

**SUBJECT 17**

**Re:** Fenders or Bumpers, boat or dock — Items 68090 and 68095

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**Proponent:** Freight Classification Development Council

**Present Classification Provisions**

Item	Description	Class
68090	<b>Fenders or Bumpers</b> , boat or dock, NOI, loose or in packages, 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 or greater.....	60
68095	<b>Fenders or Bumpers</b> , boat or dock, loose or in packages, having a density in pounds per cubic foot of 30 or greater, see Note, item 68096.....	55
68096	NOTE—Density must be shown on shipping orders and bills of lading at time of shipment. If density is not shown and shipment is inadvertently accepted, class will initially be assessed under the provisions of item 68090, naming 'Fenders or Bumpers, boat or dock, NOI.' Upon satisfactory proof of actual density, class will be adjusted accordingly.	

**Proposed Classification Provisions**

Item	Description	Class
⇒A-NEW	<b>Bumpers or Fenders</b> , boat or dock, NOI, in packages, subject to Item 170 and having a density in pounds per cubic foot of:	
Sub 1	Less than 6.....	200
Sub 2	6 but less than 15.....	100
Sub 3	15 but less than 30.....	70
Sub 4	30 or greater.....	55
⇒B-NEW	NOTE—Applies on bumpers or fenders for use in marine, freight dock or warehouse applications.	
68090	<b>Fenders or Bumpers</b> , boat or dock, NOI, etc.....	⇒Cancel; see item A-NEW
68095	<b>Fenders or Bumpers</b> , boat or dock, etc.....	⇒Cancel; see item A-NEW
68096	NOTE—⇒Cancel; no further application.	

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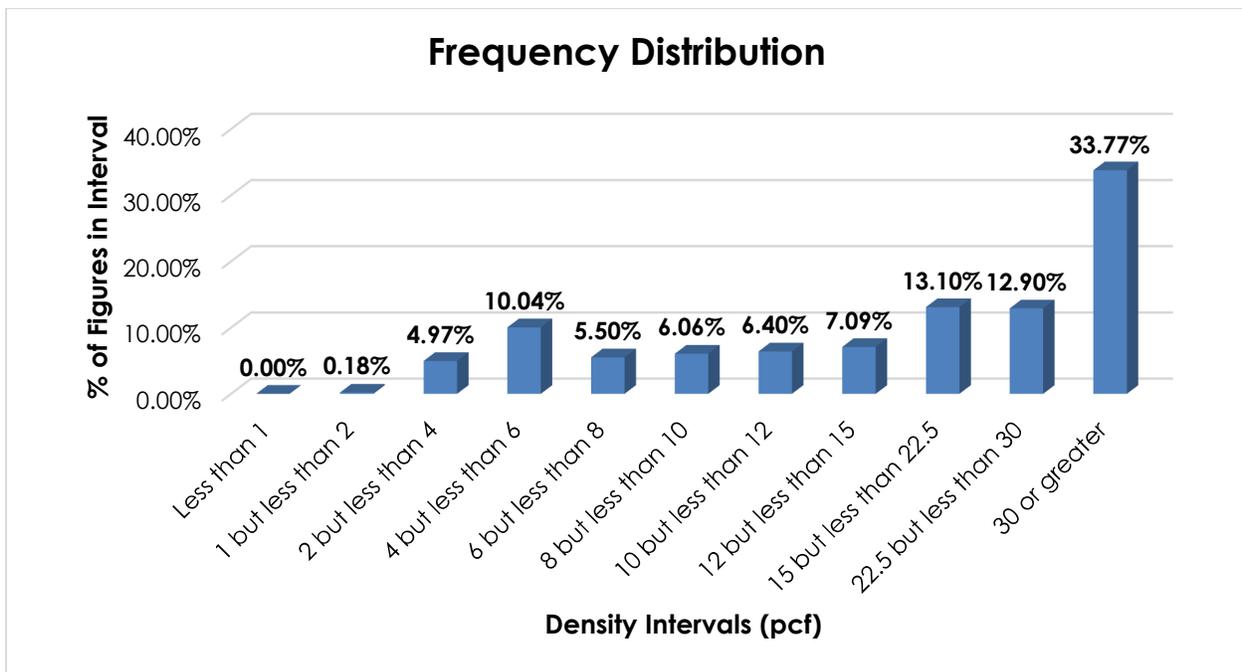
**Analysis**

**Introduction**

During a review of the packaging requirements for boat or dock fenders or bumpers, as named in items 68090 and 68095, it was found that the current class assignments are no longer reflective of the products' transportation characteristics.

**Transportation Characteristics**

**Density**—The information of record includes 6,704 density observations obtained from the FCDC's Density Study<sup>1</sup>. The densities range from 1.52 to 110.82 pcf, with an overall average density of 25.39 pcf. As shown in the graph below, the density distribution is left-skewed, with clustered peaks around the average and a secondary peak in the 4 but less than 6 pcf interval. Nearly 60% of the figures are 15 pcf or greater, and almost 34% are 30 pcf or greater. Density breaks at 6, 15 and 30 pcf address the spread and modality of the distribution.



When the data is evaluated based on the proposed density breaks at 6, 15 and 30 pcf, the density ranges and averages shown in the table on the following page are calculated.

<sup>1</sup> The Density Study is part of an ongoing effort by the FCDC to collect information on actual shipments across all product categories handled by the LTL industry. Carriers that choose to participate in the Study periodically submit shipment data captured through their respective freight auditing programs. The FCDC uses verifiable data points, identified by NMFC item, that include the weight and the dimensions and/or cube of the shipping unit.

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Density Group (pcf)	Density Range (pcf)	Average Density (pcf)
Less than 6	1.52 – 5.99	4.29
6 but less than 15	6.00 – 14.99	10.31
15 but less than 30	15.00 – 29.99	22.37
30 or greater	30.00 – 110.82	48.38

**Handling, Stowability and Liability**—There have been no reports of unusual or significant handling, stowability or liability concerns.

**Conclusion**

Based on the foregoing analysis, items 68090 and 68095 would be canceled with reference to a new item, naming “Bumpers or Fenders, boat or dock, NOI,” in the interest of clarification and simplification. The new item would assign classes predicated on density breaks at 6, 15 and 30 pcf<sup>2</sup>. The average densities and classes, per FCDC guidelines, for each grouping are shown in the table below.

Density Group (pcf)	Average Density (pcf)	FCDC Minimum Average Density Guideline (pcf)	Class Based on FCDC Density Guidelines
Less than 6	4.29	4	200
6 but less than 15	10.31	9	100
15 but less than 30	22.37	15	70
30 or greater	48.38	35	55

A new Note would be concurrently established to clarify the application of the item.

FCDC packaging policies state the FCDC is to maintain packaging rules and 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, the new item would require the involved products to be shipped “in packages,” and the allowance for “loose” shipments would be removed.

<sup>2</sup> The density provisions would include reference to Item (Rule) 170, the inadvertence clause.