SUBJECT 34

Re: Fenders, boat-carrying trailer, utility trailer, or snow or ice vehicle

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Proponent: Freight Classification Development Council

Present Classification Provisions

Item	Description	Class
	VEHICLE PARTS: subject to item 190500	
191710	**Fenders,** boat carrying trailer, or snow or ice vehicle, steel, 18 gauge or thicker, nested, primed or not primed, not finish painted, in packages	70

Proposed Classification Provisions

Item	Description	Class
	VEHICLE PARTS: subject to item 190500	
⇉191710	**Fenders,** boat-carrying or utility trailer, or snow or ice vehicle:	
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	200
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	250
Sub 7	8 but less than 12	110
Sub 8	12 or greater	77.5

Analysis

Introduction

This proposal is based on information developed through Research Project 1489, which was initiated to review the transportation characteristics of fenders for boat-carrying trailers, utility trailers, or snow or ice vehicles. The project was initiated in light of interpretation questions regarding the classification of fenders for utility trailers.

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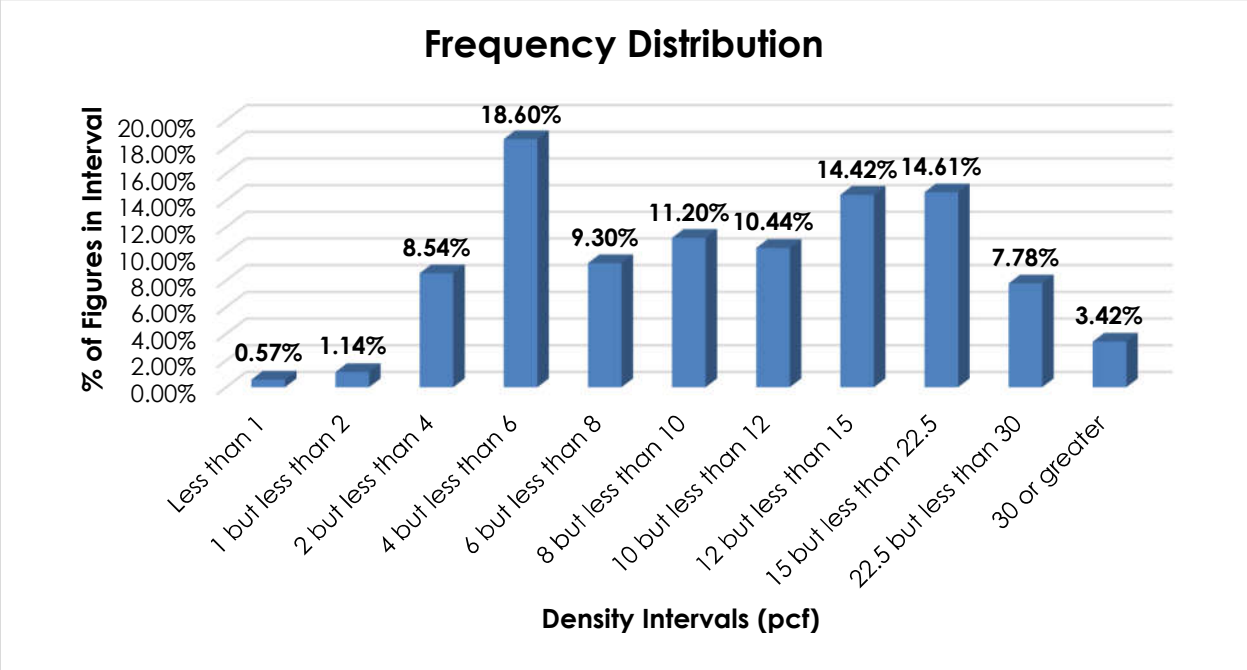
Transportation Characteristics

Density—The information of record includes 527 density observations obtained from the FCDC's Density Study[1]. The densities range from 0.74 to 43.33 pcf, with an overall average density of 11.71 pcf. As shown in the graph below, the densities are distributed throughout the range with a distinct peak in the 4 but less than 6 pcf interval and clustered peaks between 12 and 22.5 pcf. Density breaks at 8 and 12 pcf reflect the modality and spread of the distribution.



When the data is evaluated on the basis of the three proposed density groupings to reflect the distribution of densities, the ranges and averages in the table below emerge.

Density Group (pcf)	Density Range (pcf)	Average Density (pcf)
Less than 8	0.74 – 7.99	4.80
8 but less than 12	8.00 – 11.95	10.00
12 or greater	12.00 – 43.33	19.18

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, additional care must be taken when handling the freight so as to avoid damaging the products.

[1] 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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Stowability—When the involved fenders 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 fenders. 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.

Liability—As is the case with most general commodities, when tendered for shipment fully enclosed within boxes or crates, the involved fenders should not be unusually susceptible to damage. However, when tendered in packages other than boxes or crates, which may offer little or no protection, these products exhibit greater susceptibility to damage.

Conclusion

Based on the foregoing analysis, and to address interpretation issues, this proposal would amend item 191710 to read, "Fenders, boat-carrying or utility trailer, or snow or ice vehicle," and assign classes predicated on packaging and density, with breaks at 8 and 12 pcf[2]. The table below relates the information of record to the proposed density groupings and FCDC guidelines for the proposed classes when 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.

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	4.80	4	200	250
8 but less than 12	10.00	9	100	110
12 or greater	19.18	15	70	77.5

[2] The density provisions would include reference to Item (Rule) 170, the inadvertence clause.

