

SUBJECT 16

Re: Full-Scale Density Classifications

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Proponent: Commodity Classification Standards Board

Proposed Classification Provisions

It is proposed to amend the items listed below to provide the density/class progression that follows:

2070	33800	53025 ¹	70050 ¹	101425 ¹	155850	181990 ¹
11080	35255 ¹	56040	70970 ¹	103300 ¹	156600 ¹	182130
13120 ₁	35350	56290	72040 ¹	108107	157242 ¹	183630
14560	35380	56790 ¹	72680 ¹	108520	157320	186620 ¹
15520 ¹	35850 ¹	56828	74800 ¹	109095 ¹	158260	186960
17870	39270 ¹	56960	74880	109700 ¹	158880 ¹	187120 ¹
18260 ¹	39515	57060	76580	109950	164390	187645
20000	39810	57157	79460	115985 ¹	168815	188560
20580 ¹	39920	57410	80440 ¹	116030 ¹	172670 ¹	188690
21840	40150 ¹	60535	80580 ¹	118150	174610 ¹	189800
22260	41006	61045 ¹	81740	124660 ¹	175120 ¹	190220
23340 ¹	41765	61700 ¹	82100 ¹	125850	175885	194120
24400	43525	62270	82270 ¹	132680	176050	195310
25328	49160 ¹	63160 ¹	82790	133950	177010	198080
26900 ¹	49237	63300	83270 ¹	149200	177320	199970 ¹
27200	49265 ¹	67900	84260 ¹	149240	177670	
27765	49390 ¹	67990	87700 ¹	149265	178090	
29285	49880	68090	88160 ¹	150390 ¹	178530	
29790 ¹	50000 ¹	68310 ¹	92800	152660 ¹	178690	
30160 ¹	51140 ¹	69100 ¹	95190 ¹	153900 ¹	179180 ¹	
33010 ¹	52900 ¹	69420	98390 ₂	154990	181920	

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

¹ These items already incorporate the 11-subprovision scale with density groups of 15 but less than 22.5 pcf at class 70, 22.5 but less than 30 pcf at class 65, and 30 pcf or greater at class 60, and would remain unchanged in this regard.

² This item assigns a unique 11-subprovision scale inconsistent with CCSB policy in several respects. This proposal would result in a number of changes to the item.

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Analysis

This subject proposes to amend the so-called full-scale density classifications in the NMFC to provide the density/class progression shown on page 1. The specific changes proposed are intended to address several issues, as discussed below.

The Nine-Subprovision Density Scale vs. the 11-Subprovision Density Scale

The CCSB's *Policies and Directives* call for full-scale density classifications to provide a standard 11-subprovision progression ranging from class 400 for densities of less than 1 pcf to class 60 for densities of 30 pcf or greater. Currently, however, more than half of the full-scale density classifications in the NMFC — as indicated on page 1 — still provide the once-standard nine-subprovision progression ranging from class 400 for densities of less than 1 pcf to class 70 for densities of 15 pcf or greater³.

Consequently, most of the full-scale density classifications in the NMFC are not in keeping with CCSB policy.

Item 98390

Item 98390, which names “Hats, Caps or Bonnets, NOI,” provides a unique full density scale. It is an 11-subprovision progression, but like the nine-subprovision scale it ranges from class 400 for densities of less than 1 pcf to class 70 for densities of 15 pcf or greater⁴:

Sub 1	Less than 1	400
Sub 2	1 but less than 2	300
Sub 3	2 but less than 3	250
Sub 4	3 but less than 4	200
Sub 5	4 but less than 5	175
Sub 6	5 but less than 6	150
Sub 7	6 but less than 8	125
Sub 8	8 but less than 10	100
Sub 9	10 but less than 12	92.5
Sub 10	12 but less than 15	85
Sub 11	15 or greater.....	70

Item 98390 is, therefore, not in keeping with CCSB policy.

³ Prior to February 8, 2000, the nine-subprovision progression was the standard full density scale. From February 8, 2000 until August 7, 2014, the nine-subprovision scale was the standard except where a substantial percentage of the densities involved exceeded 20 pcf, in which case the 11-subprovision scale was the standard. Since August 7, 2014, the 11-subprovision scale has been the lone standard.

⁴ The density scale in item 98390 is the result of action taken on Subject 36 of Docket 761 (January 1976). The provisions first appeared in Supplement 7 to NMF 100-C, effective August 16, 1976, and they have remained substantially unchanged to the present.

SUBJECT 16**The 4 but less than 6 pcf Density Interval**

For some time, NMFC users have observed and commented that the 4 but less than 6 pcf density interval, which assigns class 150, is not consistent with CCSB guidelines. The guidelines for class 150 call for a minimum average density of 6 pcf. Articles falling within the 4 but less than 6 pcf interval can achieve a 4 pcf or 5 pcf average, but they cannot achieve an average density of 6 pcf.

Relationship to CCSB Policies and Guidelines

Under this proposal, the so-called full-scale density classifications listed on page 1 that do not assign the CCSB's standard 11-subprovision progression would be amended to provide that standard scale, which ranges from class 400 for densities of less than 1 pcf to class 60 for densities of 30 pcf or greater⁵.

At the same time, the class assigned to the 4 but less than 6 pcf density interval in the items listed on page 1 would be adjusted from 150 to 175. As discussed in this analysis, CCSB guidelines for class 150 call for a minimum average density of 6 pcf. Articles falling within the 4 but less than 6 pcf interval cannot achieve an average density of 6 pcf, whereas they can achieve an average density of 4 pcf or 5 pcf. Under CCSB guidelines, an average density of 4 pcf is associated with class 200, and an average density of 5 pcf is associated with class 175. This proposal would assign class 175. The CCSB's *Policies and Directives* would be amended accordingly.

⁵ The CCSB's standard 11-subprovision density scale includes reference to Item (Rule) 170, the inadvertence clause, and Item (Rule) 171, the "bumping" privilege.