

SUBJECT 37

Re: Miscellaneous Packaging Provisions

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Proponent: Freight Classification Development Council

Present Classification Provisions

Item	Description	Class
57157	Devices , terminal control, forced air distribution, see Note, item 57158, in boxes or crates or on skids, 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
57158	NOTE—Not Involved.	

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SUBJECT 37

Present Classification Provisions — Continued

Item	Description	Class
	MACHINERY GROUP: subject to item 114000	
125850	Mufflers, Exhaust Systems, Automobile Pipe, Surge Suppressors and related articles, viz.: Automobile Pipe or Tubing , steel, copper plate or terne plate, straight or bent, further processed than cut to length, see Note, item 125853; Exhaust Systems , internal combustion engine, see Note, item 125851; Hydraulic Accumulators ; Industrial Noise, Pulsation or Surge Suppressors or Silencers , see Note, item 125852; Mufflers, Resonators, Spark Arresters or Silencers , internal combustion engine; On skids 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
125851	NOTE—Not Involved.	
125852	NOTE—Not Involved.	
125853	NOTE—Not Involved.	

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SUBJECT 37

Present Classification Provisions — Concluded

Item	Description	Class
	WASHERS; GASKETS; OR PACKING DEVICES, FORMS OR SHAPES, OTHER THAN PACKAGING: subject to item 194000	
194120	Washers; Gaskets; or Packing Devices, Forms or Shapes, other than packaging; NOI, in bags, boxes or crates, or in wrapped rolls secured to wooden pallets, 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

Proposed Classification Provisions

Item	Description	Class
57157	Devices, terminal control, forced air distribution, see Note, item 57158, ⇌in boxes or crates, 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
57158	NOTE—No Change.	

SUBJECT 37

Proposed Classification Provisions — Continued

Item	Description	Class
	MACHINERY GROUP: subject to item 114000	
125850	Mufflers, Exhaust Systems, Automobile Pipe, Surge Suppressors and related articles, viz.: Automobile Pipe or Tubing , steel, copper plate or terne plate, straight or bent, further processed than cut to length, see Note, item 125853; Exhaust Systems , internal combustion engine, see Note, item 125851; Hydraulic Accumulators ; Industrial Noise, Pulsation or Surge Suppressors or Silencers , see Note, item 125852; Mufflers, Resonators, Spark Arresters or Silencers , internal combustion engine; ⇒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
125851	NOTE—No Change.	
125852	NOTE—No Change.	
125853	NOTE—No Change.	

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SUBJECT 37

Proposed Classification Provisions — Concluded

Item	Description	Class
	WASHERS; GASKETS; OR PACKING DEVICES, FORMS OR SHAPES, OTHER THAN PACKAGING: subject to item 194000	
194120	Washers; Gaskets; or Packing Devices, Forms or Shapes, other than packaging; NOI, in bags, boxes or crates, or in wrapped rolls secured on lift truck skids or pallets, 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

Analysis and Conclusion

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.

The minimum packaging requirements in item 57157 are “in boxes or crates or on skids,” and the minimum packaging requirements in item 125850 are “On skids or in packages.” Articles tendered on skids are not afforded the same level of protection as those tendered in boxes or crates or “in packages”¹. Therefore, as proposed, the reference to “on skids” would be removed from items 57157 and 125850.

The minimum packaging requirements in item 194120 are “in bags, boxes or crates, or in wrapped rolls secured to wooden pallets.” For clarification and uniformity, and to allow for lift truck skids or pallets of equal or greater strength than wooden pallets, the requirements for articles tendered in wrapped rolls would be amended to read, “in wrapped rolls secured on lift truck skids or pallets.”

¹ Item (Rule) 680, Sec. 5(a) defines the term 'in packages' as, "...in any container or in any other form tendered to carrier which will permit handling into or out of vehicles as units, provided such containers or tendered forms will render the transportation of freight reasonably safe and practicable so that it will withstand the normal rigors of the less-than-truckload environment...but does not include articles...on skids'..."