



April 13, 2015

Federal Highway Administration
U.S. Department of Transportation
Docket Operations, M-30
West Building Ground Floor, Room W12-140, 1200
New Jersey Avenue SE.,
Washington, DC 20590

Re: Comment on Notice of Proposed Rulemaking
Docket Number: FHWA USDOT-2013-0053

To Whom It May Concern:

1. The Memphis Urban Area MPO supports the transition to numerical based scoring to assess the quality of NHS roads and bridges as well as interstate pavement condition. Using numerical scores removes some of the ambiguity of more qualitative scores such as Good, Fair, or Poor.
2. The Memphis MPO also supports aligning our scoring system with the Tennessee Department of Transportation (TDOT) and the Mississippi Department of Transportation (MDOT) scoring system because, although a local scoring system would possibly reflect local conditions in a more refined matter, the extra step of defining these measures at the MPO level and integrating them in with TDOT and MDOT could be an unnecessary and burdensome step for the MPO.
3. To streamline the process and create a reporting system that is more unified and comprehensive, we support standardizing the tracking of infrastructure conditions with TDOT and MDOT to reach national performance goals, increase transparency and reduce some of the difficulties of trying to integrate an MPO based tracking and monitoring system.
4. We request further clarification on the frequency and method of reporting data to the State DOTs and, in turn, FHWA. Does FHWA have a conceived process in which the data reporting will occur?
5. In conclusion, we support adhering to established targets set by the State DOT's and FHWA for purposes of standardization and ease of empirical based reporting and data harmonization.