


C Luis Rodriguez - 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

I recommend that a level of prevailing severity level (high, medium or low) be added to the HPMS "Cracking %" reporting requirement to be used as one of the pavement condition rating threshold in the regulation. This will help better describe the severity of the cracking present in each HPMS reporting section (0.1 mile in length), therefore resulting in a more accurate assessment of the actual pavement condition in each HPMS reporting section. For example, a HPMS section may have less than 5% of cracking on the surface but the severity of that cracking may be high based on prevailing standards, while another HPMS section may have 20% cracking with low severity. For me the section with < 5% cracking may be consider poor based on the severity of its cracking instead of good based on the current criteria included in the proposed regulation.