

SUBJECT 2

Re: Paper or Letter File Fasteners, Clips, Clasps or Holders

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Proponent: Carrier members present at the Classification Panel meeting on May 2, 2006

Present Classification Provisions:

Item No.	Description	Class
	STATIONERY GROUP: subject to item 178850	
179000	Fasteners, Clips, Clasps or Holders, paper or letter file, metal, in boxes	70
179005	Fasteners or Clips, paper or letter file, plastic, in boxes.....	77.5
179180 ¹	Stationery, viz.:	
	Pens, ink, NOI;	
	Stationery, NOI;	
	Stationery Sets, see Note, item 179182;	
	In boxes, subject to Items 170 and 171 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.....	150
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
179182	NOTE—Not Involved.	

¹ Provisions reflect changes made as a result of action on Docket 2006-2, Subject 13, which are scheduled to be published in Supplement 4 to NMF 100-AF, with an effective date of July 22, 2006.

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Proposed Classification Provisions:

Item No.	Description	Class
	STATIONERY GROUP: subject to item 178850	
179000	Fasteners, Clips, Clasps or Holders, paper or letter file, metal, etc	⇒Cancel; see item 179180
179005	Fasteners or Clips, paper or letter file, plastic, etc.....	⇒Cancel; see item 179180
179180	Stationery, viz.: ⇒ Fasteners, Clips, Clasps or Holders, paper or letter file; Pens, ink, NOI; Stationery, NOI; Stationery Sets, see Note, item 179182; In boxes, subject to Items 170 and 171 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.....	150
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
179182	NOTE—No Change.	

Analysis:

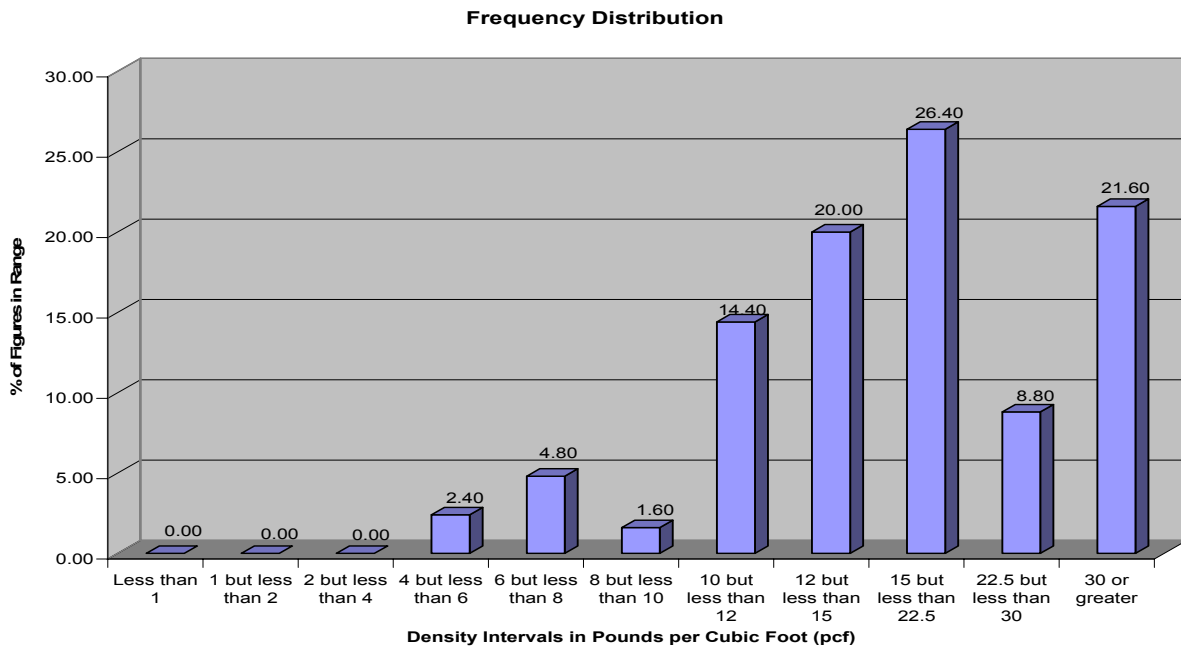
This proposal is based on Research Project 1011, which was initiated by the Panel that met in May, 2005 following their consideration of a report indicating potential low densities associated with plastic paper clips.

The provisions of item 179000 applying on metal paper clips were adopted from the rail classification in 1936. The provisions of item 179005 applying on plastic paper clips were established as a result of action taken on Docket 124, Subject 81 (July 1966), and first appeared in Supplement 11 to NMF A-9, effective July 20, 1967. This proposal also added the reference to “metal” in item 179000. Information from the record showed that plastic paper clips had an average density of 14.16 pcf and values ranging from 70 to 78 cents per pound (in 1967 dollars).

During the course of Project 1011, the staff contacted 3 trade associations and 23 potential shippers of paper clips in June and again in October of 2005. No response was received from the associations. Of the shippers that were contacted, 3 surveys were returned as undeliverable and 5 companies indicated that they did not ship paper clips. No usable information was developed. Information was obtained, however, from the NCC’s Density Study.

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Density – Metal clips moving under the provisions of item 179000 have been found to range in density from 4.20 to 119.29 pcf, with a simple average density of 22.37 pcf and a median density of 15.96 pcf. Plastic clips moving under item 179005 range in density from 5.12 to 11.14 pcf, with a simple average density of 7.68 pcf and a median density of 7.23 pcf. Overall, these products range in density from 4.20 to 119.29 pcf, with a simple average of 21.91 pcf. The overall median density is 15.66 pcf. The following chart depicts the distribution of the known density figures:



Handling, Stowability and Liability – There is no indication of any unusual handling, stowing or liability considerations.

Relationship to NCC Policies and Guidelines:

This proposal would cancel the provisions of items 179000 and 179005 and incorporate them into the density-based provisions of item 179180. Concurrently, item 179180 would be amended to include a reference to “Fasteners, Clips, Clasps or Holders, paper or letter file.” The information of record reveals a wide range in density, from 4.20 to 119.29 pcf and no unusual handling, stowing or liability considerations. Based on the information of record, this proposal is in keeping with NCC policy and precedent where a product exhibits a wide range in density and no unusual handling, stowing or liability considerations.