

REVIEW MATTER FF

**Re:** Research Project 993 — Bodies, freight or passenger automobile

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**Present Classification Provisions:**

Item No.	Description	Class
	<b>AUTOMOBILE PARTS GROUP:</b> subject to item 17800	
18020	<b>Bodies,</b> bottlers' truck, deck type, iron, in boxes or crates:	
Sub 1	SU, see Note, item 18022:	
Sub 2	Height of package over 34 inches.....	150
Sub 3	Height of package not over 34 inches.....	110
Sub 4	Completely taken apart.....	92.5
18022	NOTE—Bodies, not lettered nor finished other than coated with asphalt paint or primed, or such bodies finished, with lettering protected by heavy paper and crating, may be shipped without being boxed or crated.	
18060	<b>Bodies,</b> freight, NOI, including <b>Dumping Bodies,</b> see Note, item 18061, or suburban (combination passenger and freight bodies):	
Sub 1	SU, height of packages, see Note, item 18062:	
Sub 2	Over 54 inches, in boxes or crates.....	250
Sub 3	Over 44 inches but not over 54 inches, in boxes or crates.....	200
Sub 4	Over 34 inches but not over 44 inches, in boxes or crates.....	150
Sub 5	Not over 34 inches, see Note, item 18064.....	110
Sub 6	KD flat, in boxes or crates, see Notes, items 18064, 18066 and 18068.....	100
18061	NOTE—Does not apply on steel tilting-type dumping boxes for mounting in conventional freight automobile bodies. For provisions applicable on these commodities, see item 18320.	
18062	NOTE—The height measurement of the package, or body if shipped loose, is to be taken with body in its natural upright position.	
18064	NOTE—Freight bodies, NOI, open top, not exceeding 34 inches in height, not lettered nor finished other than coated with asphalt paint or primed, or such bodies finished, with lettering protected by heavy paper and crating may be shipped without being boxed or crated.	
18066	NOTE—Shipments of freight bodies, NOI, KD flat, may be shipped as follows when loaded and protected by the shipper: body panels must be loaded in upright position against inside wall of trailer with strips of plywood between side of vehicle and panel and between each succeeding panel at intervals of not over 2 feet the entire length of panels and held in position by self-adhering type tape. Panels to be braced in a manner to prevent shifting.	
18068	NOTE—Will also apply when in metal-strapped bundles with wooden spacers between panels.	
18080	<b>Bodies,</b> freight, open top, without seat cabs:	
Sub 1	Box, rack or stake bodies, KD, with sides, ends and stakes detached.....	100
Sub 2	Platform, without ends, sides or stakes.....	85
18130	<b>Bodies,</b> plastic, NOI, with or without fenders, tops or other parts, in crates:	
Sub 1	SU, not nested.....	400
Sub 2	KD or nested.....	300

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**Present Classification Provisions: (Concluded)**

Item No.	Description	Class
	<b>AUTOMOBILE PARTS GROUP:</b> subject to item 17800	
18133	<b>Bodies</b> , plastic, with integral steel frame, SU, in crates, height of package not exceeding 42 inches .....	200
18160	<b>Bodies</b> , passenger, NOI:	
Sub 1	Other than KD flat, in boxes or crates, height of package, see Note, item 18062:	
Sub 2	Over 54 inches .....	250
Sub 3	Over 44 inches but not over 54 inches.....	200
Sub 4	Over 34 inches but not over 44 inches.....	150
Sub 5	Not over 34 inches .....	100
Sub 6	KD flat, in packages.....	100
18180	<b>Bodies</b> , school bus, KD, in packages.....	125

**Analysis:**

Research Project 993 was initiated at the request of the National Motor Carrier Weighing and Research Association in October 2004 in response to reported interpretation difficulties in distinguishing the precedence of the provisions for plastic automobile bodies versus freight or passenger automobile bodies.

The provisions of items 18020, 18060, 18080, 18160 and 18180 were adopted from the rail classification in 1936. With the exception of a few minor changes, such as moving the provisions from the Vehicle Parts Group to the Automobile Parts Group, they have remained substantially unchanged. Given that these provisions were first published in 1936, it is logical that they were intended to apply on bodies made from materials other than plastic or plastic combined with other materials.

With the exception of the addition of the term “NOI,” the current provisions of item 18130 were established as a result of action taken on Docket 142, Subject 69 (September, 1969) and first appeared in Supplement 23 to NMF A-11, effective March 5, 1971. The provisions of item 18133 were established as a result of action taken on Docket 781, Subject 22 (January, 1978) and first appeared in Supplement 16 to NMF 100-E, effective March 17, 1979. The reference to “NOI” was also added to item 18130 at this time. Both of these items have remained substantially unchanged to the present.

A review of the NCC’s Motor Carrier Density Study and other file references has uncovered limited indications of movement of deck-type bottlers’ truck bodies as named in item 18020, open top freight bodies, without seat cabs as named in item 18080 and school bus bodies, KD, as named in item 18180. This information is extremely limited and may represent misdescribed shipments, particularly in light of today’s vehicle safety standards. An Internet search has also failed to uncover any information on these types of bodies other than historical articles detailing vehicle construction in the early 1900’s. This indicates that these provisions may be obsolete.

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Finally, item 18060 applies on freight bodies while item 18160 applies on passenger bodies. Both items have essentially the same subprovisions and provide almost identical classes, with the exception of the sub 5 provision of item 18060 which provides a class 110 for bodies not over 34 inches in height, while sub 5 of item 18160 provides a class 100 for bodies not over 34 inches in height. In light of the current similarities between freight and passenger bodies in today's automotive market, consolidating these provisions would clarify their application.

**Relationship to NCC Policies and Guidelines:**

NCC policy calls for the cancellation of provisions that may be obsolete in the interest of clarification and simplification. Information developed during Project 993 indicates that the provisions of item 18020, naming "Bodies, bottlers' truck, deck type, iron," item 18080, naming "Bodies, freight, open top, without seat cabs," and item 18180, naming "Bodies, school bus, KD," may be obsolete. An Internet search failed to uncover any current information on these products and the information in the NCC's files and Motor Carrier Density Study is limited and may not be accurate. Canceling the provisions of items 18020, 18080 and 18180 as obsolete would be in keeping with NCC policy and precedent. Concurrently, the Note, item 18022, which is referenced in item 18020, could be cancelled with no further application.

NCC policy also calls for employing language that is concise and clear as to intent and for structuring item descriptions so as to foster clarification and simplification. A review of the NCC's files reveals that the provisions of items 18060 and 18160 were adopted from the rail classification in 1936. Given that these provisions predate the widespread use of plastics, especially for products such as automobile bodies, it is logical that they were intended to apply on bodies made from materials other than plastic. Restricting these provisions to "other than plastic" would be in keeping with their intent and also with NCC policy and precedent.

In addition, items 18060 and 18160 both provide identical subprovisions based on the height of the body with essentially the same classes. The only class difference involves freight bodies not over 34 inches in height as provided for in sub 5 of item 18060 which provides a class 110 while the identical provision in sub 5 of item 18160 for passenger bodies provides a class 100. Combining these provisions into a single item for "Bodies, freight or passenger," would be in keeping with NCC clarification and simplification policy. Concurrently, amending items 18130 and 18133, which apply on plastic bodies, to also include a reference to "freight or passenger" to complement the amendments to other than plastic bodies, would be consistent with NCC clarification policy and NCC precedent.

NCC packaging policy also calls for packaging requirements that provide adequate protection from the normal rigors of transportation. Presently, Note, item 18062 which is referenced in both item 18060 and 18160 provides a method for measuring the height of the body and includes a method for measuring these bodies when shipped loose. Given that neither item 18060 nor 18160 allow for the body to be shipped loose, this reference is obsolete and it would be in keeping with NCC policy to remove it.

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Additionally, Note, item 18064, which is referenced in subs 5 and 6 of item 18060, for freight bodies not over 34 inches in height or KD flat, as well as Notes, items 18066 and 18068, which are referenced in sub 6 for KD flat freight bodies, provide packaging exceptions or requirements that are less stringent than the requirements for other freight bodies named in item 18060. Presently, other bodies moving under item 18060 are required to be tendered in boxes or crates. Based on a review of these packaging exceptions or specifications by the NCC's Packaging Engineer, they would not provide adequate protection in today's LTL environment and their cancellation would be in keeping with NCC packaging policy.

In keeping with the directive of the National Motor Carrier Weighing and Research Association, the following page provides sample provisions for the Panel's consideration that are in keeping with NCC policy and precedent.

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**Possible Classification Provisions:**

Item No.	Description	Class
	<b>AUTOMOBILE PARTS GROUP:</b> subject to item 17800	
18020	<b>Bodies,</b> bottlers' truck, deck type, iron, etc .....	⇒Cancel; believed to be obsolete
18022	NOTE—⇒Cancel; no further application.	
18060	<b>Bodies,</b> freight ⇒or passenger, other than plastic, see Note, item 18061, in boxes or crates:	
Sub 1	SU, height of packages, see Note, item 18062:	
Sub 2	⇒Over 54 inches.....	No Change
Sub 3	⇒Over 44 inches but not over 54 inches .....	No Change
Sub 4	⇒Over 34 inches but not over 44 inches .....	No Change
Sub 5	⇒Not over 34 inches.....	⇒100
Sub 6	⇒KD flat.....	No Change
18061	NOTE—Does not apply on steel tilting-type dumping boxes for mounting in conventional freight automobile bodies. ⇒See item 18320 for applicable provisions.	
18062	NOTE—The height measurement of the package ⇒is to be taken with body in its natural upright position.	
18064	NOTE—⇒Cancel; no further application.	
18066	NOTE—⇒Cancel; no further application.	
18068	NOTE—⇒Cancel; no further application.	
18080	<b>Bodies,</b> freight, open top, without seat cabs, etc .....	⇒Cancel; believed to be obsolete
18130	<b>Bodies,</b> ⇒freight or passenger, plastic, NOI, with or without fenders, tops or other parts, in crates:	
Sub 1	SU, not nested .....	No Change
Sub 2	KD or nested .....	No Change
18133	<b>Bodies,</b> ⇒freight or passenger, plastic, with integral steel frame, SU, in crates, height of package not exceeding 42 inches, ⇒see Note, item 18062.....	No Change
18160	<b>Bodies,</b> passenger, NOI, etc.....	⇒Cancel; see item 18060
18180	<b>Bodies,</b> school bus, KD, etc.....	⇒Cancel; believed to be obsolete