FORM 15, ATTACHMENT C
List of Support Letters
PROPOSAL TO AMEND NIST HANDBOOK 44, SECTION 2.25

- International Road Dynamics (IRD)
- ~~Maryland Department of Transportation~~ **(Removed at the Request of the Maryland DOT)**
- C2SMART Tier 1 University Transportation Center at New York University

INTERNATIONAL ROAD DYNAMICS INC.
INTELLIGENT TRANSPORTATION SYSTEMS

November 15, 2022 File: 134-NY

Kistler Instrument Corp.
30280 Hudson Drive,
Novi MI 48377, USA
Attention: Jess Helmlinger, Regional Manager North America

RE: IRD WEIGH-IN-MOTION SUPPORTING UPDATE TO HANDBOOK 44

To Whom It May Concern:

International Road Dynamics as the vendor and service provider of Weigh-in-Motion (WIM) products and systems would like to state:

- **International Road Dynamics supports the Form 15 proposal to amend Handbook 44, Section 2.25 Weigh-In-Motion Systems Used for Vehicle Screening and Enforcement as it is vital to improve commercial vehicle safety, protect infrastructure, and help the limited commercial vehicle enforcement officers be more efficient in their jobs.**
- **As a WIM system manufacturer and provider with over 40 years' experience, what is proposed can be met by multiple technologies we provide.**
- **Additionally, this will help the United States and North America stay current and compete with efficiencies gained in other parts of the world that are doing this.**
- **We encourage that this proposal be made a voting item at the National Conference.**

If you have any additional questions or concerns, please feel free to contact me directly via email at roy.czinku@irdinc.com or via telephone at 306-653-6627.

Best Regards

Roy J. Czinku, A.Sc.T
VP ITS Solutions and Maintenance Services

NYU TANDON SCHOOL OF ENGINEERING

C2SMART
CONNECTED CITIES WITH SMART TRANSPORTATION
A USDOT University Transportation Center

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November 14, 2022

National Conference on Weights and Measures (NCWM)
1135 M Street, Suite 110
Lincoln, Nebraska 68508
Attn: Chair of Specification and Tolerances (S&T) Committee

RE: NIST Handbook 44 Section 2.25 Amendments for WIM - Weight-In-Motion Systems Code

Dear Mr. Glass,

The C2SMART USDOT Tier 1 University Transportation Center (UTC) at New York University (NYU) is writing to express our strong support for the NIST HB44 Section 2.25 Amendment for WIM Systems. Based on our years of experience, we are confident that the WIM system is capable of providing legally acceptable accuracy to enforce overweight vehicles. We are writing to urge the NCWM's S&T Committee to expeditiously consider it for **voting Item** on the NCWM agenda as the technology is ready for prime time.

Our proposal for the implementation of WIM enforcement on the Brooklyn Queens Expressway (BQE) was reviewed by many anonymous reviewers and received great feedback and support. This is an project funded by C2SMART since it is an excellent fit in terms of its main research theme to enhance the safety and resiliency of our national roadway infrastructure, including bridges and pavement, and freight logistics. While trucks have been 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 Federal Highway Administration (FHWA)'s legal load limits. Illegally overweight vehicles beyond the FHWA's legal load limits in gross and axle would exacerbate the deterioration of aging pavement and bridges. In particular, New York City Department of Transportation (NYCDOT)'s enforcement officers have been able to cite only 14.7% of the actual number of overweight vehicles by the WIM system along the Interstate Highway I-278 in Brooklyn and Queens between February and December of 2021. Also, in New Jersey, only 6.4% of the total overweight vehicles identified by > 90 WIM systems across the state were cited at the static weighing stations. The current overweight enforcement practices at the stationary weighing stations, combined with mobile enforcement units, are ineffective in substantially reducing the percentage of overweight vehicles.

The automated overweight enforcement practices have been implemented in many European countries (e.g., Hungary, Czech Republic, Russian Federation) and Asian countries

(e.g., China, Japan). It was proven that the current WIM technology could provide accuracy for automated vehicle weight enforcement using WIM systems. The C2SMART Tier 1 UTC would like to request your organization to consider the amendment for "voting item" because based on our research, we know that the WIM technology is mature enough to implement and accurate enough to cite overweight vehicles automatically by upgrading the overweight enforcement practice more efficiently. If you have any further questions about his background or qualifications, please do not hesitate to contact If you need further information, please feel free to contact me at 1.646.997.3691 or email to kaan.ozbay@nyu.edu.

Sincerely,

Kaan Ozbay, Ph.D.
Professor & Director
C^{2}SMART Center (A Tier 1 USDOT UTC)
Department of Civil and Urban Engineering &
Center for Urban Science & Progress (CUSP) (Affiliated)
Tandon School of Engineering
New York University