

**SUBJECT 18**

**Re:** Wood Sawing Machines (Saws and Engines combined), portable, including Chain Saws — Item 133250

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**Proponent:** Freight Classification Development Council

**Present Classification Provisions**

Item	Description	Class
	<b>MACHINERY GROUP:</b> subject to item 114000	
133250	<b>Wood Sawing Machines (Saws and Engines combined),</b> portable, NOI:	
Sub 1	Chain type ( <b>Chain Saws</b> ), with or without cutter bar, in boxes or crates, or power unit and chain in boxes or crates and cutter bar detached and mounted on board or wrapped in fiberboard .....	85
Sub 2	Other than chain type:	
Sub 3	SU, saw blades detached and crated inside or completely protected by boxing or crating, or mounted on boards.....	100
Sub 4	KD, engine dismounted, saw blades detached and completely protected by boxing or crating, or mounted on boards.....	85

**Proposed Classification Provisions**

Item	Description	Class
	<b>MACHINERY GROUP:</b> subject to item 114000	
⇒NEW	<b>Saws,</b> power operated, portable, NOI, including <b>Portable Sawmill Machines or Chainsaws:</b>	
Sub 1	In boxes or crates, subject to Item 170 and having a density in pounds per cubic foot of:	
Sub 2	Less than 8 .....	175
Sub 3	8 but less than 12 .....	100
Sub 4	12 or greater.....	70
Sub 5	In packages other than boxes or crates, subject to Item 170 and having a density in pounds per cubic foot of:	
Sub 6	Less than 8 .....	200
Sub 7	8 but less than 12 .....	110
Sub 8	12 or greater.....	77.5
133250	<b>Wood Sawing Machines (Saws and Engines combined),</b> portable, NOI, etc .....	⇒Cancel; see item NEW

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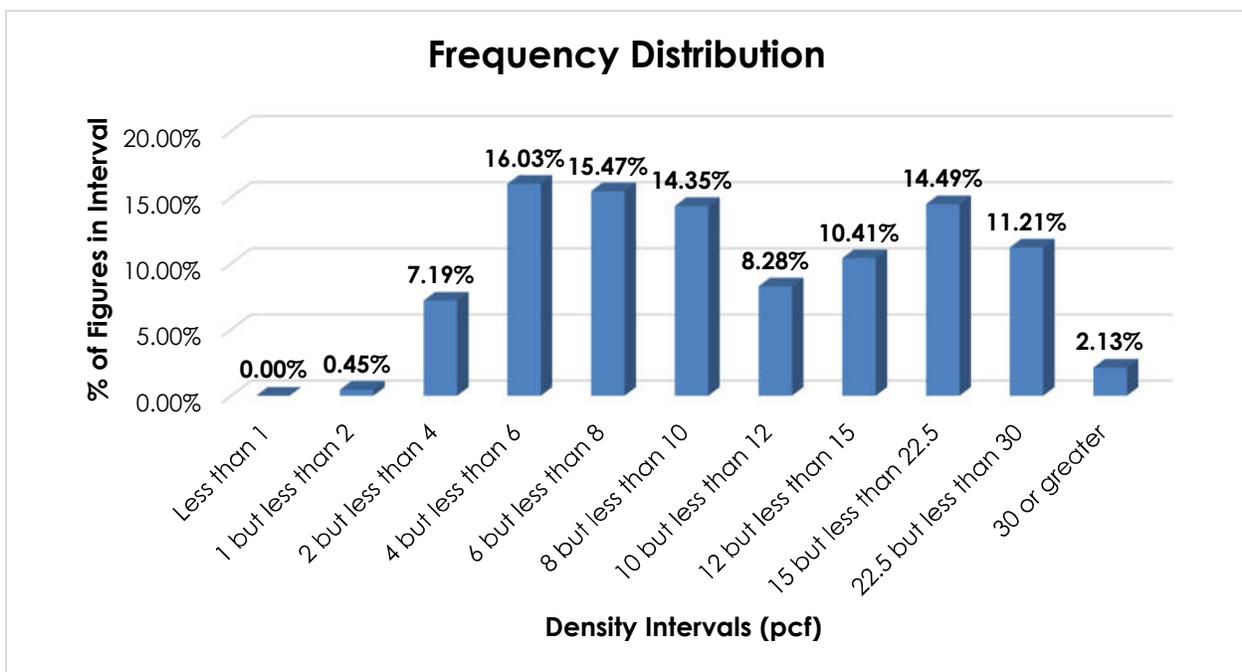
**Analysis**

**Introduction**

This proposal is based on the information developed through Research Project 1345, which was initiated to review the transportation characteristics of portable wood sawing machines, including chainsaws, as encompassed by item 133250. Additionally, it was found that there are interpretation questions regarding portable saws used to cut materials other than wood.

**Transportation Characteristics**

**Density**—The information of record includes 2,864 density observations submitted by carriers, collected on dock surveys and obtained from the FCDC's Density Study<sup>1</sup>. The densities range from 1.11 to 46.08 pcf, with an overall average density of 11.94 pcf. The graph below shows uniform peaks between 4 and 10 pcf, as well as a distinct peak in the 15 but less than 22.5 pcf interval. Density breaks at 8 and 12 pcf represent a roughly equal divide of the data. This addresses both the modality and spread of the distribution.



When the data is evaluated based on the proposed density breaks, the density ranges and averages shown in the table on the following page emerge.

<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 8	1.11 – 7.99	5.39
8 but less than 12	8.00 – 11.99	9.69
12 or greater	12.00 – 46.08	19.98

**Handling**—The involved commodities may be shipped in boxes or crates, or in packages other than boxes or crates. Articles shipped in boxes or crates will generally not present unusual or significant handling considerations. However, when tendered in packages that provide minimal exterior protection, care must be taken when handling the freight so as to avoid damaging the products.

**Stowability**—When the involved saws are tendered in boxes or crates, a flat load-bearing surface will generally be present, which would allow for other freight to be loaded on top of the handling unit. There will typically be lateral support for adjacent freight as well. When the articles are tendered in packages other than boxes or crates, they may not provide a regular load-bearing surface for top freight or lateral support for adjacent freight. Furthermore, when loading the handling unit inside the vehicle, the lack of protective packaging may limit the type of freight that may be stowed safely on top of or adjacent to the involved articles. This can result in increased time and effort on the part of the carrier to properly structure the vehicle load so as to mitigate the chance of damage to the products or to other freight with which stowed.

**Liability**—As is the case with most general commodities, when tendered for shipment fully enclosed within boxes or crates, the involved products should not be unusually susceptible to damage nor likely to damage other freight. However, when tendered in packages other than boxes or crates, which may offer little or no protection, these products exhibit a greater susceptibility to damage and a greater propensity to damage other freight.

**Conclusion**

Based on the foregoing analysis, this proposal would cancel item 133250 and establish a new item, naming “Saws, power operated, portable, NOI, including Portable Sawmill Machines or Chainsaws.” This would foster clarification and address interpretation issues. The new item would assign classes predicated on packaging and density, with breaks at 8 and 12 pcf<sup>2</sup>. The table on the following page relates the information of record to the proposed density groupings and FCDC guidelines for the proposed classes when the articles are tendered in boxes or crates, and a one-class adjustment from the density guidelines when the articles are tendered in packages other than boxes or crates to reflect the identified negative handling, stowability and liability characteristics.

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

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Density Group (pcf)	Average Density (pcf)	FCDC Minimum Average Density Guideline (pcf)	Class Based on FCDC Density Guidelines	Class Adjustment Based on Handling, Stowability and Liability Considerations
Less than 8	5.39	5	175	200
8 but less than 12	9.69	9	100	110
12 or greater	19.98	15	70	77.5