

BOHMAN INDUSTRIAL TRAFFIC CONSULTANTS, INC.
116 DEER MEADOW LANE
CHATHAM, MA 02633

Commodity Classification Standards Board
1001 North Fairfax St., Suite 600
Alexandria, VA 22314-1789

RE: Subject 3
CCSB Docket 2009-1

Dear Board Members:

I am writing you in behalf of our client, the Juvenile Products Manufacturers Association (JPMA) which has a number of members who manufacture juvenile tables, both wooden and metallic.

It appears your density survey of wooden and metallic tables found a wide range of densities that would warrant establishment of a multiple scale of ratings based on density.

Manufacturers of tables have built their business on the current, longstanding ratings in the NMFC. Those companies producing juvenile tables would be particularly hard hit should a density scale of ratings be published as they are lower priced products than most other types of tables. About the only way set up juvenile table manufacturers might have a chance of salvaging distant markets would be to reengineer their tables so they could be shipped with their legs removed. To do so would require a few months of work. It's not something that could be accomplished in just a few weeks as I'm sure you can appreciate.

To provide this needed extra time we would like to request, that if a multiple density scale is approved, it be published in the NMFC supplement covering changes approved at CCSB's June docket - DOCKET 2009-2.

Your favorable consideration of this reasonable request would be greatly appreciated.

Sincerely,

BOHMAN INDUSTRIAL TRAFFIC CONSULTANTS, INC.



Ray Bohman
President

in behalf of Juvenile Products Manufacturers Association

RB/sb

CC: Mike Dwyer, JPMA