

**Campbell Operations**  
3990 East Market Street  
York, Pennsylvania 17402-2769  
Phone: (717) 755-2933  
Fax: (717) 757-1634



February 28, 2001

U. S. Department of Transportation  
Dockets Management Facility  
Room PL-401  
400 Seventh Street, SW  
Washington, DC 20590-0001

Re: Comments on Proposed Changes to FMCSA  
49 CFR Parts 392 and 393  
FMCSA Docket No. FMCSA-97-2289

Dear Sirs,

On behalf of the National Association of Chain Manufacturers (NACM), below please find our comments and technical corrections.

## **1) Reference to NACM Welded Steel Chain Specifications:**

The current edition of the above specification is dated 11/15/99. The reference in the document is to the older 5/1/96 version. We would request that the reference change to the current 11/15/99 version.

The location of the reference is in the Table under Section 393.104(d).

Additional Note: The address for the NACM has changed since the 1996 version. The address is given below. This would effect the document reference in Section 393.7(b).

National Association of Chain Manufacturers  
6232 Roudsby Lane  
Alexandria, VA 22315-5282

## **2) Tables to 393.108:**

- a) For the chain Table, we request the addition of the working load limit (WLL) for 7mm (1/4") Grade 100 chain. This chain is a standard grade chain, and the WLL was listed in both the 1996 and 1999 NACM Specifications.

The WLL for 7mm (1/4") Grade 100 chain is 1,950 kg (4,300 lb).

b) Chain Mark Examples:

Standard chain markings no longer include the letter code markings shown in the FMCSA proposed document. These letter codes were not used by manufacturers, and have been removed from the NACM and the ASTM (American Society for Testing and Materials) specifications for welded chain. This was true even for the 1996 revision of the NACM specification. In addition, the designation “40” has never been used as a designator for Grade 43 chain. We would therefore recommend changing the table as noted below:

	Grade 30 Proof Coil	Grade 43 High Test	Grade 70 Transport	Grade 80 Alloy	Grade 100 Alloy
<b>Document as Proposed in Federal Register</b>					
Chain Mark Examples					
Example 1	PC	HT		T	
Example 2	3	4	7	8	10
Example 3	30	40	70	80	100
<b>Proposed Changes to Table</b>					
Chain Mark Examples	3, 30, or 300	4, 43, or 430	7, 70, or 700	8, 80, or 800	10, 100, or 1000

### **3) Section 393.126(c)(2) Prohibition on crossing of chains when coils are transported with eyes crosswise.**

From the document review, we believe that the word “chains” in the title of this subsection should be changed to “tiedowns”. The application is not restricted to chains, and we believe that the prohibition would apply to all forms of tiedowns, not just chains.

We thank you for the opportunity to comment upon and correct the proposed document prior to finalization and release.

Sincerely,

Brian D. Todd  
Chairman, NACM Technical Committee