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June 1, 2026

Ms. Jazmyne Lewis
Information Collection Officer
Federal Highway Administration
1200 New Jersey Ave, SE
Washington, DC 20590

RE: FHWA-2026-0496

Dear Ms. Lewis:

The Texas Department of Transportation appreciates the opportunity to respond to the Federal Highway Administration's (FHWA) Request for Comment (RFC) on its information collection activities regarding "Bridging the Data Gap in Pavement Management and Quality Assurance."

TxDOT supports FHWA's goals in advancing digital project delivery and data integration across the transportation sector and finds that the proposed collection aligns with national and state efforts to modernize infrastructure delivery and transition to digital environments. The information collected could help FHWA identify gaps in data consistency across State agencies and support the development of guidance. In response, TxDOT offers the following comments:

1. **Necessity of the Information Collection:** TxDOT supports the proposed information collection and believes it is necessary as FHWA advances digital project delivery, intelligent construction, and Building Information Modeling (BIM) for infrastructure. Understanding the current state of practices across state Departments of Transportation is essential to inform federal guidance, identify scalable best practices, and prioritize future research. Without structured, nationwide data collection, FHWA would lack the foundation needed to support consistent implementation and advancement of these emerging technologies across agencies.
2. **Accuracy of Estimated Burdens:** TxDOT finds the estimated burden of approximately 30 minutes per response to be generally reasonable for a single respondent. However, for a comprehensive and coordinated agency response, input may be required from multiple internal divisions. As a result, the total effort required for TxDOT to prepare a consolidated response could take significantly more time.
3. **Enhancing the Quality, Usefulness, and Clarity of Information Collected:** TxDOT recommends that FHWA: 1) Clearly define key terms such as *digital project delivery*, *intelligent construction*, and *BIM* to ensure consistent interpretation across state responses; and 2) Structure questions to distinguish between existing operational practices and emerging, pilot, or

aspirational activities. These refinements could improve the comparability and overall usefulness of the information collected.

4. **Minimizing Collection Burdens:** TxDOT suggests that FHWA consider implementing the following measures to reduce respondent burden: 1) Use a web-based questionnaire platform, 2) Provide the ability to upload existing documentation (e.g., workflows, policies, or guidance documents), and 3) Allow for collaborative submission capabilities so multiple subject-matter experts can contribute to a single unified response. These approaches should improve efficiency while maintaining the quality of responses.

TxDOT appreciates FHWA's leadership on this issue and looks forward to continued collaboration in supporting these efforts. If you have any questions, please call me at (512) 305-9515, or you or your staff may contact Melanie Alvord, Director, Federal Affairs, at (512) 944-5135 or Melanie.Alvord@txdot.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "M. Williams", with a stylized, cursive script.

Marc D. Williams, P.E.
Executive Director

cc: Darran Anderson, Senior Director, Strategy and Innovation
Melanie Alvord, Director, Federal Affairs