

SUBJECT 3

Re: Tables, NOI

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Proponent: Commodity Classification Standards Board

Present Classification Provisions

Item	Description	Class
	FURNITURE GROUP: subject to item 79000	
	Metallic or Wooden , subject to item 79600	
79022	NOTE—Not Involved.	
80582 ¹	NOTE—Articles tendered in Package 25F must have all finished surfaces covered to sufficiently protect from abrasion. Articles must also be secured within the package so as to prevent shifting and direct contact with the shipping container.	
81742	NOTE—Applies only when wire or rod does not exceed 3/16 inch in thickness.	
82100	Tables , NOI, see Note, item 82138:	
82105 ²	Aluminum or aluminum and steel or wood combined:	
Sub 1	SU, in Packages 1F, 25F, or crates.....	200
Sub 2	KD, in Packages 19F or 25F.....	100
Sub 3	KD flat, in Packages 19F, 25F, or crates	85
82110 ²	Steel, see Notes, items 82132 and 82134:	
Sub 1	Wire or rod, see Note, item 81742:	
Sub 2	SU, in Packages 1F, 3F or 5F	300
Sub 3	KD, in Packages 1F, 3F, 5F or 19F.....	85
Sub 4	NOI:	
Sub 5	SU, in Packages 9F or 3003S	150
Sub 6	SU, in boxes, crates or doublewall corrugated fibreboard containers, see Note, item 82111	125
Sub 7	KD, in crates or Packages 9F or 25F.....	85
Sub 8	Cast iron, KD flat, in boxes.....	70
82111	NOTE—Packages must comply with the marking requirements specified in Note, item 79022(c).	
82120	Steel and wood combined, see Notes, items 82132 and 82134:	
Sub 1	SU, in Packages 1F, 2F, 3F, 5F, 21F, 22F or 34F	125
Sub 2	KD, in Packages 1F, 3F, 5F, 19F, 109F or 3010S	85
82130 ²	Wooden, see Notes, items 82132 and 82136:	
Sub 1	SU, in Packages 1F, 3F, 5F, 21F, 22F, 34F, 85F, 132F, 133F, 146F, 152F, 2354 or 3003S.....	150
Sub 2	KD, finished, in Packages 1F, 3F, 5F, 19F, 21F, 22F, 38F, 138F, 140F, 141F or 3010S	85
Sub 3	KD, not finished, in Package 9F	85

¹ As published in Supplement 1 to NMF 100-AH, effective April 26, 2008.

² As published in Supplement 2 to NMF 100-AH, effective August 23, 2008

SUBJECT 3

Present Classification Provisions — Concluded

Item	Description	Class
82132	NOTE—There may be included one lawn umbrella for each table.	
82134	NOTE—Iron or steel pedestal bases of tables may be shipped in packages.	
82136	NOTE—Table leaves may be packed in Package 19F.	
82138	NOTE—Also applies on tables with composition, glass, stone or tile tops attached or detached and in same package, or on accompanying tops made of glass, tile or composition other than cast stone, in separate packages. When separately packaged, tops made of cast or natural stone will be classified as Stone Blocks, Pieces or Slabs, item 90500, and may be shipped in Package 94F. Glass tops may be shipped in separate packages authorized for Flat Glass, not bent, item 86730.	

Proposed Classification Provisions

Item	Description	Class
	FURNITURE GROUP: subject to item 79000	
	Metallic or Wooden, subject to item 79600	
79022	NOTE—No Change.	
80582	NOTE—No Change.	
81742	NOTE—No Change.	
⇒82100	Tables, NOI, with or without tops of other materials, see Notes, items A-NEW and B-NEW, in Packages 2354, 1F, 2F, 3F, 5F, 19F, 21F, 22F, 25F, 34F, 38F, 85F, 109F, 132F, 133F, 138F, 140F, 141F, 146F or 152F, see Notes, items 80582 and C-NEW, 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
82105	Aluminum or aluminum and steel or wood combined, etc...⇒Cancel; see item 82100	
82110	Steel, etc	⇒Cancel; see item 82100
82111	NOTE—⇒Cancel; no further application.	
82120	Steel and wood combined, etc	⇒Cancel; see item 82100

SUBJECT 3

Proposed Classification Provisions — Concluded

Item	Description	Class
	FURNITURE GROUP: subject to item 79000	
	Metallic or Wooden, subject to item 79600	
82130	Wooden, etc	⇒Cancel; see item 82100
⇒A-NEW	NOTE—Applies on tables with tops attached, or detached in same or separate package.	
⇒B-NEW	NOTE—There may be included one lawn umbrella for each table.	
⇒C-NEW	NOTE—The following departures from packing requirements are permitted:	
	1. Steel tables, other than wire or rod; or unfinished wooden tables, KD; may be shipped in Package 9F.	
	2. Steel and wood combined tables, KD, or finished wooden tables, KD, may be shipped in Package 3010S.	
	3. Steel tables, SU, other than wire or rod, or wooden tables, SU, may be shipped in Package 3003S.	
	4. When separately packaged, tops made of cast or natural stone may be shipped in Package 94F.	
	5. Glass tops may be shipped in separate packages authorized for Flat Glass, not bent, item 86730.	
82132	NOTE—⇒Cancel; see item B-NEW.	
82134	NOTE—⇒Cancel; no further application.	
82136	NOTE—⇒Cancel; no further application.	
82138	NOTE—⇒Cancel; see item C-NEW.	

Analysis

This proposal is based on Research Project 784, which was initiated by a former Classification Panel in October, 1997 following their consideration of a report on wooden outdoor or casual furniture. The Panel directed that the staff report their findings on a case-by-case basis. The most recent commodity evaluated under Research Project 784 involved the provisions for chairs. The provisions for chairs were considered in Docket 2006-2, Subject 15 (May, 2006), which was a proposal to establish full-scale, density-based classes in lieu of the then-existing provisions based on material construction and form of shipment. The proposal was approved as modified and the changes first appeared in Supplement 4 to NMF 100-AF, with an effective date of January 27, 2007.

This proposal involves the general provisions for tables, NOI, as named in items 82100, 82105, 82110, 82120 and 82130. It also represents the conclusion of Research Project 784, as other items will be evaluated as concerns are identified by the CCSB.

Docket 101, Subject 1 (November, 1961) was a comprehensive proposal that established a significant percentage of the current provisions for furniture, and tables in particular. For the majority of the provisions involved, the action taken on Docket 101, Subject 1 resulted in the establishment of classes predicated on the articles' material consist and form

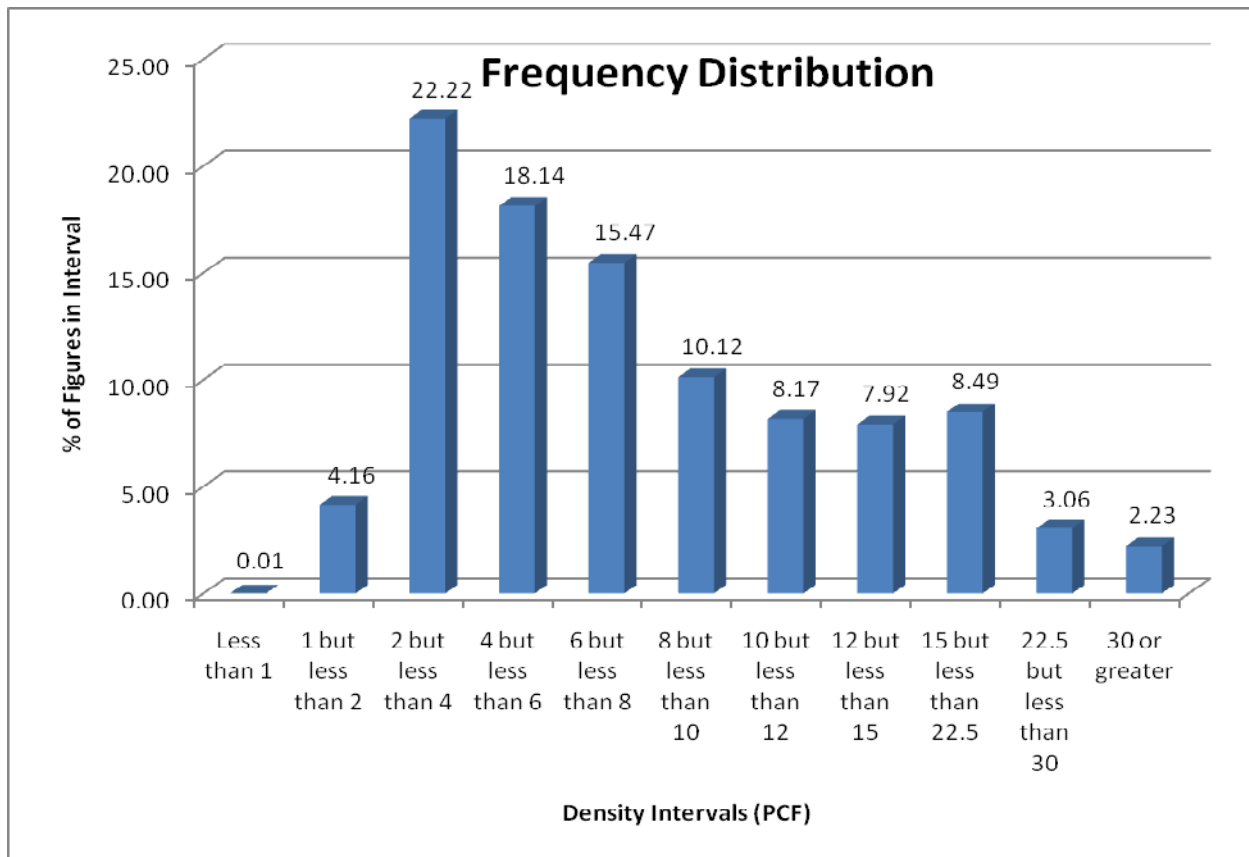
SUBJECT 3

of shipment, e.g., SU or KD. The changes first appeared in Supplement 8 to NMFC A-6, effective September 5, 1962.

As part of the research on tables, nine trade associations and 279 potential shippers were contacted in March and again in June of 2008 and invited to participate. From this sampling, one of the associations responded that they were not involved, while no response was received from the remaining eight associations. With respect to the 279 potential shippers, 38 surveys were returned as undeliverable and nine companies responded that they did not manufacture or ship tables. Information was received from five companies, however, not all of the information received was usable. Additional information was developed through CCSB dock surveys and the CCSB’s Density Study.

Transportation Characteristics

Density – Overall, the information of record indicates densities ranging from 0.20 to 103.22 pcf, with a simple average density of 8.77 pcf. The graph below depicts the distribution of the overall range in density and shows that the figures are distributed throughout the range with no clear breaks or gaps.



SUBJECT 3

The following table provides an analysis of the known density observations based on the *NMFC* item number and subprovision reported to be applicable. As can be seen, the density ranges for each of the currently applicable subprovisions overlap, with no clear distinction between each.

Item Number	Density Range (pcf)	Average Density (pcf)
82105-1	1.00 to 23.05	4.13
82105-2	1.10 to 38.67	6.68
82105-3	1.28 to 68.31	7.70
82110-2	1.31 to 6.49	4.18
82110-3	1.35 to 58.40	9.15
82110-5	1.01 to 30.28	5.26
82110-6	1.01 to 37.78	4.08
82110-7	2.01 to 64.45	8.97
82110-8	1.15 to 103.22	11.44
82120-1	1.07 to 28.21	6.17
82120-2	2.00 to 74.52	13.75
82130-1	1.00 to 31.65	6.27
82130-2	0.20 to 73.33	8.46
82130-3	2.09 to 33.00	8.37

Handling – In general, the current provisions for tables require them to be tendered for shipment in some type of fibreboard box or a crate. As with other articles of furniture, many of the packages are labeled “Fragile” and provide additional handling instructions such as arrows indicating a particular orientation for the package and the proper side from which to lift the package.

Stowability – Tables may require extra care and attention when stowing in motor carrier equipment to minimize the potential for damage. Many of the packages provide instructions to carrier personnel on the proper stowing techniques for that particular table, similar to those provided for handling. Also, the carrier’s ability to load freight on top of or around the table may be limited due to the amount of unsupported space inside the container and the container’s structural integrity, or lack thereof, to withstand outside pressure from adjacent freight.

Liability – Tables are not perishable, prone to spontaneous combustion or explosion, unusually susceptible to theft, nor likely to damage other freight. They are, however, susceptible to damage, particularly when tendered in non-complying packaging. Claims ratios were reported to range from 1.16% to 8.68%, with an average of 3.88%. Based on information submitted during the course of research, it is believed that many claims are the result of insufficient packaging. When tendered in a complying package, especially the designated F Packages which were developed specifically for articles of furniture, including tables, the potential for damage may be mitigated. A limited amount of information on the value of tables indicates a range from \$2.14 to \$45.86 per pound, with a simple average value of \$6.43 per pound.

SUBJECT 3**Relationship to CCSB Policies and Guidelines**

CCSB policy calls for classification provisions to reflect a commodity's known transportation characteristics. The table below relates the information of record to the CCSB's density guideline for the applicable class.

Item Number	Current Class	CCSB Density Guideline for Current Class (pcf)	Density Range (pcf)	Average Density (pcf)	Class Per CCSB Guidelines
82105-1	200	4	1.00 to 23.05	4.13	200
82105-2	100	9	1.10 to 38.67	6.68	150
82105-3	85	12	1.28 to 68.31	7.70	125
82110-2	300	2	1.31 to 6.49	4.18	200
82110-3	85	12	1.35 to 58.40	9.15	100
82110-5	150	6	1.01 to 30.28	5.26	175
82110-6	125	7	1.01 to 37.78	4.08	200
82110-7	85	12	2.01 to 64.45	8.97	110
82110-8	70	15	1.15 to 103.22	11.44	92.5
82120-1	125	7	1.07 to 28.21	6.17	150
82120-2	85	12	2.00 to 74.52	13.75	77.5
82130-1	150	6	1.00 to 31.65	6.27	150
82130-2	85	12	0.20 to 73.33	8.46	110
82130-3	85	12	2.09 to 33.00	8.37	110

CCSB policy further stipulates that commodities or commodity groups exhibiting a wide density range not accurately reflected by a single overall average density may be assigned density-based classes where there is no other feasible means of effectively narrowing the range. Additionally, where densities are distributed throughout the range, commodities or commodity groups may be assigned classes predicated on a full density scale. The involved tables exhibit a wide range in density, from 0.20 to 103.22 pcf, with a simple average density of 8.77 pcf. The frequency distribution shows that the density observations are distributed throughout the overall range with no clear gaps or breaks.

Based on the information of record, establishing classes predicated on the CCSB's alternative extended full density scale, as proposed, would address the wide range of densities identified for tables and be in keeping with CCSB policy and precedent. Such an approach would also be in keeping with CCSB policy regarding clarification and simplification by eliminating the existing four different items providing classes based on the material construction of the table and the manner in which it is tendered for shipment.