



December 6, 2022

Nick Owens
Stark County Office of Weights and Measures
110 Central Plaza S # 220
Canton, Ohio 44702

RE: NIST Handbook 44 Amendments, Weigh-In-Motion Systems Code

Dear Mr. Owens:

The New York City Department of Transportation is tasked with maintaining and rehabilitating the Brooklyn-Queens Expressway (BQE) triple-cantilever structure along Interstate 278. Part of our responsibility is preventing its use by illegally overweight vehicles, which can accelerate deterioration. To that end, we are excited to be implementing a first-in-the-nation Weigh-in-Motion (WIM) automated enforcement system along the triple-cantilevered section of the Brooklyn-Queens Expressway. We have an ambitious goal to begin issuing violations to offending vehicles in Spring 2023 and a critical component in achieving it is to update existing standards to reflect this innovative approach. I have therefore requested that the Office of Weights and Measures expeditiously update the NIST Handbook 44 through a concentrated review of our Form 15 proposal, with the objective that you and your fellow members of the Standards and Tolerances Committee will be able to endorse and accept this amendment at the National Conference on Weights and Measures interim meeting to be held in January.

We understand voting of amendments is typically done at the July annual meeting but are requesting the S&T Committee consider an earlier timeline due to the critical need to enforce weight limits on our infrastructure. While this is an aggressive timeline, we believe it is achievable and will be meeting weekly with NIST Technical Staff meet with us between now and the January meeting to address any comments from their reviewers. WIM sensors already installed on the BQE have revealed overweight vehicles excessively exceeding FHWA legal load limits, with gross vehicle weights (GVW) that range from just over 80,000 lbs. to as high as 200,000 lbs. While we collaborate with our partners at the NYPD on enforcement, we were able to cite only 14.7% of the actual number of overweight vehicles between February and December of 2021. These conditions are not unique to New York City, and current enforcement practices here and around the country are unable to substantially reduce the percentage of overweight vehicles and protect the nation's vital but aging infrastructure.

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With several states, including Maryland, California, Florida, Montana, North Carolina, and Wisconsin, proving the accuracy of current WIM technology, the amendment of Section 2.25 to expand its screening provisions to include automated vehicle weight enforcement using WIM is both prudent and justified. This update would also 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).

We appreciate your attention to this matter. Should you have additional questions at this stage please reach out to Paul Schwartz, Deputy Commissioner at pschwartz@dot.nyc.gov or (212) 839-6300. Thank you in advance for your assistance with this critical work.

Sincerely,

A handwritten signature in black ink, appearing to read 'Ydanis Rodriguez', with a stylized, cursive script.

Ydanis Rodriguez
Commissioner

NYC Department of Transportation
Office of the Commissioner

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