

**BEFORE THE
SURFACE TRANSPORTATION BOARD**

STB EX PARTE NO. 656 (Sub.-No. 1)

**INVESTIGATION INTO PRACTICES OF
THE NATIONAL CLASSIFICATION COMMITTEE**

**COMMENTS OF
NATIONAL SMALL SHIPMENTS TRAFFIC CONFERENCE, INC.**

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I. INTRODUCTION

The National Small Shipments Traffic Conference, Inc. (“NASSTRAC”) files these comments, with a focus on the operations of the National Classification Committee (“NCC”), in supplementation of comments previously filed in the main proceeding, Ex Parte No. 656, Motor Carrier Bureaus – Periodic Review Proceeding, and in response to the Board’s Decision served October 13, 2005 instituting this investigation.

NASSTRAC has addressed in prior comments the role played by NCC freight classification decisions in motor carrier ratemaking, and the strong public policy disfavoring antitrust immunity.¹ We continue to believe that the public interest would be best served by termination of NCC’s antitrust immunity. If the Board is not yet prepared to take that step, further reforms are needed to minimize the risk of anticompetitive conduct in NCC freight classification activities.

II. THE STATUS QUO IS UNTENABLE

The NCC would have the Board believe that no changes in current procedures are needed, and that no changes are possible without severe adverse impacts. Neither contention is true. On the contrary, the status quo is infected with anticompetitive bias in a number of major ways, and elimination of NCC antitrust immunity would be beneficial.

A. Bias in the Initiation of Proceedings

The current system is biased in favor of increases in commodity class ratings due to the way classification matters are initiated. A simple letter or email from a carrier member of the National Motor Freight Traffic Association, Inc. (“NMFTA”), NCC’s

¹ See American Society of Mechanical Engineers, Inc. v. Hydrolevel Corp., 456 U.S. 556 (1982), National Society of Professional Engineers v. United States, 435 U.S. 679 (1975), and other decisions cited at page 4 of NASSTRAC’s April 21, 2005 Rebuttal Comments in Ex Parte No. 656.

parent organization, is apparently enough to initiate a proceeding. Carriers have no incentive to request initiation of a proceeding that would lead to a reduced commodity class rating, and thereby lead to lower class rates and lower discount rates. Because most proceedings are initiated by carriers, proceedings in which changed freight classifications are sought are more likely to involve proposed increases in class ratings than proposed decreases.

Moreover, there is nothing in NCC procedures to prevent the same issue from being raised repeatedly before the NCC by the same carrier or by different carriers, in hopes of a higher rating and higher rates. NMFC member carriers pay nothing for NCC actions they request.²

While shippers have the right under NCC procedures to initiate proceedings of their own, and sometimes do so, most shippers are unaware of NCC activities. Such shippers are most vulnerable to “stealth” rate increases when the class ratings of their freight are increased. Even where they follow NCC dockets or are advised of relevant NCC proceedings, most shippers prefer not to initiate proceedings; they get involved in proceedings reluctantly and in a defensive posture, hoping to head off or mitigate an increased class rating suggested by a carrier and described as consistent with NCC policies by the NCC Staff.

Shippers seeking changes in commodity class ratings must provide extensive justification, and may be charged on a “direct-cost reimbursement basis” for assistance from the NCC Staff in conducting research on classification matters. Shipper resistance to carrier-initiated proposals is also burdensome and costly, as detailed below.

² Carrier members pay dues to NMFTA, but NCC activities are also supported by sales of the National Motor Freight Classification (“NMFC”).

B. Structural Bias in the Processing of Proceedings

Once a proceeding has been initiated, the NCC Staff seeks extensive information from shippers to determine whether a changed commodity class rating is warranted. In prior comments, NCC attacked, but did not deny, NASSTRAC's statement that information is routinely sought which is not necessarily relevant to the inquiry initiated by a carrier member. Nor did NCC rebut NASSTRAC's statement that providing the requested information may impose severe burdens on shippers.

In prior comments, NASSTRAC used the hypothetical example of a proceeding prompted by a carrier claim to the effect that the shipment density of 10" Revere frying pans warranted a higher class rating. A narrow inquiry into the density of a single commodity shipped by a single manufacturer should be sufficient to address this claim. However, NCC did not deny that its Staff would in fact seek data as to all transportation characteristics of all pans (and possibly all cookware) made by all manufacturers, forcing numerous manufacturers to gather and present extensive data.

Since those prior comments were filed, a non-hypothetical example of this problem has surfaced. In 2004, an unidentified member carrier brought to NCC's attention the fact that the NMFC Item covering ceiling fans describes the commodity as "Fans, electric, ceiling, without lighting fixtures." NMFC Item 61870, emphasis added. The carrier commented that many ceiling fans sold today that incorporate lighting fixtures do not fit within Item 61870, because of its narrow definition. Accordingly, shipments of ceiling fans with lighting fixtures may be subject to two separate NMFC Items, 61870 for ceiling fans and 109700 for lighting fixtures. The NCC observed that "the entire package must move according to Item (Rule) 422, classification of combined

articles” and “Item (Rule) 422 states that combined articles move at the class of the highest classed article in the combination.”³

There is obviously a simple solution to the problem raised by the carrier. NCC could simply propose to amend NMFC Item 61870 to cover ceiling fans with or without lighting fixtures. Such a change would have been supported by the nation’s leading ceiling fan manufacturers.

This was not NCC’s approach. Instead, the Staff evidently contacted the American Lighting Association, the National Electrical Manufacturers Association, and 43 ceiling fan manufacturers with requests for information about all the transportation characteristics of ceiling fans – density, stowability, handling and liability. Moreover, based on data received from a handful of manufacturers, the NCC tentatively determined that a 25% higher class rating on fans in one of the two categories in Item 61870 – ceiling fans with densities of less than 15 pounds per cubic foot – would be consistent with NCC policies.

Ceiling fan manufacturers, in an effort to avoid an increased class rating and higher rates on such fans, gathered extensive density information, which is included in redacted form in the attached write-up. Based on that data, the NCC Staff abandoned its support for a 25% increase, but fan manufacturers were required to gather and submit additional data after it was learned that the NCC Staff saw a 10% increase in class ratings for under 15 pound per cubic foot fans as consistent with NCC policies. It also emerged that much of the density data first submitted for several hundred thousand fan shipments

³ Attached hereto as an Appendix is a copy the NCC Staff write-up for this matter, as prepared for NCC Docket No. 2005-4, the November 2005 meeting. These same materials appear on the NMFTA/NCC website at www.nmfta.org/portals/1/docket%20files/2005_4_RMC.pdf. See Appendix at page 2.

was ignored by NCC because shipment length, width, height and weight data had not been included.

Though neither NASSTRAC nor NASSTRAC's counsel was involved in the NCC's separate lamps and lighting fixtures proceeding mentioned in the Board's October 13, 2005 Decision in this Docket, it appears likely that the data of the American Lighting Association members was ignored by the NCC on that occasion for similar reasons.

Clearly, the burdens imposed on ceiling fan manufacturers and their trade association have been considerable, while the burdens on carriers have been minimal because the NCC Staff was able to and analyze information for the carriers.

This matter has not yet been concluded, and the ceiling fan issue will be addressed again at NCC's February 2006 meeting. However, the burdens imposed on fan shippers would have been unnecessary if the NCC had simply proposed to amend the definition of ceiling fans to include fans with or without lighting fixtures. Unfortunately, footnote 2 on page 2 of the Attachment to these Comments indicates that a full-blown inquiry into all transportation characteristics of the commodity in question is virtually automatic anytime a member carrier requests NCC action.

According to its previously filed comments, NCC has a Staff of at least 18. At least 6 members of the NCC Staff are classification specialists, working full time on NMFC issues. Shipper organizations like NASSTRAC and the American Lighting Association are smaller and have no in-house freight classification expertise. Outside counsel and/or experts are needed to gather, analyze and present data from members and other shippers, many of which have reduced their logistics staffs since deregulation of trucking.

Where, as here, proceedings are processed in ways that put shippers at a disadvantage, because unnecessary information is sought and because shipper burdens and expenses far outweigh carrier burdens and costs, the freight classification system needs to be changed.

C. Structural Bias in the Applicable Standards

Shippers also regard the standards employed by the NCC as biased in favor of carriers. One example – “NMFC Item (Rule) 422” – was mentioned in the preceding section of these comments. This Rule provides:

When not specifically classified nor embraced in an NOI [not otherwise identified, or not more specifically described in the NMFC] item, articles which have been combined or attached to each other will be charged at the class for the highest classed article of the combination. This rule will not apply in connection with classes in exceptions to the Classification nor rates in commodity tariffs.

Under this rule, if a sporting goods manufacturer were to ship a pallet of bowling balls to a retailer, the shipment would move at a low Class 70 rating under NMFC Item 15930, due to its high density. However, if that same manufacturer were to add a box of ping pong balls to the pallet, Rule 422 would require the entire pallet to carry the highest possible rating – Class 500 – because that is the rating of ping pong balls under NMFC Item 15580. Although the actual density of the combined shipment would be virtually the same as the density of the pallet consisting solely of bowling balls, the shipment would be rated as if it consisted solely of ping pong balls, carrying a class rating, class rates and discount rates bearing no relationship to its actual density.

Obviously, if a combined shipment consists commodities of differing class ratings, rating the entire shipment as if it consisted solely of the highest rated commodity

will understate the actual density of the shipment, sometimes dramatically. There is an obvious bias in favor of carriers in such rules.⁴ NASSTRAC believes the proper way of rating mixed shipments is to use the actual density of the shipment, not an artificially low density.

NASSTRAC has previously criticized the NCC's Density Guidelines because they are non-linear, rapidly increasing class ratings as commodities drop below the average density of Class 100 commodities, but only slowly reducing class ratings for commodities of higher densities.⁵ See the following table.

<u>Minimum Average Density (in pounds per cubic foot)</u>	<u>Class Rating</u>
12	85
10.5	92.5
9	100
8	110
7	125
6	150

Commodities that are three pounds per cubic foot less dense on average than Class 100 commodities carry a Class 150 rating, 50% higher than Class 100 commodities. Benchmark class rates on class 150 commodities are 50% higher than class rates on class 100 commodities. In contrast, commodities three pounds per cubic foot more dense than Class 100 commodities carry a Class 85 rating, only 15% lower than Class 100 commodities. As a result, class rates rise faster with increasing density than they fall with decreasing density. This is a "heads we win, tails you lose" arrangement for carriers.

⁴ There is a similar rule for "mixed," as opposed to "combined" shipments in NMFC Item 640, Section 3.(a).

⁵ See NASSTRAC's March 2, 2005 Opening Comments in Ex Parte No. 656, at pp. 15-17. See also the reference to this issue in the Board's October 19, 2005 Decision in this Docket at p. 2.

NCC has largely acknowledged these facts but has attempted to justify its non-linear scale by arguing that this is necessary to maintain “reasonable weight/revenue relationships.” See NCC’s April 1, 2005 Reply Comments in Ex Parte No. 656, Reply Statement of William W. Pugh at 8-9.

This rationalization is inconsistent with NCC’s repeated claim that NCC classification actions are unrelated to ratemaking. Id., Pugh Reply Statement at 2-3. It also raises the fundamental question of the proper extent to which carrier revenue enhancement should result from collective carrier action with antitrust immunity, and the proper extent to which carrier revenue enhancement should be left to the free market.

NASSTRAC submits that so long as entities like NCC (and the rate bureaus) have antitrust immunity, they should employ neutral standards, not standards that favor their carrier members. Then, if additional revenues are needed by individual carriers, those carriers can seek higher revenues openly, through individual rate increases and bilateral negotiations with their shipper customers.

D. Structural Bias as to Personnel

The NCC’s members are carriers, which have the right to create, continue and change the procedures and standards applicable to freight classification. NCC actions are subject to corrective action only on a case-by-case basis through arbitration or through litigation before the STB, or to more fundamental corrective action in these periodic STB review proceedings.

Moreover, the NCC Staff, while well-versed in freight classification issues and generally helpful to the shippers attempting to participate in NCC proceedings, are

employed by the trucking industry through NMFTA and the NCC, and are answerable to NMFTA's 1200 motor carrier members.

In previous comments, NCC has expressed outrage at the suggestion that any NCC member or staffer might be affected by self-interest or trucking industry interest in higher commodity class ratings. At the same time, NCC consistently resists any greater voice for shippers on the ground that shippers cannot overcome their own self-interest. The NCC cannot have it both ways.

There are sure to be NCC members and NCC staffers and shippers who are scrupulous. However, the possibility of bias cannot be ruled out. Carriers, carrier employees and NCC staffers field inquiries, initiate proceedings, gather and interpret data, review shipper submissions, apply policies, docket items, make initial and appellate decisions and defend the results, acting as prosecutor, judge and jury as to issues in which the trucking industry has a clear financial interest. Protestations amounting to "trust us" cannot be accepted as consistent with the controlling public interest standard.

The reforms previously adopted by the STB – additional access to data and an arbitration option – are necessary but not sufficient. Case-by-case remedies requiring shippers and industries to mount expensive and burdensome campaigns in a forum where carriers have clear advantages do not address the systemic problem of bias in freight classification. Structural remedies are needed to deal with structural problems.

III. THE STATUS QUO IS UNNECESSARY

For the foregoing reasons, the status quo is not acceptable. It is also unnecessary. Therefore, the primary issue confronting the Board should not be whether the foregoing

examples of bias can be ameliorated, but whether the public interest supports continuation of antitrust immunity for the NCC.

In the next section of these Comments, NASSTRAC will discuss reforms which address shipper concerns and could help reduce the risk of anticompetitive conduct. However, the Board must also consider calls by NASSTRAC and others for more fundamental change.

Freight classification could be accomplished in a centralized fashion without structural bias as to the initiation of proceedings, the processing of proceedings, the application of standards or the personnel involved in decisionmaking. One way of achieving this result would be to “outsource” freight classification to an academic institution with expertise in transportation and logistics and with no incentive to influence outcomes one way or the other.

However, it should first be asked whether there is any need to continue centralized freight classification, whether by an outside group or by the NCC subject to additional reforms. NASSTRAC submits that there is not. A better solution would be to terminate NCC antitrust immunity. The risk of exposure to antitrust liability should provide a strong disincentive against anticompetitive conduct, as is the case in thousands of other industries across the United States. To the extent that NCC engages in benign or procompetitive activities, such as promulgating standards for reliable packaging, it could continue to operate without fear of legal challenge.

NCC is not the only standard-setting organization in the country, but it may be the only standard-setting organization that engages in what would, in all likelihood, be

characterized as price fixing absent antitrust immunity. To the extent that this is the case, NCC's activities are an anachronism, and should cease.

NCC has argued that it could not function without antitrust immunity, and that the end of the NCC would mean the end of motor carrier ratemaking as we know it. This is nonsense. If the NCC were to end its freight classification activities, the NMFC would still exist, and could still be used in conjunction with rate bureau class rates to establish baseline rates for the purpose of discounting.⁶

For most carriers and for shippers of most commodities, an end to NCC freight classification activities would have little or no short-term impact. The NCC meets four times a year, and considers only 15-20 commodities or issues per meeting, so most commodity class ratings would continue as is.

Longer term, there could be occasional new products, such as plasma televisions, whose class rating was unclear. Shippers of such products and their carrier partners would simply negotiate ratings and/or freight rates for such new products. People in business do this every day, and any related minor inconvenience is a small price to pay. On the plus side, the free market would replace a carrier-controlled body with little oversight and broad power to affect freight rates through gradual but persistent increases in commodity class ratings in ways that are neither fair nor transparent.

⁶ See, in this regard, the Board's decision served December 18, 1998 in Section 5a Application No. 118 (Sub-No. 1), EC-MAC Motor Carriers Service Association, Inc., et al.:

Indeed, if all that carriers needed were a baseline to which they can refer when making individual pricing decisions, they already have it: the class rate on any given commodity as of the date of this decision (or one week or one month or one year before this decision).

Slip opinion at 6. The same reasoning applies to the NMFC.

The principal result of an end to NCC classification activity would thus be that future changes in freight classification would be handled in the free market through negotiations between shippers and carriers. Not only is this not objectionable, but it is how the rest of the economy has worked for decades. There is no reason for today's deregulated trucking industry to operate any differently. See the Reply Comments of the US Department of Transportation filed April 1, 2005 in Ex Parte No. 656.

**IV. IF NCC ANTITRUST IMMUNITY
IS NOT TERMINATED, FURTHER
REFORMS ARE NECESSARY**

Termination of NCC antitrust immunity is both the best way of improving the status quo and the easiest. If, however, the Board is unwilling to take this step, it must consider multiple reforms designed to address the issues raised in this proceeding. Because this is a "Section 5a" proceeding, any reforms adopted by the STB may have to be incorporated by NCC into its agreement. NCC and its members retain the option of declining to adopt STB conditions and foregoing antitrust immunity.

At a minimum, the Board should call for neutral classification standards, including a linear density scale and termination of NMFC rules that artificially inflate the class rating of combined or mixed shipments above the ratings appropriate to their actual average transportation characteristics.

To address the problem of proceedings being initiated with little or no evidentiary basis, the Board should call for a prima facie case to be made for the need for a change before a proceeding is initiated and requests for data are sent to shippers by the NCC Staff. That is, any carrier seeking an increased commodity class rating should be required to provide supporting documentation of the kind shippers have routinely had to

produce. Moreover, shippers should have access to this data to confirm that the condition has been satisfied.⁷

The burdens on shippers and carriers would be reduced if the NCC did not automatically request information as to all transportation characteristics of all types of a commodity when only one transportation characteristic of a particular example of a commodity is at issue. Therefore, the NCC should be required to make its inquiries as narrow as possible rather than as broad as possible. This would increase the likelihood of participation by avoiding unnecessary burdens for participants.

To mitigate the complete control that trucking industry representatives have over commodity classification, the Board should reconsider voting rights for shippers, including shippers of affected commodities. To the best of NASSTRAC's knowledge, carriers of commodities under consideration are not required to recuse themselves from voting on whether or not to increase a commodity's class rating.

In addition, shipper participants in proceedings should have the fullest possible access to NCC Staff data consistent with confidentiality (which can be protected to a large degree through confidentiality agreements where outside counsel and experts are involved). In addition, the rules should clarify that NCC Staff analyses cannot give greater weight to their own less-specific data than to equally extensive or more extensive and more specific shipper-supplied data.

Finally, if NCC antitrust immunity is not terminated, the Board should consider creation of an advisory group made up of representatives of shippers and carriers which

⁷ NASSTRAC recognizes that the name of the carrier initiating a proceeding may need to be withheld, but shippers should be satisfied that, before they receive burdensome inquiries from the NCC Staff, the need for an investigation has been established.

could attempt to work out mutually agreeable improvements in NCC processes and standards, and report back to the Board.

V. CONCLUSION

The current system of motor carrier ratemaking based on discounting in the marketplace off benchmark class rates based on commodity class ratings, with class rates and class ratings established collectively by carriers operating with antitrust immunity, is a relic of a bygone era. To the extent that the current system has benefits, they will not disappear if NCC antitrust immunity ends, but those benefits can and will be compromised if the status quo is not changed.

For the foregoing reasons, and for reasons set forth in the comments of NASSTRAC and other shipper and governmental interests in Ex Parte No. 656, the antitrust immunity of NCC should be terminated, or, at a minimum, further conditioned to minimize the risk of marketplace distortions through anticompetitive carrier conduct. The Board should recognize that, for reasons set forth in NASSTRAC's Rebuttal Comments in Ex Parte No. 656 (at 1-3), the need to eliminate or minimize antitrust immunity, which has always been bedrock legal and economic policy in the US, is particularly great today with respect to the otherwise deregulated trucking industry.

Respectfully submitted,

/s/

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Dated: December 2, 2005

APPENDIX

REVIEW MATTER C**Re:** Research Project 969 —Ceiling Fans, with or without lighting fixtures**Staff Contact:** Lisa K. Winter

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Present Classification Provisions:

Item No.	Description	Class
	ELECTRICAL EQUIPMENT GROUP: subject to item 60500	
61870	Fans, electric, ceiling, without lighting fixtures, with blades in same or separate container or without blades, see Note, item 61872, in boxes, subject to Item 170 and having a density in pounds per cubic foot of:	
Sub 1	Less than 15	100
Sub 2	15 or greater	70
61872	NOTE—Not Involved.	
	LAMPS OR LIGHTING GROUP: subject to item 109000	
109700 ¹	Lamps or Lighting Fixtures, see Notes, items 109701, 109702, 109703 and 109704, viz.: Lighting Fixtures, NOI; [Other Articles Listed—Not Involved.] In boxes or crates, subject to Items 170 and 171 and having a density in pounds per cubic foot of, see Note, item 109706:	
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
109701	NOTE—Not Involved.	
109702	NOTE—Not Involved.	
109703	NOTE—Not Involved.	
109704	NOTE—Not Involved.	
109705	NOTE—Not Involved.	
109706	NOTE—Not Involved.	

¹ Ceiling fans with lighting fixtures are classified per Item (Rule) 422, which governs the Classification of Combined Articles.

REVIEW MATTER C**Analysis:*****Background of Project***

Research Project 969 on ceiling fans was initiated on February 27, 2004 at the direction of a member carrier. With the request, the carrier commented that most of the ceiling fans his company is transporting are shipped with lighting fixtures. As the current provisions for ceiling fans, per item 61870, do not allow for lighting fixtures, the lighting fixtures must be classified separately per item 109700, Lighting Fixtures, NOI, and the entire package must move according to Item (Rule) 422, classification of combined articles. Item (Rule) 422 states that combined articles move at the class of the highest classed article in the combination. The carrier indicated that, since today's ceiling fans often move with the lighting fixtures, his company finds this method of determining class to be cumbersome for the shipper as well as the carrier. The carrier further requested that when the project is completed, the staff present its findings to the next regularly scheduled Classification Panel with provisions consistent with NCC guidelines.²

A report on Research Project 969 was presented to the Panel that met on August 8, 2005. Mr. Donald Varshine representing the American Lighting Association was present for the discussion on this subject. He also provided the Panel with a statement of position and density data from nine ceiling fan manufacturers, which he claims represent "sixty plus percent" of the ceiling fan industry. In his comments, Mr. Varshine indicated that "ceiling fan manufacturers oppose any change in the class rating of below 15 pcf ceiling fans as unjustified. The NCC Panel is urged to docket a change that does not increase the class ratings in item 61870, but merely broadens the definition of fans in that item to include fans with or without lighting fixtures." The statement is shown in the attachment for this Panel's information.

In response to Mr. Varshine's comments and in light of the fact that he had provided a substantial number of density figures that the staff had not had time to analyze, the Panel directed the staff to combine the data provided by the ceiling fan industry with that already known, and report back with provisions consistent with NCC policies and guidelines at the Classification Panel meeting on November 8, 2005.

Scope of Project

On October 27, 2004 and again on January 7, 2005 the staff attempted to contact forty-three potential manufacturers of ceiling fans. The National Electrical Manufacturers Association and the American Lighting Association (ALA) were also contacted. The involved manufacturers, shippers or shipper groups were asked to provide information relative to the transportation characteristics of ceiling

²On page 2 of the attached ALA statement, Mr. Varshine states that: "Instead of simply recommending a broader definition of ceiling fans to encompass fans with or without lighting fixtures in item 61870, the NCC staff sought a broad range of information about the transportation characteristics of ceiling fans from ALA and others, including some of the leading ceiling fan manufacturers. This does not appear to have been requested by the carrier for which Review Matter G was initiated." By way of clarification, when the staff is directed to institute a research project, there are standard procedures that the staff follows, as directed by the NCC and pursuant to the NCC's Section 5A Agreement. This includes contacting trade associations and manufacturers or shippers of the involved product and requesting information relative to the transportation characteristics of that product. Further, the staff does not "recommend" provisions, rather, in its reports it shows provisions that are consistent with NCC policies and guidelines, but only when the party or parties requesting the research direct that such provisions be included in the staff's report.

REVIEW MATTER C

fans. Initial usable information was received on five manufacturers' products. As mentioned, at the Classification Panel meeting on August 8, 2005, Mr. Varshine provided additional information on nine manufacturers products. Seven of those companies provided raw data that could be combined with the data already received. Further data on 1273 shipments moving under the provisions of item 61870 was culled from the NCC's Density Study. In total, the staff has 1761 density observations on ceiling fans with or without lighting fixtures. The ceiling fan industry indicates that the information that it has provided alone represents over 60 percent of ceiling fans moving in commerce.

Background of Classification Provisions

The provisions for ceiling fans were established as a result of action taken on Docket 812, Subject 15 (March, 1981). This was a shipper proposal to establish specific provisions for ceiling fans. A class 92.5 was proposed for ceiling fans with densities of less than 17 pcf and a class 70 was proposed for ceiling fans with densities of 17 pcf or greater. Information in the docket file shows that ceiling fans with densities of less than 17 pcf had a density range from 5.23 to 13.67 pcf and an average density of 8.19 pcf. And ceiling fans with densities of 17 pcf or greater had a density range from 19.70 to 33.06 pcf and an average density 25.94 pcf. The proposal was approved as modified. (A density break at 15 pcf was adopted rather than the proposed 17 pcf and a class 100 was assigned to the lower-density fans, rather than the proposed 92.5.) Item 61870 was first published in Supplement 9 to NMF 100-H and became effective on October 10, 1981. The item has remained essentially unchanged to the present.

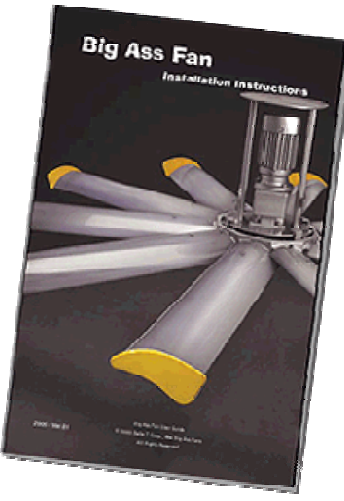
History of Ceiling Fans

Invented in 1882, the ceiling fan's early applications were solely commercial — in city meat markets for instance, to turn away airborne pests. But the fans' breeze-generating abilities soon made them staples in American homes. While their popularity waned in the 1950's with the invention of home air conditioning, during the 1970's energy crisis, sales increased considerably.

Twenty-four years ago, when item 61870 was established, most home ceiling fans were equipped with brass-finished motors and wood blades. Glass lighting fixtures were optional. Today's ceiling fans may be made with various materials including, but not limited to, metal, wood, canvas or plastic. Often the high-end home ceiling fan is shipped with the lighting fixture. Industry literature indicates that integrated lighting (as opposed to light kits that attach to the bottom of the motor) makes for sturdier construction and sleeker design. Many fans now feature glare-reducing uplighting as well as energy-efficient fluorescent or halogen bulbs. Also, while four blades used to be the standard; today most home ceiling fans have five. Blade spans are wider too — up to 60 inches — and where old fans had blades that sat parallel to the ceiling, now blades tilt at angles as great as 20 degrees, resulting in better movement of air.

Information was received in conjunction with Research Project 969 on both ceiling fans intended for commercial applications and those intended for home installation. Some of the fans intended for home use were shipped with a lighting fixture; some were not. Examples of the variety of fans on which the staff received information are shown on the following page.

REVIEW MATTER C

		
Home Ceiling Fan With Lighting Fixture	Home Ceiling Fan Without Lighting Fixture	Industrial Ceiling Fan

Transportation Characteristics of Ceiling Fans, With or Without Lighting Fixtures

Density: Information derived from Research Project 969, including the data provided by Mr. Varshine at the August 8, 2005 meeting, shows that ceiling fans have an overall average density of 11 pcf and an overall range in density from 2.46 to 23.80 pcf. The median density is 11.33 pcf.

When the data from the research project is combined with the NCC Density Study, which contains information on 1273 shipments moving under item 61870, the average density is 9.20 pcf and the range is from 1.26 to 38.06 pcf. The median density is 7.31 pcf.

The data received does not distinguish between ceiling fans with lighting fixtures and those shipped without, so if there are differences in density predicated on whether or not the lighting fixture is included in the shipment, those differences are unknown.

When grouped according to the current subprovisions the following density averages emerge:

<i>Subprovision</i>	<i>Density Grouping (pcf)</i>	<i>Average Density (pcf)</i>	<i>Density Range (pcf)</i>
1	Less than 15	8.59	1.26 – 14.98
2	15 or greater	19.61	15.10 – 38.06

REVIEW MATTER C

Stowability and Handling: Ceiling fans, with or without lighting fixtures, are shipped in fibreboard boxes. Most are unitized on a lift truck skid or pallet. Many fans with lighting fixtures are shipped together in the same box. While Mr. Varshine has indicated to the staff that this method of packaging ceiling fans in the same box with lighting fixtures is the most common, a sales representative at a retailer of ceiling fans in the Washington, DC area indicated to the staff that many ceiling fans and lighting fixtures are shipped in separate boxes. Some ceiling fans are shipped in boxes in pyramid-like configured pallet loads. Such configurations result in loaded densities lower than actual densities. (See photo on right.) Also, many ceiling fans with lighting fixtures in the same or separate boxes are marked with the precautionary wording “Glass” and “Fragile.” This indicates that some added care in stowing and handling may be required with such shipments.



Liability: Ceiling fans are not unusually susceptible to theft. They may be damaged by freight with which stowed, especially those ceiling fans equipped with lighting fixtures. They are not likely to damage other freight. The value per pound ranges from \$.67 to \$52.88 and averages \$12.12. There is no indication of a claim problem. The remaining liability traits should not impact significantly on an evaluation of ceiling fans.

Relationship to NCC Policies and Guidelines:

This research project was initiated in response to a member carrier's concern regarding the difficulty in classifying ceiling fans with lighting fixtures in that they are not specifically provided for in the NMFC and, consequently, Item (Rule) 422, which explains how to classify articles that are combined, must be invoked. Not all of the data received in conjunction with Research Project 969 distinguishes as to whether a lighting fixture is included with the ceiling fan in question. For that reason, the staff is unable to determine if the addition of the lighting fixture alters the density.

As discussed, current information shows that ceiling fans with densities lower than 15 pcf have an average density of 8.59 pcf. A density of 8.59 pcf would be associated with a class 110, according to NCC density guidelines. Ceiling fans with densities of 15 pcf or greater have an average density of 19.61 pcf. A density of 19.61 pcf would usually be associated with a class 70 (the current class applicable to ceiling fans without lighting fixtures), according to NCC density guidelines.

The possible provisions shown on the following page provide the current density break, with a class increase to 110 for ceiling fans with densities less than 15 pcf and no change in class for the ceiling fans with densities of 15 pcf or greater. They are shown in response to the directive of the member carrier that initiated Research Project 969 and in keeping with NCC policies and guidelines.

REVIEW MATTER C

Possible Classification Provisions:

Item No.	Description	Class
	ELECTRICAL EQUIPMENT GROUP: subject to item 60500	
61870	⇒Fans, ceiling, with blades ⇒or complement of lighting fixtures in same or separate container or without blades ⇒or lighting fixtures, see Note, item 61872, in boxes, subject to Item 170 and having a density in pounds per cubic foot of:	
Sub 1	Less than 15	⇒110
Sub 2	15 or greater	No Change
61872	NOTE—No Change.	

**STATEMENT OF ALA CEILING FAN GROUP
ON REVIEW MATTER G
CEILING FANS WITH OR WITHOUT LIGHTING FIXTURES**

This statement is being presented to the NCC Panel considering Review Matter G in NCC Docket No. 2005-3, on behalf of a group consisting of most of the nation's leading manufacturers of ceiling fans, including the following:

Hunter

Casablanca

Craftmade

Regency Fan Corporation

Minka

Fanimation, Inc.

Nicor Lighting and Fans

Concord Fans & Lighting

Thomas Lighting

Canarm

Emerson

Westinghouse Lighting

Fans With Lighting Fixtures

According to a four page Staff Report on Review Matter G obtained from the NCC, this Review Matter was commenced because the current NMFC Item on ceiling fans, Item 61870, identifies the product as "Fans, electric, ceiling without lighting fixtures." Many ceiling fans today include lighting fixtures. Therefore, the narrow defini-

tion of ceiling fans in Item 61870 led to questions about whether such fans must move as mixed shipments.

The NCC Staff Report on Review Matter G suggested that it would be consistent with NCC Policies and Guidelines to broaden the definition of ceiling fans in Item 61870 to read as follows: "Fans, ceiling, with blades or complement of lighting fixtures in same or separate container or without blades or lighting fixtures." ALA and its ceiling fan manufacturer members would support including fans with lighting fixtures in Item 61870. However, no change in class ratings is warranted.

Fan Transportation Characteristics

Instead of simply recommending a broader definition of ceiling fans to encompass fans with or without lighting fixtures in Item 61870, the NCC Staff sought a broad range of information about the transportation characteristics of ceiling fans from ALA and others, including some of the leading ceiling fan manufacturers. This does not appear to have been requested by the carrier for which Review Matter G was initiated.

The NCC Staff Report finds no reason for changing current class ratings on ceiling fans, with or without lighting fixtures, based on the characteristics of stowability, handling or liability. Ceiling fan manufacturers concur in the favorable findings on stowability, handling and liability, and note that carriers actively solicit their business at current class ratings.

The NCC Staff did find possible grounds for proposing a changed class rating on one segment of the fan market based on its analysis of density. Ceiling fan manufacturers dispute this suggestion, which conflicts with our experience and with data collected in the last 60 days in connection with this Review Matter, discussed further below.

Fans With Densities of 15 PCF or Greater

The NCC Staff Report on Review Matter G includes data on the average density of ceiling fans with densities of 15 pounds per cubic foot or greater. The report indicates that the average density of such fans, covered by Item 61870, Sub 2, was 25.94 pcf in 1981 and is now 21.97 pcf, making the current Class 70 rating appropriate.

Ceiling fan manufacturers agree that no increased class rating on fans in the 15 pcf and up category is warranted.

Fans With Densities of Less than 15 PCF

The NCC Staff Report finds that the average density of fans with densities of less than 15 pcf, covered by Item 61870, Sub 1, fell from 8.19 pcf in 1981 to 7.92 pcf in 2005, and the Staff Report suggests that NCC Policies and Guidelines would therefore support increasing the class rating on such fans from the current Class 100 to Class 125.

ALA and its ceiling fan manufacturer members were surprised to find this proposal in the Staff Report because it rests on data that conflicts with the experience of these leading manufacturers, and with common sense. The addition of lighting fixtures to ceiling fans does not decrease density.

Attached to this Statement is documentation obtained from all of the supporting fan manufacturers. Collectively, these manufacturers represent sixty plus percent of the ceiling fan industry. Moreover, since these manufacturers seek to sell as many ceiling fans as possible, their product lines are representative of the products of the industry as a whole.

Not only is the average density of today's ceiling fans in the under 15 pcf category above the 7.92 pcf cited in the Staff Report, but it is above the 8.19 pcf cited in the Staff

report as the average for 1981, consistent with the increased popularity of ceiling fans with lighting fixtures, and consumers' desire for well-made, reliable, quiet fans.

The Staff Report found that the average density for ceiling fans in the under 15 pcf category in 2005 is only 7.92 pcf. The data being supplied with this statement shows that fans with densities below 8 pcf make up an insignificant segment of shipments for the leading ceiling fan manufacturers, as summarized below:

<u>Company</u>	<u>Fans Below 8 PCF</u>
A	1.8% of representative sample (315,274 fans)
B	16% of sales
C	34 models out of 280
D	none
E	5.9% of sales
F	1 model out of 44
G	8% of total shipments
H	none
I	7 models out of 375

Moreover, these same companies have provided average density data on the range of fans below 15 pcf, summarized as follows:

<u>Company</u>	<u>Total Average Density</u>
A	12.1 PCF
B	10.72
C	10.3
D	12.1

E	11.06
F	12.75
G	11.88
H	12.53
I	9.5

Documentation supporting these summaries is attached as Appendices A through I. Letters rather than company names are used to preserve the confidentiality of commercially sensitive information. We note that the identities of the companies that were the sources of ceiling fan densities in the NCC Staff's Report have also not been disclosed.

Based on these facts, ceiling fan manufacturers oppose any change in the class rating of below 15 pcf ceiling fans as unjustified. The NCC Panel is urged to docket a change that does not increase the class ratings in Item 61870, but merely broadens the definition of fans in that item to include fans with or without lighting fixtures.

Respectfully submitted,

Donald S. Varshine
President & CEO
Keystone Dedicated Logistics
(412) 429-2152
dvarshine@Kdlog

ITEMS SELECTED: CELING FANS ONLY 6 MONTHS WORTH OF SHIPPING HYSTORY
 TOTAL UNITS SHIPPED 315,274
 NMFC # 61870 SUB 1

TOTAL QTY OF SKUS SELECTED		NMFC# 61870/S1 LESS 15 PCF	
612		612	100.0%
TOTAL AVERAGE WEIGHT		25.5	
TOTAL AVERAGE CUBES		2.2	
TOTAL AVERAGE DENSITY		12.1	

NMFC# 61870 S1 LESS THAN 15 PCF CLASS 100

ITEMS SELECTED 612 SKUS
 TOTAL UNITS SHIPPED 315,274

WEIGHT RANGE	12.1	TO	62.1
CUBES RANGE	1	TO	6.7
DENSITY RANGE RANGE	6.1	TO	15

DENSITY RANGE DETAILS				SKU	
LBS	TO	LBS	QTY	%	
6.1	TO	7	7	1.1%	
7.1	TO	8	4	0.7%	
8.1	TO	9	21	3.4%	
9.1	TO	10	62	10.1%	
10.1	TO	11	80	13.1%	
11.1	TO	12	99	16.2%	
12.1	TO	13	122	19.9%	
13.1	TO	14	101	16.5%	
14.1	TO	15	116	19.0%	
			612	100.0%	

Item No.	Measurement	Weight	12	19	14.96	1.19	.03	12.60	202.20	100	9,352	Avg
		9	12	19	14.96	1.19	.03	12.60	202.20	100	9,352	5.97%
		9	12	19	14.96	1.19	.03	12.60	202.20	100	2,524	1.61%
		9	12	19	14.96	1.19	.03	12.60	202.20	100	5,233	3.34%
		9	12	19	14.96	1.19	.03	12.60	202.20	100	4,444	2.84%
		9	12	19	14.96	1.19	.03	12.60	202.20	100	28,214	18.01%
		9	12	19	14.96	1.19	.03	12.60	202.20	100	100	0.06%
		9	12	19	14.96	1.19	.03	12.60	202.20	100	100	0.06%
		9	12	19	14.96	1.19	.03	12.60	202.20	100	2,220	1.42%
		9	12	19	14.96	1.19	.03	12.60	202.20	100	100	0.06%
		10	14	21	22.00	1.70	.05	12.93	207.50	100	3,512	2.24%
		10	14	21	22.00	1.70	.05	12.93	207.54	100	7,131	4.55%
		11	15	20	25.00	1.91	.05	13.09	210.11	100	2,097	1.34%
		11	15	20	25.00	1.91	.05	13.09	210.11	100	2,768	1.77%
		12	14	22	21.01	2.14	.06	9.82	157.66	110	7,396	4.72%
		11	15	21	25.30	2.01	.06	12.62	202.51	100	2,723	1.74%
		11	15	21	25.30	2.01	.06	12.62	202.51	100	1,791	1.14%
		11	15	20	25.00	1.91	.05	13.09	210.11	100	4,142	2.64%
		15	19	33	35.00	5.44	.15	6.43	103.21	125	3,860	2.46%
		15	14	17	25.96	2.07	.06	12.57	201.68	100	1,752	1.12%
		15	14	17	25.96	2.07	.06	12.57	201.68	100	616	0.39%
		15	14	17	25.96	2.07	.06	12.57	201.68	100	7,569	4.83%
		12	15	25	29.57	2.60	.07	11.35	182.25	100	5,326	3.40%
		12	15	25	29.57	2.60	.07	11.35	182.25	100	12,167	7.77%
		15	19	33	29.57	5.44	.15	5.43	87.20	150	6,040	3.86%
		15	19	33	39.00	5.44	.15	7.17	115.01	125	5,570	3.56%
		15	14	27	18.70	3.28	.09	5.70	91.47	150	1,973	1.26%
		15	14	27	30.69	3.28	.09	9.35	150.12	110	1,741	1.11%
		15	14	27	30.69	3.28	.09	9.35	150.12	110	1,648	1.05%
		15	19	33	25.69	5.44	.15	4.72	75.76	150	2,954	1.89%
		25	14	13	29.00	2.63	.07	11.01	176.77	100	1,422	0.91%
		27	12	11	30.00	2.06	.06	14.55	233.46	100	3,955	2.52%
		23	15	13	32.00	2.60	.07	12.33	197.88	100	3,089	1.97%
		45	18	13	34.00	6.09	.17	5.58	89.55	150	4,108	2.62%
		22	14	13	26.00	2.32	.07	11.22	180.09	100	2,922	1.87%
		33	20	16	39.00	6.11	.17	6.38	102.43	125	5,994	3.83%
		43	14	32	43.00	11.15	.32	2.87	46.07	250	108	0.07%
								10.72			156,661	

prod_num	prod_desc	Mstr Cft	Mstr Wt	
		0.66	14.01	21.2
		0.66	14.00	21.2
		0.63	13.07	20.7
		0.63	13.03	20.7
		0.63	13.03	20.7
		0.63	13.00	20.6
		0.61	12.09	19.8
		0.61	12.09	19.8
		0.61	12.09	19.8
		0.61	12.09	19.8
		1.01	20.00	19.8
		0.61	12.00	19.7
		0.61	11.04	18.1
		0.63	11.11	17.6
		0.63	11.11	17.6
		0.63	11.11	17.6
		0.80	14.09	17.6
		0.80	14.09	17.6
		1.12	19.03	17.0
		1.12	19.03	17.0
		1.12	19.03	17.0
		0.82	13.07	15.9
		1.04	16.08	15.5
		1.04	16.08	15.5
		1.04	16.08	15.5
		0.78	12.01	15.4
		1.45	22.11	15.2
		1.05	16.00	15.2
		0.79	12.00	15.2
		0.66	10.00	15.2
		0.67	10.12	15.1
		0.80	12.04	15.1
		0.80	12.04	15.1
		0.80	12.04	15.1
		0.80	12.04	15.1
		0.80	12.04	15.1
		29.31	505.98	17.3
		2.01	30.00	14.9
		1.15	17.00	14.8
		1.15	17.00	14.8
		0.75	11.08	14.8
		0.75	11.08	14.8
		0.75	11.08	14.8
		0.75	11.08	14.8
		1.23	18.04	14.7
		1.23	18.04	14.7
		1.23	18.04	14.7
		1.23	18.04	14.7
		1.23	18.04	14.7
		1.23	18.04	14.7
		1.23	18.04	14.7
		1.23	18.04	14.7
		1.23	18.04	14.7
		1.16	17.00	14.7
		1.17	17.00	14.5
		1.12	16.14	14.4
		2.30	33.00	14.3
		0.92	13.14	14.3
		0.92	13.14	14.3
		0.92	13.14	14.3
		0.92	13.14	14.3

37 13.50%

		0.92	13.14	14.3
		1.55	22.08	14.2
		30.28	441.60	14.6
		1.08	15.06	13.9
		1.08	15.06	13.9
		1.08	15.06	13.9
		1.08	15.06	13.9
		1.80	25.00	13.9
		1.80	25.00	13.9
		1.09	15.07	13.8
		1.09	15.07	13.8
		1.09	15.07	13.8
		1.31	18.00	13.7
		1.10	15.11	13.7
		1.10	15.11	13.7
		1.83	25.00	13.7
		0.81	11.05	13.6
		1.33	18.11	13.6
		1.33	18.11	13.6
		1.70	23.12	13.6
		1.03	14.00	13.6
		1.03	14.00	13.6
		1.03	14.00	13.6
		1.03	14.00	13.6
		1.41	19.03	13.5
		1.41	19.03	13.5
		1.41	19.03	13.5
		1.41	19.03	13.5
		0.89	12.01	13.5
		2.09	28.00	13.4
		2.09	28.00	13.4
		2.09	28.00	13.4
		2.09	28.00	13.4
		1.22	16.01	13.1
		1.22	16.01	13.1
		1.22	16.01	13.1
		1.22	16.01	13.1
		1.22	16.01	13.1
		1.22	16.01	13.1
		1.22	16.01	13.1
		1.22	16.01	13.1
		1.30	17.03	13.1
		1.31	17.06	13.0
		1.62	21.09	13.0
		1.62	21.09	13.0
		1.62	21.09	13.0
		1.56	20.14	12.9
		1.56	20.14	12.9
		2.59	33.09	12.8
		2.09	26.09	12.5
		2.09	26.09	12.5
		2.09	26.09	12.5
		1.21	15.06	12.4
		1.21	15.06	12.4
		1.78	22.04	12.4
		1.78	22.04	12.4
		1.06	13.11	12.4
		1.06	13.11	12.4
		1.06	13.11	12.4
		1.14	14.09	12.4
		1.14	14.09	12.4
		2.28	28.11	12.3
		2.71	33.04	12.2
		1.58	19.08	12.1

		1.25	15.06	12.0
		1.34	16.00	11.9
		1.85	22.08	11.9
		2.69	32.00	11.9
		2.69	32.00	11.9
		3.23	38.00	11.8
		3.23	38.00	11.8
		1.45	17.02	11.7
		1.20	14.08	11.7
		1.37	16.00	11.7
		2.08	24.11	11.6
		2.08	24.04	11.6
		2.08	24.04	11.6
		1.40	16.06	11.5
		1.40	16.06	11.5
		1.40	16.06	11.5
		1.85	21.00	11.4
		1.70	19.12	11.2
		1.70	19.12	11.2
		1.70	19.12	11.2
		1.70	19.12	11.2
		1.70	19.12	11.2
		1.70	19.12	11.2
		1.70	19.12	11.2
		1.70	19.12	11.2
		1.70	19.12	11.2
		1.79	20.11	11.2
		1.79	20.11	11.2
		1.79	20.11	11.2
		1.88	21.02	11.2
		2.52	28.09	11.1
		1.98	22.01	11.1
		1.98	22.01	11.1
		1.98	22.01	11.1
		1.98	22.01	11.1
		2.08	23.12	11.1
		2.08	23.06	11.1
		2.08	23.06	11.1
		1.83	20.11	11.0
		1.83	20.11	11.0
		1.55	17.00	11.0
		2.03	22.14	10.9
		2.09	22.01	10.5
		2.09	22.01	10.5
		2.01	21.06	10.5
		2.01	21.01	10.5
		2.11	22.01	10.4
		2.72	28.11	10.3
		2.35	24.00	10.2
		2.27	23.03	10.1
		2.38	24.14	10.1
		2.10	21.03	10.0
		2.10	21.03	10.0
		2.10	21.03	10.0
		195.50	2346.68	12.0
		2.74	27.01	9.9
		2.74	27.01	9.9
		2.74	27.01	9.9
		2.74	27.01	9.9
		2.74	27.01	9.9
		2.27	22.01	9.7

[REDACTED]	2.27	22.01	9.7
[REDACTED]	2.27	22.01	9.7
[REDACTED]	2.29	22.14	9.7
[REDACTED]	2.29	22.11	9.7
[REDACTED]	2.08	20.01	9.6
[REDACTED]	2.29	22.00	9.6
[REDACTED]	2.63	25.01	9.5
[REDACTED]	2.63	25.01	9.5
[REDACTED]	1.29	12.01	9.3
[REDACTED]	3.02	28.06	9.3
[REDACTED]	3.02	28.06	9.3
[REDACTED]	3.02	28.06	9.3
[REDACTED]	3.02	28.06	9.3
[REDACTED]	3.02	28.06	9.3
[REDACTED]	3.02	28.06	9.3
[REDACTED]	3.02	28.06	9.3
[REDACTED]	3.02	28.00	9.3
[REDACTED]	2.62	24.08	9.2
[REDACTED]	2.62	24.08	9.2
[REDACTED]	2.62	24.08	9.2
[REDACTED]	2.62	24.08	9.2
[REDACTED]	2.62	24.08	9.2
[REDACTED]	1.86	17.00	9.1
[REDACTED]	1.86	17.00	9.1
[REDACTED]	1.86	17.00	9.1
[REDACTED]	1.86	17.00	9.1
[REDACTED]	1.86	17.00	9.1
[REDACTED]	3.08	28.11	9.1
[REDACTED]	3.08	28.11	9.1
[REDACTED]	2.89	26.14	9.0
[REDACTED]	2.92	26.14	9.0
[REDACTED]	2.92	26.14	9.0
[REDACTED]	2.92	26.14	9.0
[REDACTED]	2.92	26.14	9.0
[REDACTED]	105.92	990.19	9.3
[REDACTED]	3.17	28.00	8.8
[REDACTED]	2.87	25.06	8.7
[REDACTED]	2.87	25.06	8.7
[REDACTED]	3.59	31.00	8.6
[REDACTED]	3.59	31.00	8.6
[REDACTED]	1.17	10.08	8.6
[REDACTED]	1.17	10.08	8.6
[REDACTED]	2.70	23.00	8.5
[REDACTED]	3.59	30.03	8.4
[REDACTED]	2.40	20.00	8.3
[REDACTED]	2.97	24.14	8.1
[REDACTED]	2.97	24.14	8.1
[REDACTED]	2.36	19.08	8.1
[REDACTED]	3.37	27.06	8.0
[REDACTED]	3.37	27.06	8.0
[REDACTED]	3.37	27.06	8.0
[REDACTED]	3.37	27.06	8.0
[REDACTED]	3.02	24.04	8.0
[REDACTED]	3.02	24.04	8.0
[REDACTED]	3.02	24.04	8.0
[REDACTED]	57.96	481.03	8.3
[REDACTED]	4.09	32.00	7.8
[REDACTED]	4.09	32.00	7.8
[REDACTED]	3.27	25.11	7.7
[REDACTED]	2.88	22.00	7.6
[REDACTED]	3.06	23.00	7.5
[REDACTED]	3.06	23.00	7.5

41 14.90%

20 7.30%

		3.06	23.00	7.5	
		3.06	23.00	7.5	
		3.06	23.00	7.5	
		3.06	23.00	7.5	
		2.83	20.00	7.1	
		3.15	22.01	7.0	
		3.28	22.01	6.7	
		3.28	22.01	6.7	
		3.28	22.01	6.7	
		3.28	22.01	6.7	
		2.00	13.07	6.5	
		2.00	13.07	6.5	
		2.17	14.09	6.5	
		3.12	20.00	6.4	
		3.33	20.00	6.0	21 7.60%
		64.41	459.39	7.1	
		2.76	16.08	5.8	
		3.47	20.00	5.8	
		3.49	19.08	5.5	
		3.01	16.08	5.3	
		3.95	21.05	5.3	
		4.15	22.01	5.3	
		4.15	22.01	5.3	
		4.15	22.01	5.3	
		4.44	22.01	5.0	
		4.04	20.00	5.0	
		4.08	20.00	4.9	
		4.11	20.00	4.9	
		4.38	20.00	4.6	13 4.70%
		50.18	260.33	5.2	
Total		533.56	5485.20	10.3	

<u>Item</u>	<u>Kilograms</u>	<u>Pounds</u>	<u>Cubic Ft</u>	<u>Lbs/Cu Ft</u>	<u>% Sales</u>
42" [REDACTED]	5	11.023	0.85	12.968	1.7%
42" [REDACTED]	4.8	10.582	0.84	12.598	12.5%
52" [REDACTED]	9	19.842	2.24	8.858	2.9%
52" [REDACTED]	8	17.637	1.34	13.162	3.0%
52" [REDACTED]	7.4	16.314	1.18	13.826	19.6%
52" [REDACTED]	7	15.432	1.33	11.603	7.5%
52" [REDACTED]	6	13.228	1.2	11.023	3.2%
52" [REDACTED]	5.5	12.125	0.80	13.624	5.4%
52" [REDACTED]	6	13.228	1.18	11.210	44.2%

Cat. No.	Weight	Length	Width	Height	lbs. per cubic		Percentage of Sales
					Cubic Feet	cubic ft.	
	32	18	18	31	5.81	5.5	4-6 pcf 1.30%
	41	18	18	39	7.31	5.6	
	38	18	18	36	6.75	5.6	
	22	26	21	11	3.48	6.3	6-7.9 pcf 4.60%
	26	19	19	19	3.97	6.6	
	48	18	18	39	7.31	6.6	
	28	29	14	15	3.52	7.9	8-9.8 pcf 5.30%
	40	33	18	13	4.47	9.0	
	38	30	16	15	4.17	9.1	
	16	21	12	12	1.75	9.1	10-11.9 pcf 5.10%
	84	40	22	17	8.66	9.7	
	44	33	18	13	4.47	9.8	
	35	23	22	12	3.51	10.0	12-14.4 pcf 20.30%
	48	44	15	12	4.58	10.5	
	46	26	19	15	4.29	10.7	
	43	27	19	13	3.86	11.1	15-17.5 33.90%
	41	27	17	13	3.45	11.9	
	21	19	17	9	1.68	12.5	
	9	28	11	4	0.71	12.6	20.30%
	14	13	11	13	1.08	13.0	
	35	25	14	13	2.63	13.3	
	49	42	14	10	3.40	14.4	33.90%
	35	25	14	12	2.43	14.4	
	51	29	16	12	3.22	15.8	
	20	11	11	17	1.19	16.8	33.90%
	20	11	11	17	1.19	16.8	
	78	35	22	10	4.46	17.5	
	31	17	15	12	1.77	17.5	2.3%

FANS

COMPANY F

PRODUCT	LENGTH	WIDTH	HEIGHT	CUBIC FT	WT.	LBS CUBIC FT	FRT CLASS	CODE
48' 102" TRAILER	2880	102	140	23800		0.00	100	336
53' 102" TRAILER	3180	102	140	26279		0.00	100	336
	60	60	2	4.17	60	14.4	100	336
	13.75	13.75	1.5	0.16	2	12.2	100	336
	14.5	14.5	14.5	1.76	23	13.0	100	336
	14.75	14.75	14.5	1.83	22	12.1	100	336
	14.5	14.5	14.5	1.76	21	11.9	100	336
	20.25	14.25	10.75	1.80	17	9.5	100	336
	20.75	12.75	8	1.22	16	13.1	100	336
	17.25	17.25	12	2.07	16	7.7	100	336
	23.25	18	14.25	3.45	28	8.1	100	336
	25.5	20	10	2.95	35	11.9	100	336
	21.5	13.5	9	1.51	19	12.6	100	336
	16	10.5	7.25	0.70	13	18.4	70	335
	19.5	12.25	7.75	1.07	16	14.9	100	336
	39.75	12	12.5	3.45	31	9.0	100	336
	21.25	13.5	13	2.16	25	11.6	100	336
	14.5	14.5	14.5	1.76	21	11.9	100	336
	25.5	14.5	10.5	2.25	26	11.6	100	336
	14.5	14.5	14.5	1.76	23	13.0	100	336
	20.75	10	13.25	1.59	21	13.2	100	336
	20	12.5	12.25	1.77	19	10.7	100	336
	19.75	11.25	13.5	1.74	19	10.9	100	336
	21	16	11	2.14	26	12.2	100	336
	39	6.5	6.5	0.95	17	17.8	70	335
	29	12.5	10	2.10	24	11.4	100	336
	28	12.5	9.5	1.92	23	12.0	100	336
	20.75	10.75	14	1.81	22	12.2	100	336
	19.75	14.5	10.5	1.74	22	12.6	100	336
	17.5	11.75	11.25	1.34	20	14.9	100	336
	27.5	14.75	11.25	2.64	26	9.8	100	336
	21.5	14	11.5	2.00	21	10.5	100	336
	21.75	7.75	13	1.27	17	13.4	100	336
	17.25	10	9	0.90	13	14.5	100	336
	17.25	10	9	0.90	13	14.5	100	336
	17.5	10	10	1.01	13	12.8	100	336
	21.5	13	8	1.29	20	15.5	70	335
	20.25	17	20.25	4.03	35	8.7	100	336
	19.5	19.5	24	5.28	48	9.1	100	336
	29.5	10	17.5	2.99	29	9.7	100	336
	14.5	14.5	14.5	1.76	21	11.9	100	336
	14.5	14.5	14.5	1.76	22	12.5	100	336
	14.5	14.5	14.5	1.76	24	13.6	100	336
	19.75	19.5	11.5	2.56	29	11.3	100	336
	17	10	9.5	0.93	14	15.0	100	336
	20.5	13	12	1.85	17	9.2	100	336
	21	13.5	10	1.64	22	13.4	100	336
	16	10.5	7.25	0.70	13	18.4	70	335
	19.5	12.25	7.75	1.07	16	14.9	100	336
	26.25	13.25	9.5	1.91	19	9.9	100	336
	20	12.5	7.5	1.09	17	15.7	70	335
	23	15	10	2.00	26	13.0	100	336
	12.5	18.5	24	3.21	45	14.0	100	336
				0		#DIV/0!	#DIV/0!	#DIV/0!
				0		#DIV/0!	#DIV/0!	#DIV/0!

COMPANY G

TOP 10 FANS

<u>Model</u>	<u>Carton Size</u>	<u>Weight</u>	<u>PCF</u>	<u>% of Shipments</u>
[REDACTED]	19x12x9 in.	16 lbs.	13.45 ✓	18%
[REDACTED]	20x13x10	19	12.67	12
[REDACTED]	21x12x11	20	12.5	10
[REDACTED]	24x20x10	32	11.5	10
[REDACTED]	23x13x13	26	11.6	9
[REDACTED]	32x12x22	30	6.13 ✓	8
[REDACTED]	21x15x12	28	12.79	7
[REDACTED]	15x15x13	24	14.2 ✓	6
[REDACTED]	26x16x12	35	12.11	5

Average 11.88 pcf

COMPANY H

<u>Model</u>	<u>Carton Cube</u>	<u>Weight</u>	<u>Density</u>
1	1.19	14.77	12.41
2	1.45	19.00	13.10
3	1.55	17.00	10.96
4	1.68	23.80	14.17
5	1.56	15.80	10.13
6	1.75	22.60	12.91
7	1.35	18.90	14.00

Average 12.53 pcf

COMPANY I

Fans

PCF

52
100
68
50
48
42
8
4
1
2
375

14
13
12
11
10
9
8
7
6
5

Average 9.5