, Porcelain or Stoneware</b> , NOI	\$1.70 per pound
56165	<b>Paintings or Pictures</b> , NOI, framed or unframed, with or without glass	\$25.00 per pound
63025	<b>Semiconductors, viz.: Devices</b> , NOI; <b>Diodes; Rectifiers; Thermistors; Transistors</b>	\$20.00 per pound
70080	<b>Flatware, Dresserware or Holloware</b> , sterling silver; or <b>Flatware, Dresserware or Holloware</b> , with sterling silver parts, such as backs, covers, frames, handles or tops	\$5.00 per pound
88160	<b>Glassware</b> , NOI	\$19.00 per pound
99400	<b>Hides, Pelts or Skins</b> , dressed or tanned or not dressed nor tanned, NOI, dry	\$7.50 per pound
100240	<b>Household Goods, Personal Effects or Military Baggage</b> , other than shipments moving under the U.S. Department of Defense Personal Property Program	\$0.10 per pound
107830	<b>Jewelry</b> , costume or novelty, made of materials other than solid or filled precious metals, not mounted nor set with precious stones	\$5.00 per pound
116030	<b>Machines, Systems or Devices</b> , data processing, or <b>Components, Parts or Peripherals thereof</b>	\$25.00 per pound
136500	<b>Metal</b> , NOI or <b>Metal Alloys</b> , NOI	\$5.00 per pound
164900	<b>Radioactive Materials</b>	\$25.00 per pound
168960	<b>Records, Documents or Files</b> , office	\$0.25 per pound
<del>196420</del>	<del>Watches or Watch Movements</del>	<del>\$10.00 each</del>

Where the provisions of other tariffs apply, and those provisions specify a limitation of the carrier's liability absent a release or value declaration by the shipper, the carrier's liability shall be limited to the extent provided by such applicable provisions when the shipper does not make the requisite or specified release or value declaration.

**SUBJECT 2****Analysis****Introduction**

There are numerous items subject to the Clocks Group that name particular types of clocks or parts thereof, and these provisions can be difficult to interpret, apply, or verify. Watches are comparable to clocks in terms of function, and there are several watch or watch parts items in the NMFC that are also included in this proposal, as shown in the Present Provisions herein. There are three primary groupings of commodities involved in this proposal, as shown in the Proposed Provisions herein. The three groupings of articles will hereinafter be referred to as the following: clocks, watches or parts thereof, NOI; floor-standing or grandfather clocks<sup>1</sup>; or neon or faux-neon signs<sup>2</sup> or clocks.

**Transportation Characteristics**

**Density**—Overall, the information of record includes 4,915 density figures, which were obtained from the FCDC's Density Study<sup>3</sup>.

The graphs and the tables on the following pages show the frequency distributions, density ranges, averages, and concentrations of density observations for the proposed provisions.

**Clocks, Watches or Parts thereof, NOI**

The information of record on commodities moving under items 48660, 48670, 48680, 48695, 48720, 196380, 196400, and 196420 includes 4,411 density observations. The densities range from 0.24 to 37.58 pcf, with an overall average density of 6.21 pcf. As shown in the graph on the following page, there is a right-skewed bell curve, with a predominant peak in the 4 but less than 6 pcf interval.

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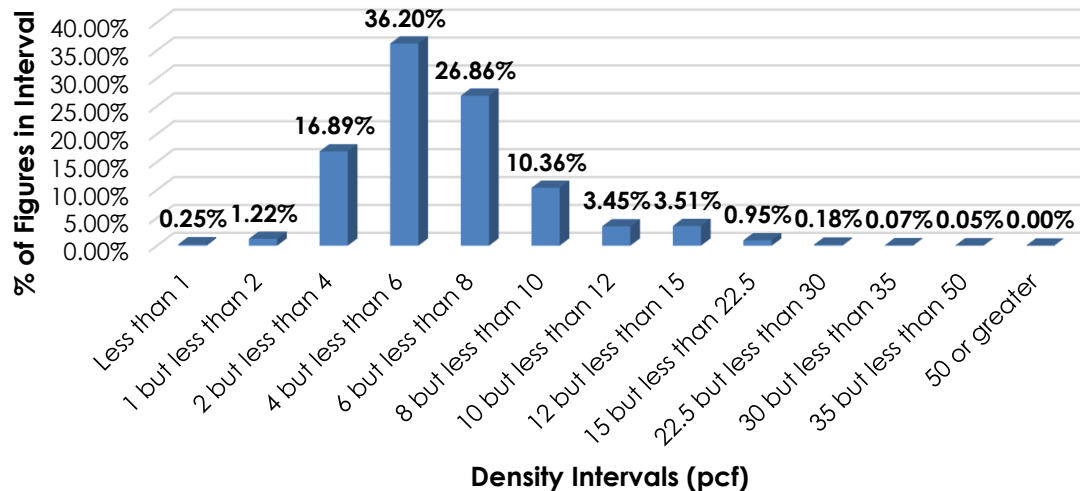
<sup>1</sup> As tendered to carriers, many floor-standing or grandfather clocks are considered "unstable." For the purposes of this analysis, the term "unstable" refers to articles having a height two times or greater than the shortest base dimension, as packaged for shipment, including, when present, the lift truck skid, pallet, or platform.

<sup>2</sup> Given the comparable inherent nature of neon or faux-neon signs, this proposal also examines the transportation characteristics of those specific articles identified moving under item 176050.

<sup>3</sup> The Density Study is part of an ongoing effort by the FCDC to collect information on actual shipments; it is not tied to any particular research project, nor does it target any particular product category. Carriers that choose to participate in the study periodically submit shipment data captured through their respective freight auditing programs. The data is identified by NMFC item, and only verifiable data points, which include the weight and the dimensions and/or cube of the shipping unit involved, are used.

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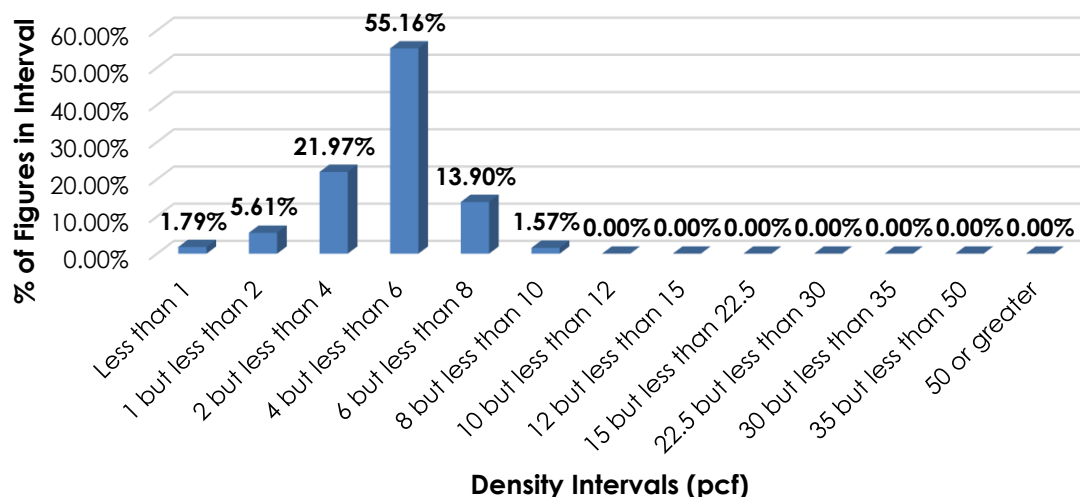
### Clocks, Watches or Parts thereof, NOI Frequency Distribution



### Floor-Standing or Grandfather Clocks

The information of record for commodities moving under item 48730 includes 446 density observations. The densities range from 0.31 to 9.68 pcf, with an average density of 4.58 pcf. As shown in the graph below, the density distribution is right-skewed, with a distinct peak in the 4 but less than 6 pcf interval. A single density break at 4 pcf reflects the spread and modality of the distribution.

### Floor-Standing or Grandfather Clocks Frequency Distribution



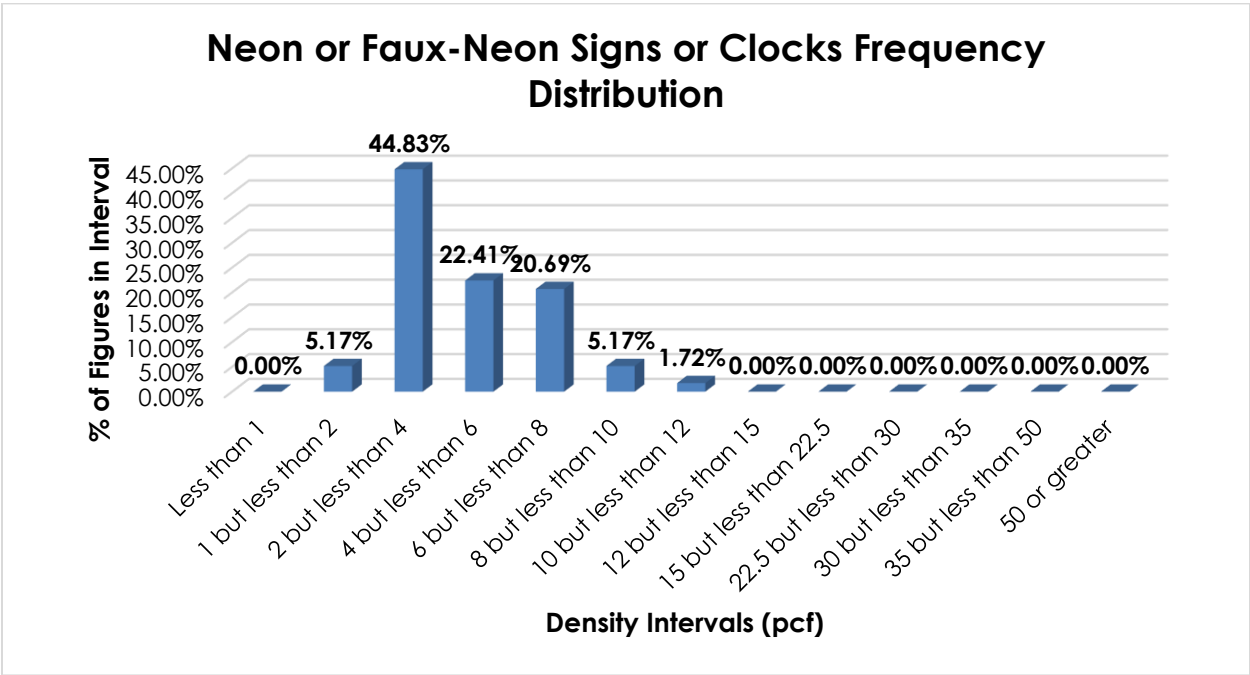
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When the data is evaluated based on the proposed density break at 4 pcf, the density ranges and averages shown in the table below emerge.

Density Group (pcf)	Density Range (pcf)	Average Density (pcf)
Less than 4	0.31 – 3.98	2.74
4 or greater	4.00 – 9.68	5.35

Neon or Faux-Neon Signs or Clocks

The information of record for commodities moving under items 48750 and 176050 includes 58 density observations. The densities range from 1.27 to 10.03 pcf, with an overall average density of 4.87 pcf. As shown in the graph below, there is a distinct peak in the 2 but less than 4 pcf interval, and uniform peaks between 4 and 8 pcf. Density breaks at 4 and 6 pcf reflect the spread and modality of the distribution.



When the data is evaluated based on the proposed density breaks at 4 and 6 pcf, the density ranges and averages shown in the table below emerge.

Density Group (pcf)	Density Range (pcf)	Average Density (pcf)
Less than 4	1.27 – 3.98	3.08
4 but less than 6	4.11 – 5.99	5.47
6 or greater	6.04 – 10.03	7.62

**SUBJECT 2****Handling—****Clocks, Watches or Parts thereof, NOI**

Clocks, Watches or Parts thereof, NOI are typically tendered in boxes or crates. There is no indication of unusual or significant handling considerations.

**Floor-Standing or Grandfather Clocks**

Stable handling units are typically tendered in boxes or crates or may be tendered in one of the specified numbered packages. When packaged fully enclosed in boxes or crates, or one of the numbered packages, handling will be comparable to that of other like-packaged, general boxed freight and will generally not pose any handling issues.

Unstable handling units, however, present significant handling concerns. Unstable articles are generally tendered in boxes, which may or may not be secured on lift truck skids or pallets. Shipments often include precautionary markings or shipper instructions alerting the carrier that the articles are “Top Heavy” or “Fragile” and must be handled with care.

Unstable handling units may need to be physically secured to the forklift in a certain manner (e.g., against the forklift mast) to ensure that the freight does not tip over while loading, unloading, or being moved on the dock, and certain equipment or additional personnel may be necessary to avoid damaging these products or other freight. Furthermore, extra care and attention should be taken to ensure unstable handling units do not come into contact with the ceiling of the vehicle due to their height.

**Neon or Faux-Neon Signs or Clocks**

Neon or faux-neon signs or clocks are typically tendered in boxes or crates or may be tendered in one of the specified numbered packages. These commodities are inherently fragile, as they are composed of either glass and gas (neon) or lightbulbs (faux-neon). Thus, due to the nature of these products, extra care and attention in handling is imperative if damage is to be avoided.

**Stowability—****Clocks, Watches or Parts thereof, NOI**

There have been no reports of unusual or significant stowing issues.

**Floor-Standing or Grandfather Clocks**

For stable handling units, when packaged fully enclosed in boxes or crates with proper interior protection, stowing will be comparable to that of other like-packaged freight or general boxed freight and will generally not pose any negative stowability considerations.

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Unstable handling units, however, pose significant stowability issues. Generally, special equipment or additional personnel are necessary to avoid damage to these products or other freight when stowing in the vehicle. Even if unstable handling units are secured on lift truck skids or pallets, care must be taken when stowing these articles. Due to their top-heavy nature and inherent propensity to tip, extra care should be taken to properly secure the articles inside the vehicle to prevent them from tipping, resulting in damage to the product itself and potentially other freight with which stowed. The configuration and instability of these units also generally require that the articles be secured to lift truck skids or pallets that are wider than what may be necessary of other freight with the same dimensions of length and width. Occasionally, there may be external protrusions, which can further complicate the carriers' ability to properly stow these articles, as they do not provide support for top or adjacent freight.

**Neon or Faux-Neon Signs or Clocks**

Due to the fragile nature of the articles, carriers must ensure that only compatible freight is stowed adjacent to or on top of handling units of neon or faux-neon signs or clocks, thus requiring extra care, attention, and consideration on the part of the carrier. Additionally, as a result of their fragility, the use of load decks and/or dunnage may be necessary to minimize the potential for damage and efficiently use the available vehicle space.

**Liability—****Clocks, Watches or Parts thereof, NOI**

The involved commodities are not perishable, hazardous in nature, unusually liable to damage, nor likely to damage other freight.

**Floor-Standing or Grandfather Clocks**

Floor-standing or grandfather clocks are not perishable or hazardous in nature. Stable handling units are not unusually liable to damage when tendered in boxes or crates, with sufficient interior protective packaging, and they are not likely to damage other freight.

However, unstable handling units are more vulnerable to damage even when tendered in compliant packaging. If an unstable handling unit tips over, not only can the product itself be damaged, but it may also significantly damage other freight or injure freight handlers.

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Neon or Faux-Neon Signs or Clocks

Neon or faux-neon signs or clocks are not perishable, hazardous in nature<sup>4</sup>, nor likely to damage other freight. As previously discussed, these types of signs or clocks are inherently fragile and susceptible to damage because of their glass construction or use of light bulbs, and as a consequence, extra care and attention must be taken in handling and stowing these products.

Conclusion

Clocks, Watches or Parts thereof, NOI

Based on the foregoing analysis, the involved articles do not present any unusual or significant handling, stowing, or liability issues, and density has been determined to be the primary transportation characteristic. Thus, this proposal would cancel items 48660, 48670, 48680, 48695, 48720, 196380, 196400, 196420, and the articles named in Note, item 195425, with reference to a new item, naming "Clocks, Watches or Parts thereof," with a "viz." format, and classes predicated on the FCDC's 13-subprovision density scale<sup>5</sup>.

Floor-Standing or Grandfather Clocks

Based on the foregoing analysis, this proposal would cancel item 48730 with reference to a new item, naming "Clocks, floor-standing, or Grandfather Clocks." The new item would have one set of classes applying on stable handling units, predicated on density with a single break at 4 pcf<sup>6</sup>, as shown in the table below, reflective of the respective average densities for each grouping and consistent with FCDC density guidelines. It would assign another set of classes with the identical density groupings, but two classes higher than that associated with the density guidelines for unstable handling units due to the significant, identified negative handling, stowability and liability characteristics.

Density Group (pcf)	Average Density (pcf)	FCDC Minimum Average Density Guideline (pcf)	Class Based on FCDC Density Guidelines	Class Adjustment Based on Handling, Stowing, and Liability Considerations
Less than 4	2.74	2	300	500
4 or greater	5.35	5	175	250

Also, to highlight these commodities' handling, stowing, and liability issues, the "👉" symbol would be added to the description of the new item.

<sup>4</sup> Neon is an inert gas and though some neon signs or clocks may contain traces of mercury, the proposed provisions prohibit those signs or clocks that are labeled or placarded as hazardous.

<sup>5</sup> The FCDC's standard 13-subprovision density scale includes reference to Item (Rule) 170, the inadvertence clause.

<sup>6</sup> The density provisions would include reference to Item (Rule) 170, the inadvertence clause.

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Note, item 48731 would be canceled and reestablished as an attendant Note to the new item, and one new Note would be established to clarify whether or not a handling unit is unstable.

Additionally, FCDC packaging policy calls for establishing and maintaining packaging specifications as necessary to ensure that freight is adequately protected and can be handled and stowed in a manner that is reasonably safe and practicable so as to withstand the normal rigors of the less-than-truckload environment. As such, to mitigate the chance of damage, two additional packaging Notes would be established.

Neon or Faux-Neon Signs or Clocks

Based on the foregoing analysis, this proposal would also cancel item 48750 with reference to a new item<sup>7</sup>, naming “Signs or Clocks, neon or faux neon,” with additional language restricting the new item’s application to materials not required by the U.S. Department of Transportation (DOT) to bear a Hazard Class or Hazard Division label or placard. The provisions would be based on density intervals of less than 4 pcf, 4 but less than 6 pcf, and 6 pcf or greater<sup>6</sup>. Due to the identified negative handling, stowability, and liability considerations, a one-class adjustment is proposed, as shown in the table below.

Density Group (pcf)	Average Density (pcf)	Class Based on FCDC Density Guidelines	Class Adjustment Based on Handling, Stowing, and Liability Considerations
Less than 4	3.08	250	300
4 but less than 6	5.47	175	200
6 or greater	7.62	125	150

Also, to highlight these commodities’ handling, stowing, and liability issues, the “👉” symbol would be added to the description of the new item.

Moreover, an attendant Note would be established, clarifying that the new item does not apply on materials regulated by the DOT as hazardous and required to bear a Hazard Class or Hazard Division label or placard. The Note would direct the Classification user to other items for classes applicable to such hazardous materials.

Furthermore, FCDC packaging policy calls for establishing and maintaining packaging specifications as necessary to ensure that freight is adequately protected and can be handled and stowed in a manner that is reasonably safe and practicable so as to withstand the normal rigors of the less-than-truckload environment. As such, to mitigate the chance of damage, an additional packaging Note would be established.

<sup>7</sup> The new item would also apply on neon or faux-neon signs, as analyzed and shown in the analysis.



**SUBJECT 2****Additional Considerations**

Notes, items 48696, 48721, 176053, 196422, and 196424 would be canceled with no further application, as would the Clocks Group, item 48650.

Item (Rule) 172 would also be amended to remove reference to item 196420.