Public Comment to FHWA's Notice of Request for Renewal of a Currently Approved Information Collection
Docket No. FHWA-2026-0892
Submitted by: W.D.M. (USA) Limited
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To Whom it May Concern:

On behalf of W.D.M. (USA) Limited (WDM USA), a Richmond, Virginia-based leader in road safety and pavement performance management, I respectfully submit these comments in response to FHWA's request for public comment on the renewal of transportation performance management (TPM) data collection requirements from state Departments of Transportation (DOTs).

WDM USA is a nationally recognized expert in pavement friction measurement and management. Our flagship technology, SCRIM, is the world's most-used continuous pavement friction measurement (CPFM) device and has been used by FHWA to demonstrate the importance of a proactive, systemic, data-driven, and cost-effective approach to pavement safety.

With decades of experience supporting friction management programs globally and across the U.S., WDM has an interest in how pavement safety performance data is collected, reported, and used to inform infrastructure investment decisions. We offer a technical perspective on how CPFM data strengthens the safety and performance of U.S. roadways and helps stop crashes before they occur.

To that end, we write to address how to enhance the quality, usefulness, and clarity of the collected information specified by FHWA's notice. Specifically, **we encourage FHWA to evaluate the inclusion of pavement friction as a functional safety metric in the TPM Biennial Report and the National Performance Management Measures (NPMM) it encompasses**.

The Case for Friction as a TPM Safety Metric

The current NPMM track pavement condition metrics such as cracking, rutting, and ride quality that speak to pavement life and driver comfort but are poor predictors of crash risk and safety performance. A road can score well on existing metrics while having dangerously low friction that could contribute to crashes, especially those causing serious injury and death. Without a pavement safety performance metric in the NPMM, states are unable to conclude whether the pavement data being collected and reported – and the investments being made as a result of that data – also results in safer roads.

Together, roadway departure and intersection crashes account for approximately 75 percent of all traffic fatalities nationwide, and more than 25 percent of fatal crashes occur at horizontal curves.

Three in four of those crashes happen in rural areas where pavement friction needs are greatest but are often least understood. Pavement friction is the one safety factor present in every crash on U.S. roadways and is the only leading indicator of pavement safety that can be measured, monitored, and managed by a DOT before a crash happens. Using CPFM, fatality and serious injury crashes could be reduced by 30 percent or more, while preventing or reducing the severity of up to 70 percent of wet-road, intersection, and roadway-departure crashes.[1]

FHWA has already done the foundational scientific work to prove the relationship between CPFM and crash rates that justifies the inclusion of friction data in states' biennial reports.[2] The strength of this relationship is why FHWA named pavement friction management using CPFM a Proven Safety Countermeasure.

Early state DOT adopters of pavement management using CPFM data have confirmed that it can yield both significant and more consistent safety performance improvements. Their work has yielded important additional information; namely, it has confirmed that "variations [in the relationship between pavement friction and crash risk] from state to state and even across locations within the same state…necessitate" CPFM-led pavement friction management.[3] This is important because, while state DOTs can use FHWA's work to date to describe broad potential safety benefits, to optimize safety benefits at the individual state level, state-specific friction data must inform state-specific pavement friction management programs.

FHWA, in partnership with the American Association of State Highway and Transportation Officials (AASHTO) and state DOTs, has supported important efforts to establish national standards for CPFM methodologies and enable consistent collection and interpretation of CPFM data across states.[4] What states need next is the incentive to use friction data to investigate appropriate state-level proactive, data-driven pavement friction performance management strategies, an incentive that lies that the heart of the language and intent of the NPMM.

Recommendation

As FHWA works to enhance the quality, usefulness, and clarity of the collected information to improve pavement conditions and roadway safety as part of this renewal, FHWA should evaluate the utility of adding CPFM as a new functional safety pavement condition metric into the biennial reporting framework and the NPMM, including weighing the potential benefits and costs of including friction data while leaving room for states to determine how best to manage the relationship between friction and crash risk on their networks. FHWA should also clarify whether it has the authority to add new metrics to the NPMM or if such a change would require

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[1] See FHWA Highway Safety Programs: Pavement Friction, Friction Management, and Continuous Pavement Friction Measurement, Accessed: September 2026

[2] See *Characterizing Road Safety Performance Using Pavement Friction* (FHWA SA-23-006), February 2023

[3] See *Development of a Pavement Friction Management Program* (FHWA-ICT-26-006), August 2026, and *Pavement Friction Management Program Demonstration* (VTRC 22-R14), October 2021

[4] See AASHTO TP 143 and *Pavement Friction for Road Safety: Primer on Friction Measurement and Management Methods* (FHWA-SA-23-007), February 2023

congressional action. A friction metric is precisely the kind of actionable, forward-looking metric that MAP-21's performance management framework was designed to produce, and adding such a metric would align the NPMM with the predictive, data-driven safety planning approach Congress intended.

Conclusion

CPFM is a proven technology that promotes proactive road safety, reduces crashes, and prevents injuries and death on U.S. roadways. This request for comment presents an opportunity for FHWA to build on its work proving the value of CPFM-led pavement friction management by encouraging the integration on friction data in states' performance measures to increase roadway safety nationwide.

We appreciate FHWA's leadership on pavement safety and welcome the opportunity to discuss these comments with agency staff.

Sincerely,

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