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Chair, House Committee on State Government and Elections
State House Room 101
Providence, Rhode Island 02903

RE: H 5730 – AN ACT RELATING TO MOTOR AND OTHER VEHICLES -- SIZE, WEIGHT,
AND LOAD LIMITS

Dear Committee Members:

I write as a small business owner with respect to H5730 and strongly support passage with a few additional modifications for consideration to enhance this bill.

The intention of this legislation is important in improving the permitting process for annual blanket permits issued through the RIDOT with respect to the current antiquated system. Essential proposing Annual/blanket permits VS the current Daily Permits.

The current RIDOT system for daily single trip permitting process is not flexible enough for industry because it is very cumbersome to maneuver, time consuming, costly, and not flexible enough to obtain a permit instantly. It does not allow for the the pace of modern business, or the ability for the small business to adjust their schedule as needed. It requires us to know well in advance where we are going, and when we are coming back. Predicting the future schedule of business activities is extremely dynamic and impossible to comply with everyday of the year.

Purposed blanket permits would not increase any travel on the roads. These vehicles are going whether or not it is a blanket permit or a daily permit. The road does not know the difference. It would simply give the small business the autonomy to operate in the manner that is best for the enterprise. Which is how our neighboring State of MA issues these permits.

While I am in support of the concept and proposed amendments, I would like to respectfully offer a few suggestive amendments for consideration that would make this bill more robust to other mobile equipment types facing similar problems with daily single trip permits.

Suggestions for consideration:

Suggestion #1 - Include a section to allow self-propelled cranes pursuant to RIGL § 31-1-9, Mobile equipment, to also utilize overweight oversize annual blanket permits. Amend the minimum overall length to allow for the more modern self-propelled cranes to obtain annual blanket permits. This would help to clarify the existing language which is not in step with existing regulation.

Suggestion #2 - With respect to curfews on travel time, restore travel time between the hours of 7:00 - 9:00 AM and between 3:00 -7:00 PM, Monday through Friday. These curfews are very restrictive for businesses who need to be on a worksite first thing in the morning, not to mention very archaic restrictions. This adds hidden costs to the business and is just not realistic.

Suggestion #3 - Modify the holiday travel work restrictions so as not to disrupt work for as many days. Again, these are out of touch with the modern world.

Modifying this bill to include these suggested amendments would make these DOT permits less burdensome and would allow these business sectors to utilize the overweight oversized annual blanket permits, allowing more flexibility in scheduling work, and cost saving compared to obtaining daily single trip permits.

I am in support of the concept of H5730 and willing to work with the makers of this bill to combine our interests to make this a more robust piece of legislation. Additionally, I would be happy to further discuss the points raised in this letter at your convenience.

I have included a few additional slides, that help illustrate the issue. Please see the following page(s).

Thank you for your consideration of my testimony.

Sincerely,

Stephen J Kelly

Daily Permits

Self Propelled Crane



Blanket Permits

Dump Truck



* This above slide illustrates that dump trucks are allowed blanket permission, but cranes are not. Even though they are nearly identical in size and weight.

This regulation is published right now on RIDOT.gov, and is not followed by RIDOT. The RIGL and RIDOT's own regulations are not in-step.

1.4.21 Cranes – Own Power

- A. Prior to May 1, 1989 blanket nondivisible load permits will be issued for the movement of cranes without restricting movement other than requiring cranes to abide by posted bridge limits.
- B. As of May 1, 1989, annual blanket permits will be available for intrastate movement of cranes that do not exceed the following dimensions and/or weights:
 - 1. 12' width
 - 2. 13'6" height
 - 3. 95' length
 - 4. 130,000 weight
- C. The blanket permits are restricted to a designated network that will be established by the Department of Transportation and disseminated to the trucking industry.
- D. As of May 1, 1989, all cranes that exceed the above weight and/or dimensions are required to obtain trip permits.

Having a manual system in place, leave too much room for human error and is too labor intensive for both RIDOT and the small business.

- Glitches: Sometimes you request a permit and the selected date glitches. It thinks it is a Holiday for some reason, and bounces your permit.
- Other times, you plan your whole route, type it all out, submit it, only to get a random error... See attached image. Very frustrating after you go through all the work of typing a permit. You then need to start the permitting process all over again.

