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

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### Comment

There should be separate pavement ratings for overall pavement performance and pavement maintenance level of service (LOS). Overall pavement performance can be expressed by PSI (composite rating) and IRI (roughness). However, these measures can be influenced by a number of different pavement deficiencies, each of which may require different rehab and maintenance treatments.

For pavement maintenance, there should be several indicators of LOS, one feature for each major maintenance activity, such as Linear Cracking, Block Cracking, Rutting, Raveling, and Potholes. These can be adequately expressed using measures such as % of surface area deficient, linear feet of cracking per lane-mile, and number of potholes per lane-mile. Such measures, collected on a sample basis, can be used to evaluate the level of maintenance service being provided and can be expressed on a 5-point report-card scale of A to F for non-technical presentations. These measures have also been used successfully to adjust maintenance work plans and budgets to reach desired levels of service.

A similar process can be used for rating bridge maintenance LOS, for bridge elements such as superstructure, substructure, deck, deck joints, approaches, railings, drains, etc.

We described the process for evaluating maintenance LOS for pavement, bridges, and other roadway and roadside assets in considerable detail in NCHRP Report 677. The subject in that report was Interstate highways, but the approach works equally well for all other classes of highways. Several state DOTs are currently using this approach to rate the LOS for various highway assets, as well as for developing their performance-based maintenance programs.