

C Joseph Allaby - Comments

This is a Comment on the **Federal Highway Administration (FHWA)**
Proposed Rule: **National Performance Management Measures:
Assessing Pavement Conditions and Bridge Conditions for the
National Highway Performance Program**

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Comment

After viewing both webinars and reviewing the Federal Register over the past couple of weeks, I am left with some questions:

1. Baseline Report - 490.107(b)(1)

- Will all pavement condition metrics (IRI, Rutting, Faulting, Cracking) be required on the Baseline Report?
- Will both Interstate and Non-Interstate NHS pavement data be required on the Baseline Report?
- Will pavement data from 2014, 2015, and 2016 collection seasons be allowed on the Baseline Report or is only 2016 data permitted?

2. Missing Data - 490.313(b)(4)(I)

- If we are unable to collect and report pavement data on a section of road because it is in the process of improvement, will it still default to a "Poor" rating?

3. Proposed Field Manual

- When will the proposed field that reflects these changes become available?
- Will the HPMS Field Manual continue to be re-released every year?

4. Cracking - 490.311(b)(2)

- The current HPMS Field Manual states that transverse cracks under 6 feet in length are not to be counted as part of the reported cracking length. Will smaller transverse cracks now be included in "the total area containing visible cracks"?
- The current HPMS Field Manual states that only fatigue cracking in the wheel paths are to be counted as part of the reported percent of fatigue cracking. Will fatigue cracking anywhere in the lane now be included in "the total area containing visible cracks"?
- The current HPMS reporting methods require transverse cracks to be reported in length and fatigue cracks be reported in area. The new Cracking Percent metric is calculated by "the percent of the total area containing visible cracks", how is this calculated since a transverse cracking linear measurement has no area?

5. Faulting - 490.311(b)(4)(iii)

- Will faulting be an average of all pavement joints in a section with

or without measurable faulting heights, or will it be an average of only the joints with faulting measurements greater than zero?

6. Bridges - 490.313(f)(1)

- Are State DOTs responsible for removing sections from the report that have bridges in them?

- If State DOTs are required to remove bridge sections from the report, how will these sections not be automatically graded as "Poor" because it is considered missing data?

- Will sections that contain bridge approaches also be removed?

7. Assessing Pavement Condition - 490.307

- Part (a) of this section refers only to "Good" and "Poor" ratings, however, part (b) of this section refers to "Good", "Fair", and "Poor" ratings. Can you please clarify where and how the transition from the two category rating system to the three category rating system takes place?

I appreciate the time and effort required for answering these questions. Thank you.