

June 29, 2023

National Conference on Weights & Measures (NCWM)
Specifications and Tolerances (S&T) Committee
1135 M Street, Suite 110
Lincoln, Nebraska 68508

RE: Form 15 Support Memo – NIST Handbook 44, Section 2.25 Amendments, Weigh-In-Motion Systems Code

Dear Specifications and Tolerances (S&T) Committee,

The Transportation and Development Institute (T&DI) of the American Society of Civil Engineers (ASCE) urges the NCWM S&T Committee to expeditiously update the NIST Handbook 44 to allow for the use of WIM systems for automated enforcement.

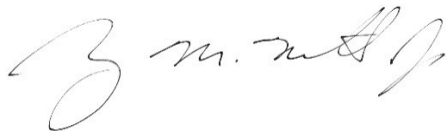
Founded in 1852, ASCE is the oldest national civil engineering organization and represents more than 150,000 civil engineers in private practice, government, industry, and academia. Established in 2002, the Transportation & Development Institute (T&DI) is one of the nine (9) technical Institutes of ASCE. Representing the community of transportation professionals and expertise within the 150,000+ strong global membership of the Society, T&DI serves as the home for all transportation & development-related activities at ASCE. Our members are dedicated professionals who hold paramount public health, safety, and welfare as they design, build, construct, operate, and maintain the built environment. ASCE's 2021 Infrastructure Report Card, which gave our nation's roads a "D," recommends prioritizing federal action that can improve the safety and security and systems across our nation's communities. Furthermore, in ASCE's Public Policy Statement 367, "Highway Safety," it is encouraged that Vision Zero principles, along with regular inspection of existing roadway systems and enhancing the organization. It is through this commitment that our members recognize the impact of evolving technology on our roadways, support efforts to update to the NIST Handbook 44, and to advocate for policies that enhance roadway safety, and preservation of our transportation infrastructure.

Amending the WIM Systems Code will also support the needs of New York City Department of Transportation's mandate to protect the Brooklyn Queens Expressway (a critical regional freight corridor) by using Weigh-in-Motion (WIM) technology for automated enforcement and will serve as a proof of concept for other cities advancing compliance monitoring technology. Like the BQE, the national roadway infrastructure and network, including bridges and pavement, handles substantial daily traffic, including trucks. While trucks are an integral part of the freight movement network in distributing goods and services to various communities, many trucks are often found to be overweight beyond the FHWA legal load limits, one of the primary causes of accelerated deterioration of pavement and bridges. Implementing automated weight enforcement on the BQE would be a significant step forward in improving the safety and sustainability of goods movement in the NYC region, foster a culture of compliance with truck rules, reduce infrastructure damage, and reduce the risk of accidents. Ensuring that it is safe and efficient for all users is of utmost importance.

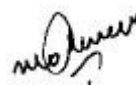
The current overweight enforcement practices at the stationary weighing stations, combined with using mobile enforcement units, are ineffective in substantially reducing the percentage of overweight vehicles. With automated weight enforcement there is an opportunity to foster a culture of compliance, automate the enforcement tasks of officers, freeing them up so they can do more inspections for other safety issues related to Commercial Motor Vehicles.

New York State has provided authority to New York City to implement automated WIM enforcement on BQE triple cantilever. With several states, including Maryland, California, Florida, Montana, North Carolina, and Wisconsin, proving the accuracy of current WIM technology, the amendment of Form 15, Section 2.25 to expand its screening provisions to include automated vehicle weight enforcement using WIM is both prudent and justified. This update would allow the United States to catch up with other countries that have successfully implemented automated weight enforcement, including China (2004), the Czech Republic (2010), Russia (2013), Hungary (2016), France (in process) and Brazil (in process). ASCE T&DI strongly supports efforts to update the NIST Handbook 44, WIM systems code, and strongly urge the implementation of automated weight enforcement as a critical step forward in improving the safety and sustainability movement of people and goods. Thank you for your attention to this important issue.

Sincerely,



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ASCE Transportation and Development Institute (T&DI)



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