

<b>Subject</b>	<b>Subject Description</b>	<b>Feedback</b>
1	Item (Rule) 640	The proposed Rule 640 appears unclear when applied to density-based commodities, since their freight class depends on the actual dimensions and weight at the time the freight is tendered. While section 3b only requires shippers to list the items on the BOL for each handling unit, this does not resolve how a shipper can determine the correct class for a density-based commodity before it is fully packaged, especially when it is combined with other items on a mixed skid. In practice, once a density-based item is part of a mixed handling unit, it seems unavoidable that the unit's class would have to be determined by the overall density under the 13-subprovision, effectively aligning with the approach outlined in proposed section 3a and raising questions about how section 3b would function differently
1	Item (Rule) 640	Following the Docket 2026-1 webinar, we recommend clarifying NMFC Item 640 to focus classification on handling units (not shipments), provide clear guidance when weight and/or dimensions are verified, align "standard" parcel thresholds with practical pallet/trailer dimensions (allowing 96" height), and reduce packing-slip requirements to avoid undue shipper burden while improving accuracy when carriers measure freight.
1	Item (Rule) 640	LTL carriers inspect and rate shipments based on total dimensions and gross weight (not itemized commodities), so mixed, hazmat, or palletized loads are often reclassified and charged as a whole, making BOL itemization, TMS rates, and commodity-level adjustments unreliable and frequently overridden by tariffs or pricing agreements.
1	Item (Rule) 640	Carriers should not remove packing lists during inspections, as they are often not properly reattached, leading to customer penalties for shippers even when the packing list was originally applied correctly at origin.
1	Item (Rule) 640	Requiring additional BOL language and packing slips on fully itemized shipments adds unnecessary complexity and penalizes compliant shippers without clearly improving rating accuracy or consistency across carriers.
3	Drugs, Medicines, Toilet Preparations or Personal Care Products Group	We have noted that this commodity group as a whole has been increasing in value while simultaneously increasing claims exposure due to environmental factors and including complaints of "contamination." Claimants are often trying to reject and claim an entire shipment due to limited damage or random exposure. Demands on shipping compliance are including sanitary or sterile conditions not available within normal LTL shipping. We believe this adds potential concerns related to stowability and liability.
5	Building Metalwork Group	Many of the articles named in this grouping are oversized/overlength, non-stackable for transport along with being custom made for jobs. Slight mars or imperfections are resulting in rejection or high repair costs. Deliveries are often difficult to job sites and with items too large to fit on a liftgate or be handled with driver pallet jack. These present concerns for handleability, stowability and liability.