

October 30, 2023

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: WIM-23.1, NIST Handbook 44 Amendments, Section 2.25 Weigh-In-Motion Systems Code

Mr. Flint:

We want to thank the committee for their valuable input throughout the last year in moving this proposal forward. We have updated the proposal to address two major items:

1. After the annual meeting, we realized that removing the word “tentative” from the screening code would have inadvertent repercussions for states that currently use Section 2.25 WIM code for screening and have their own procedures for calibration. While it appears not many use the tentative screening procedure from the handbook, that has not been the focus of our attention and we do not want to impede the ability of the various states to manage overweight trucks on their highways. We discussed this concern with NIST and sought their guidance and brought it up at all of the regional meetings. Based on guidance from NIST, we have edited our proposal to make it a stand alone chapter Section 2.26, updated the title of the chapter as well as updated the language at the top of the chapter accordingly. This way the existing Section 2.25 will remain unchanged for the tentative screening code, allowing for the screening code to be separated from the direct enforcement requirements.
2. Some of the gaps that were identified by NIST between the proposal and the relevant OIML and 2.20 Scale Codes were discussed with NIST, and language has been added to make the proposal more complete and in line with comparable sections in the handbook. In addition, other items such as acceptance, tolerance, language to address empty trucks as well as those carrying liquid load have also been incorporated in collaboration with NIST.

We have participated in several regional meetings and want to reiterate our position that comparison of WIM System with dynamic weighing for enforcement to static scale codes is not appropriate as they are different systems that function completely differently. This proposal is for enforcement use only and not for commercial use. While different jurisdictions have different ways of enforcing truck weight limits, there is a high degree of inherent inefficiency in all the existing methodologies whether it is due to lack of space for static scales, personnel limitations, or the speed with which a screening site operates. As a result, the number of violations issued compared to the actual volume of overweight vehicles on the road does not drive a culture of compliance and creates an uneven playing field. This has the potential to create unsafe conditions for other roadway users while our infrastructure continues to deteriorate at an accelerated pace due to the overloading. The inclusion of this proposal in the code provides clear guidance for those jurisdictions who want to use WIM for enforcement and rely on the handbook for enforcement related efforts. This will not require jurisdictions to change their enforcement practices if they are not using WIM for enforcement or if they do not currently use the handbook for other enforcement equipment.

We request that this important update make it into the hard copies of Pub 15 as well as get published on the website so that the members can review adequately prior to the Interim Meeting in January. We

hope that based on the above efforts we have adequately addressed the concerns raised will move forward to a voting status at the next interim meeting.

We look forward to continued collaboration with the S&T committee members.

Sincerely,

WIM-23.1 Submitters

Cc: S&T Committee members