

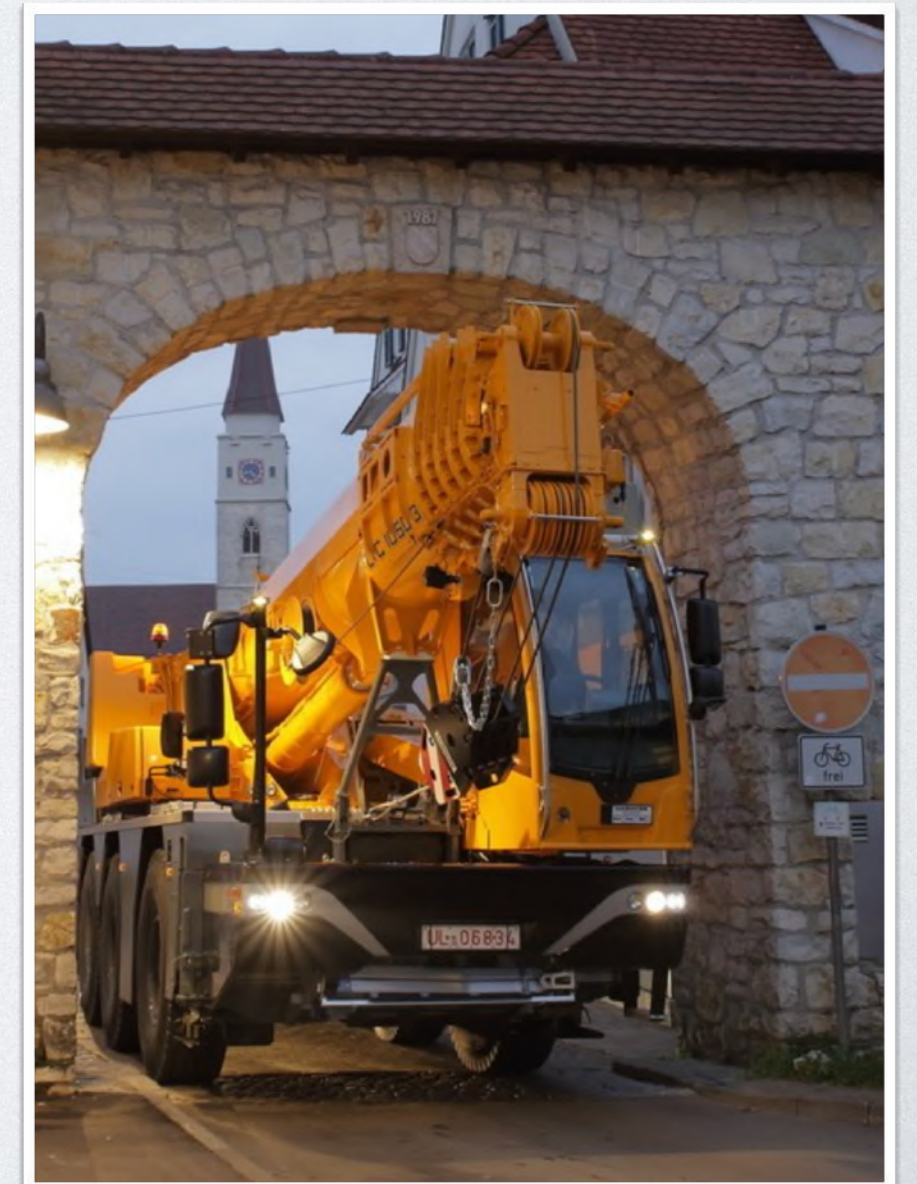
RIDOT SINGLE TRIP PERMITTING

AN ADMINISTRATIVE & FISCAL BURDEN TO SMALL BUSINESS



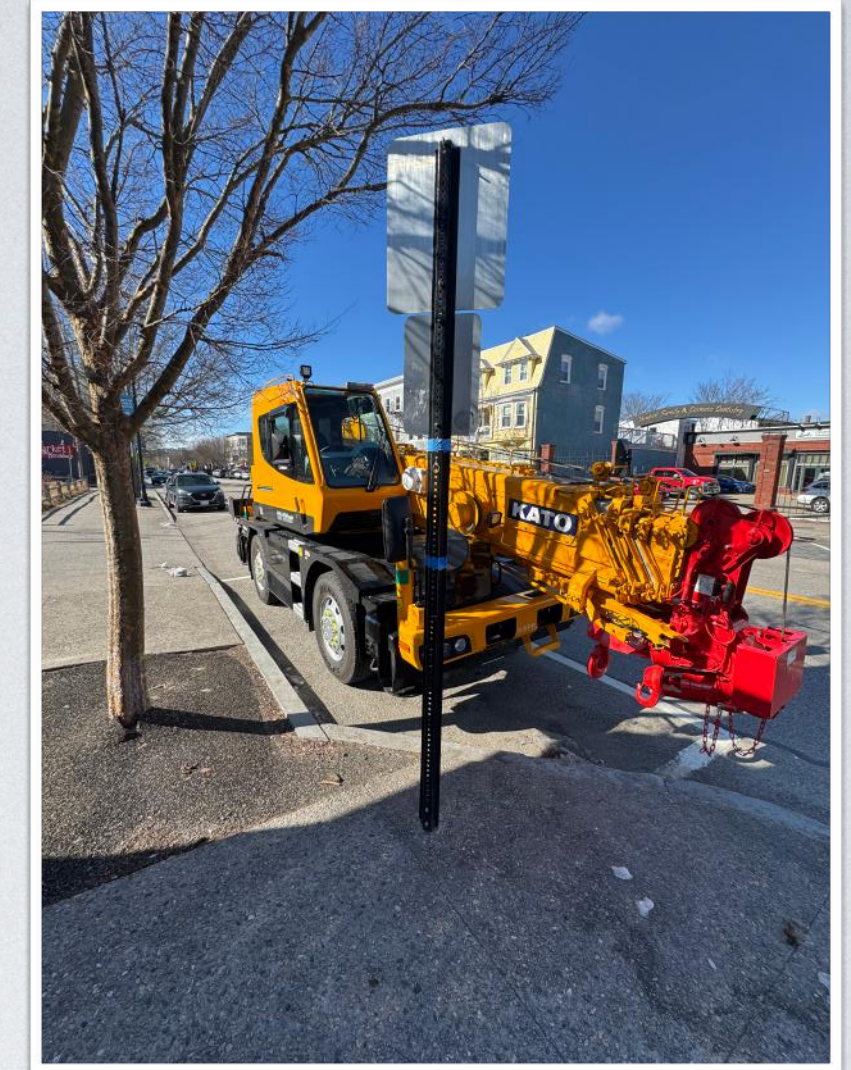
TAXI CRANE

- “Taxi Crane” is a term used to refer to mobile cranes that setup / breakdown quickly. They are configured to travel to the job site themselves, without the assistance of transportation equipment (including counterweight and jibs.) This is an extremely efficient way to complete minor projects. The taxi crane can complete numerous jobs in one day. With their compact design, they can easily navigate a job site and quickly perform lifts. Then be back on the road to the next job.
- Cranes that would generally fall into this category are 2, 3, and 4 axle machines that are $< 120,000$ LBS.
- Modern cranes are generally compact, this is due to having the weight centralized for crane operations, and maneuverability. While they typically have less axles than an equally heavy tractor trailer, their tires are much larger; which aids in the spreading out of the weight onto the road.



TAXI CRANE CONT.

- These Taxi Cranes need to be able to respond to jobs quickly, as the industries they support can often have urgent needs. For example: Generator goes out at a Hospital, HVAC system goes out at a restaurant, sinking boat at a marina, etc.
- Cranes act primarily as sub-contractors. Meaning other trades are depending on them getting there. So coordination is much more involved to begin with. You often need a crane, a 3rd party truck to unload, a contractor to work for, and a decent weather day all to align.
- Taxi cranes are called for multiple jobs a day, on short notice, and with ever-changing schedules. Pulling permits ahead of time for jobs you're not sure when they will happen is not feasible.
- You also are often unsure when a job will end. Sometimes a 2 day job, turns into 4 or 5 days. So you have to pull a permit again, and pay again, just to drive down a road you have already been approved to travel.
- The amount of time on the job site is not proportionate to the amount of time submitting permits. Often, the crane is on site for 2-3 hours known as "*a quick pick*". You easily spend 1-2 hours writing your permit. IF, you even have enough lead time to request the permit.
- What this DOES NOT include, is the VERY heavy cranes (OVER 130,000LBS), or the very wide cranes. That equipment is more common to know when it needs to be mobilized, and can be planned / routed differently than what we are asking for here.



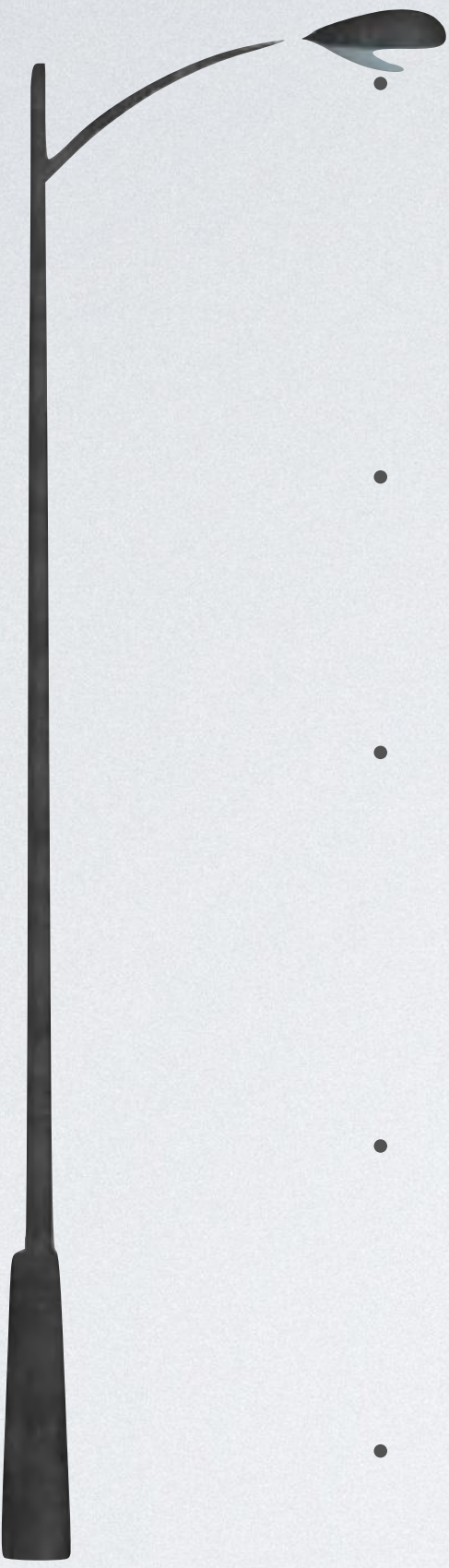
CURRENT ISSUE(S) WITH RIDOT PERMITTING FOR SELF-PROPELLED CRANES.

- Current RIGL will not allow self-propelled cranes to travel without a daily permit. While most other special vehicles are allowed an Annual / Blanket permit.
- This requires industry to know well in-advance where and when we are going somewhere, and no ability for schedule changes, or deviation from approved route.
- RIGL's out of step with current RIDOT Regulations. As posted on RIDOT website. ———>
- Business has no ability to operate it's own schedule.
- You need to know where you are going, well in advance. Submit turn by turn directions. Wait for approval/rejection. Revise route if needed. Resubmit. Await approval.
- Single trip permits require reoccurring/daily \$40 permit vs annual blanket fee \$400.
- The passage of this Bill would not increase crane traffic on the road. The cranes are on the road whether it is a daily permit or a blanket permit. The road knows no difference. We are simply asking to eliminate the paper work, and administrative burden.
- RIDOT has stated “auto-routing” software is coming. However, is unable to give a timeline. Industry needs immediate relief.

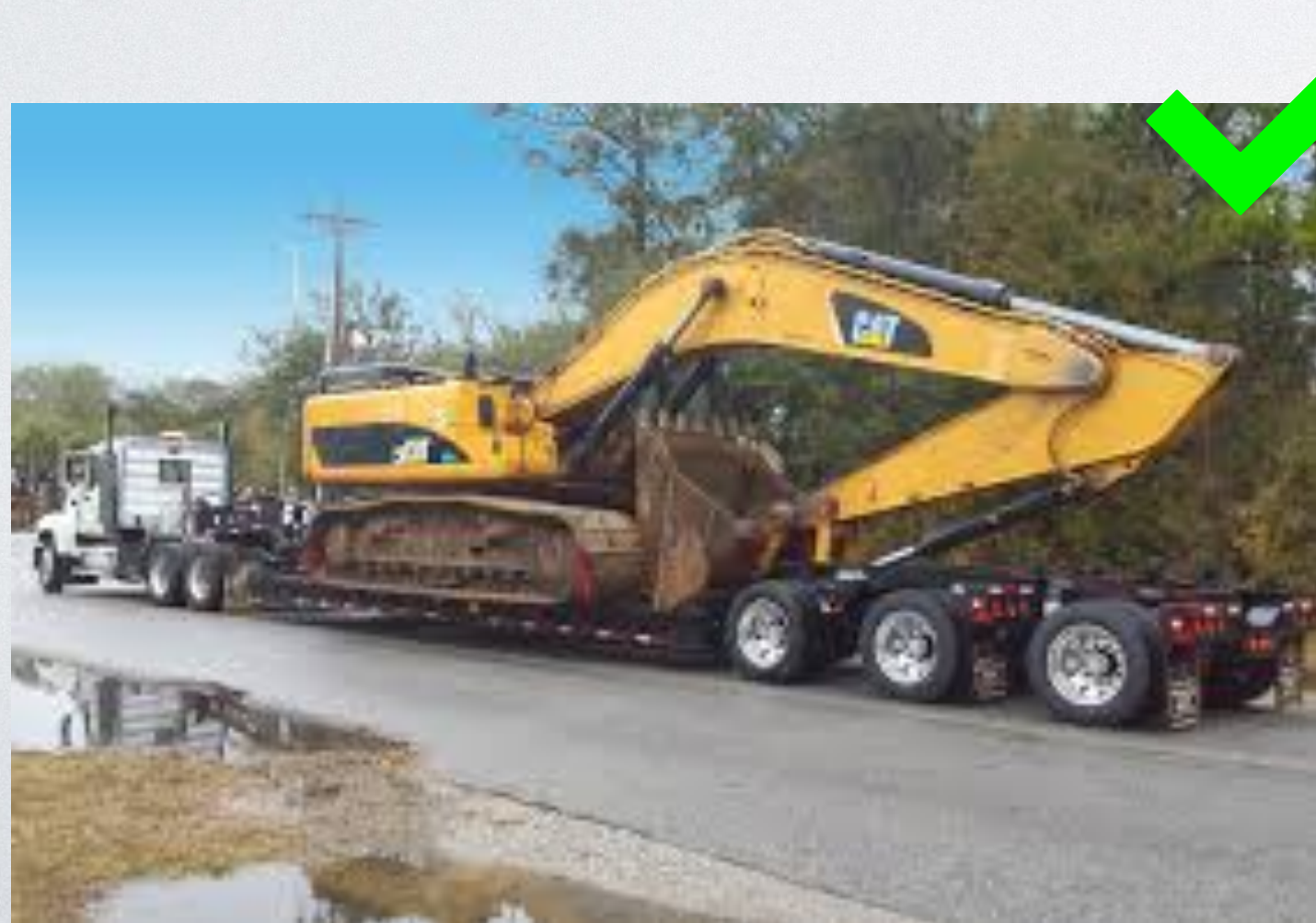
1.4.21 **Cranes** – Own Power

- 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.

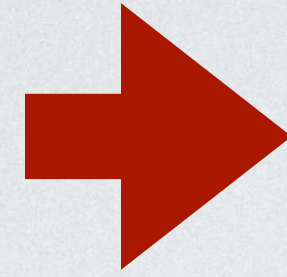
CURRENT ISSUE(S) WITH RIDOT PERMITTING FOR SELF-PROPELLED CRANES CONT.

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- Curfew: Cranes over 8'6" wide have a curfew of 7a-9a and 3p-7p. That is really restrictive to everyday human life. Both from a production standpoint on job sites, and family standpoint at the end of the day. Daylight and weather play heavily into this.
 - Holiday travel: Often, cranes are requested during the Holiday weekends. Example: Thanksgiving break for colleges, students are not in the buildings and maintenance teams like to swap out HVAC units.
 - Does RIDOT have the authority to route vehicles on roads not controlled by the State? Because MADOT will not route you once you are off of a State highway. It is an invasion of private sector trade information to share with the State where we are working daily.
 - In-short, self-propelled cranes are asking for blanket permits, annual fee, and curfew / holiday travel be reevaluated.
 - MA DOT = \$400 annual blanket permit for cranes. 130,000 GVW or less, no axle restrictions.
 - Requiring certain cranes to have an escort vehicle with the only reason being that the crane is heavy. This is ineffective; cars either cut between escort and crane or the escort gets cut off at stop lights and signs. It puts more vehicles on the road, increases emissions, and costs employer more money. You do not see dump trucks being escorted.

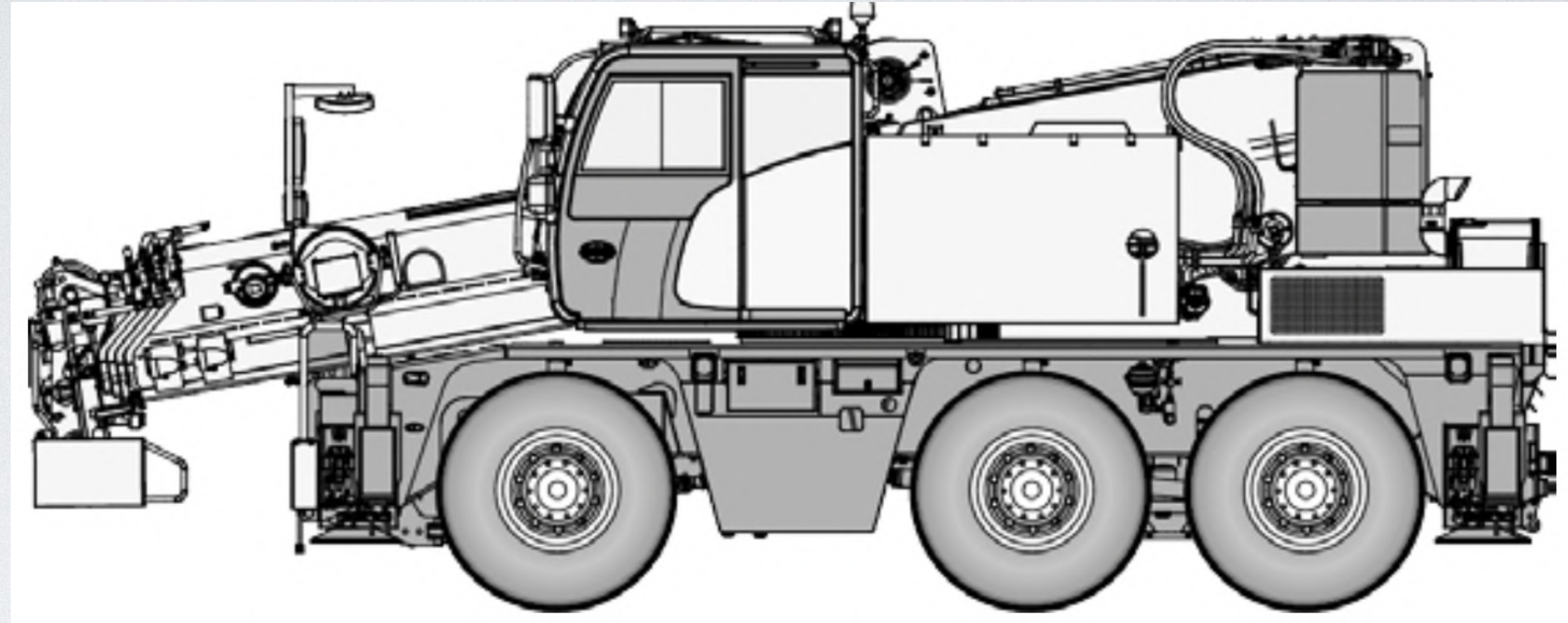
VEHICLES THAT HAVE ANNUAL/ BLANKET PERMITS



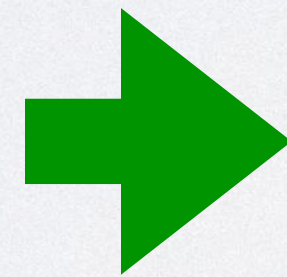
Daily Permits



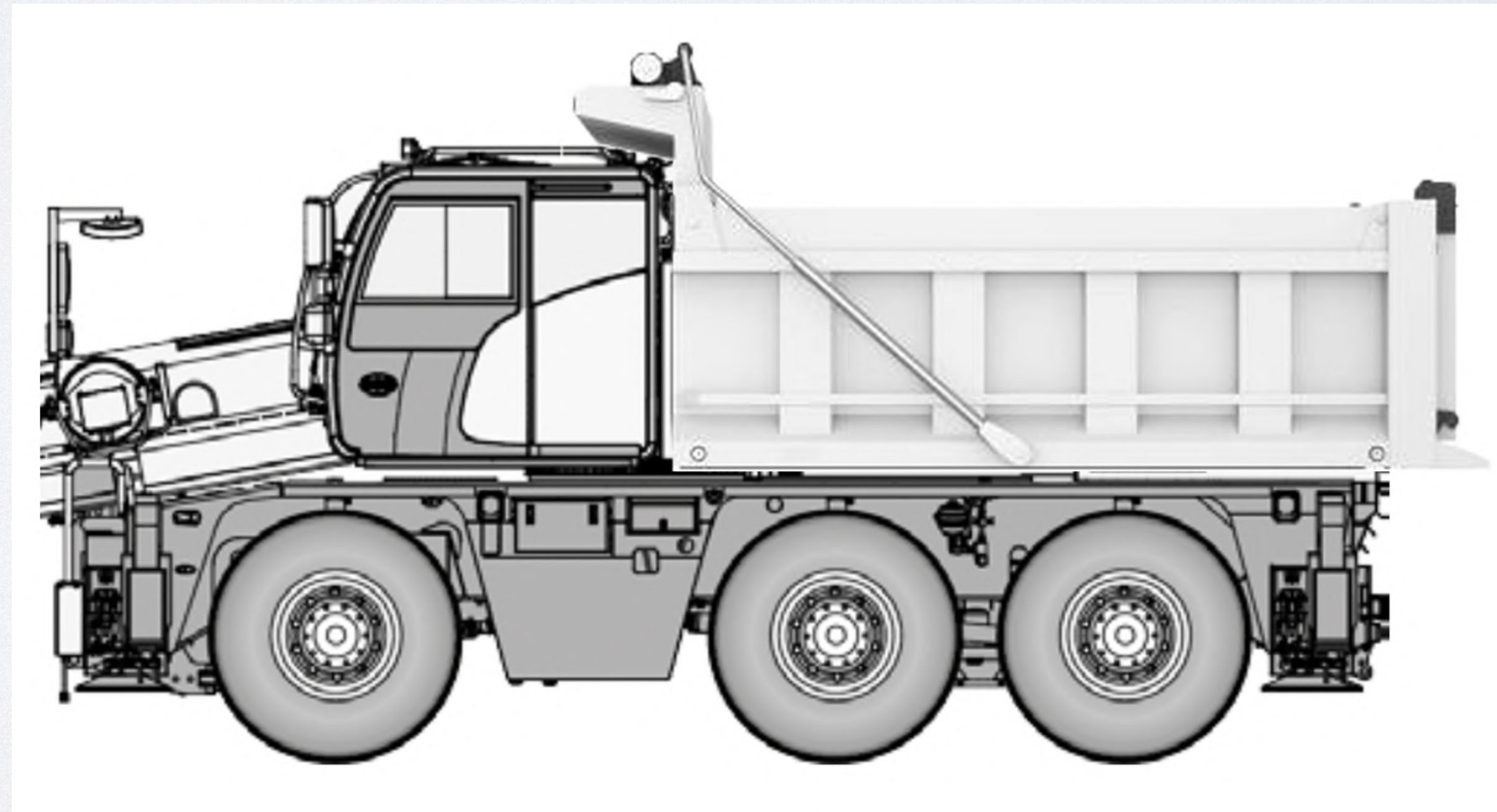
Crane: Considered non-divisible,
and does not meet RIGL requirements for length
(generally too short), and axle load.



Blanket Permits



Dump Truck: Considered a divisible load
(it can dump the dirt out and become lighter.)



Which does not make any sense...

Is the DOT saying divisible load trucks can be trusted to self route, but non-divisible loads cannot?

EXEMPTED LOADS

EXEMPT from any permitting per RIGL



Trash vehicles, that drive very predicable routes.
No permit required.
These vehicles are often extremely heavy.



Heavy duty (rotator) recovery vehicles.
No permit is required, due to not knowing where
and when it will be needed. Cranes often respond in
a similar manner to these vehicles.

NOTES FROM MY EXPERIENCE WITH PERMITTING

- Sam H. from RIDOT has been very helpful and flexible in working with industry on complex routes with tons of stops. I worry what happens when Sam gets promoted, leaves, retires, etc. Is the next person to fill that role going to be as helpful?
- Different people review the permits, so there is large margin for human error. Sometimes a route gets approved, then someone else reviews it another time and it is rejected.
- However, with extreme attention to detail and planning, we are still finding ourselves “off route,” with no time to correct the route because the route change came in when we were already *out in the field*, or after normal business hours. This is costing my business thousands of dollars of lost revenue, or I risk taking the job and incurring major fines and violations.
- The daily permit is \$40, the fine for not having the \$40 permit could be \$20,000!
- The final route often changes based on delivery schedules, added jobs, rescheduled jobs, weather, attendance, and a host of other issues. Also consider, the only way these routes are being altered is if a person is in the office the day prior and has time to submit and monitor. If these changes are coming in while I am away from a computer, this is impossible.

CONTINUED...

- Example: A customer calls you and would like to hire you to offload a truck. However, it is unknown exactly when that truck is going to arrive. It is Friday, and they say they think the truck will be here on Saturday or Monday. Global shipping has been a complete nightmare the past several years. Freight is rarely on time. This load ended up showing up on Wednesday. But now the crane is in a different location, so the route needed to travel to said truck is different. Permit is invalid.
- If the route is good one day, why is not good for the next week, month, 6 months?
- Example: Now say you are out on a job and a call comes in. Someone nearby needs a crane lift... How can I possibly get there with a permit? The day would be over before you could get this permit. This is the nature of the “taxi crane” business.

CONTINUED...

- Permits get rejected for silly clerical errors (see attached image). In the red, is the route I wrote and at the bottom is the “revised” route... They understand where we are going. “L onto Garden St” is the same as “L onto Garden St (S).” That is punitive, a waste of time, and not a good use of tax payer dollars.
- DOT does not alert you when a permit has been approved / rejected. You are required to continually log into the system and check.

Point of Destination	31 russo rd, Portsmouth, RI, 02871
Route Description	L on Russo Rd -> R on to 114N -> 24N -> 195W -> 95N -> exit 41A -> Pine Street -> 461 Main Street. Return: S on Main St -> L onto Garden St -> R onto Cedar St -> 95S -> 195E -> 24S -> 114S -> L on Russo Rd.

Provisional Information

DOT Escort Required?	Pending DOT Review
Number of Civilian Escort Vehicles	Pending DOT Review
Number of Police Escort Vehicles	Pending DOT Review
Provisional Comment	

Expiration Date: **01-14-2023**

Statutory Fee: **\$40.00**

RII Fee: **\$4.50**

Total Cost: **\$44.50**

CLOSE

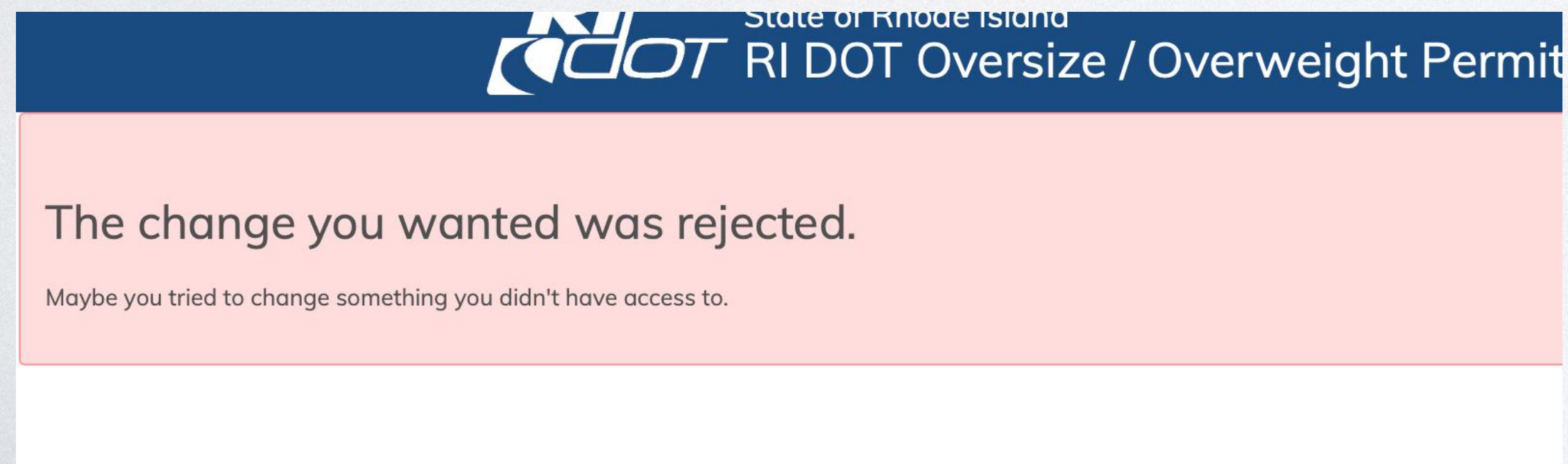
EDIT

Messages

REJECETD. Route is missing multiple turns, details, and exit number. Suggested route: L on Russo Rd(W) -> RI-114(N) -> RI-24(N)*NO TRAVEL IN ANY BREAKDOWN LANES* -> MA -> I-195(W) -> I-95(N) -> Exit 41A -> L on Pine St(N) -> R on Main St(E) -> 461 Main St -> Return: Main St(W) -> L on Garden St(S) -> R on Cedar St(W) -> I-95(S) -> Exit 36A -> I-195(E) -> MA -> RI-24(S)*NO TRAVEL IN ANY BREAKDOWN LANES* -> RI-114(S) -> L on Russon Rd(E) DOT OSOW Admin, 2023-01-09, 8:49

CONTINUED...

- 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.



NON DIVISIBLE LOADS VS DIVISIBLE LOADS



- DOT categorizes commercial vehicle into two general categories: Divisible and Non-Divisible
- Cranes are generally considered Non-Divisible loads. However they really are their own thing.
- Non-Divisible loads are typically large freight items being hauled down the road, and also cranes. Freight would be like a modular home, large boat, or other item that could not be made smaller or lighter. Blanket permits are available for these vehicles in RI, however you need to be 55-80' long, less than 12'4" wide, less than 13' 6" tall, and max weight of 130,000 Lbs (25,000/axle.) Most everyday (taxi) cranes would easily make those restrictions, EXCEPT not being 55' long, and the crane would have higher axle loads, but as mentioned before, their larger tires help mitigate that.
- So you could be 79' long, 12' 3" wide, 13'5" tall, and 129,999 lbs and drive anywhere you want on a blanket permit. But a crane that is 28' long, 8'4" wide, 10'7" tall, and 67,000 Lbs needs to pull permits daily! *Queue twilight zone music.*

DIVISIBLE LOADS

- Divisible loads are essentially vehicles that can reduce their weight, easily and quickly, to conform with load limits. For example, an empty dump truck or cement truck is not exceeding load limits when they are not hauling material. However, once they take on rocks, dirt, concrete, etc they EXCEED these axle load limits, then requiring permitting.
- Divisible load vehicles ARE allowed annual blanket permits.
- A lot of cranes have the same profile as most cement mixers, trash, and dump trucks. Yet they let the Divisible Loads run on annual permits and the cranes cannot. It makes absolutely no sense to allow a dump truck traveling at the same weights to have annual permits when the crane cannot.
- Example: A 3 axle 75,000 GVW dump truck loads gravel at a facility and drives to a job site. At the job site, it offloads gravel and hauls un-needed soil back to the original facility. A 3 axle 75,000 GVW crane leaves its facility and drives to the same site, completes a job and drives back. DIFFERENCE being, the dump truck did all this with a permit it pulls once a year; The crane had to have 24 hours notice and spend a considerable amount of time pulling a permit, to complete the same work. The road traveled on is no more or less impacted by either vehicle, with either permit designation.



SOLUTIONS

- Self-Propelled cranes are unique and need to be treated as such. They are specialized mobile equipment, with a unique design for lifting operations. Trucks are designed for hauling, cranes are designed for lifting. That is why they do not fit into the “cookie cutter” axle spacing of trucks per the non-divisible permits. They are only on the road when traveling to and from a site of construction. An appropriate annual permit could easily be created. We’ve been open to discussions to allow this, with certain restrictions in place. Cranes would be willing to pay a premium for this.
- RIDOT letter in opposition to this, references the tracking of these vehicles, well why not track ALL the vehicles then? (the ones with current annual permits) Self Propelled cranes would be willing to self report routes on a monthly basis on where we have been, or use GPS recording software. This would give DOT data to track. Also there are many instances of permits that get pulled, and the route is never travelled due to schedule changes. So the data is not accurate either way.
- RIDOT could simply provide each company applying for an annual permit with a “crane study” which would essentially be a map of bridges / overpasses you cannot cross. The responsibility is then on the company to not over these “no-go” zones. The cost of this crane study could be absorbed with a more expensive blanket fee.
- Work-around: There is not a RIGL or regulation stating the duration of a “single trip” permit. If DOT is dug in on the idea I need single trips still, why not let me pull a permit and just not let it expire. I could essentially cover a majority of my routes with about a dozen “single trip permits.”
- Until such time as “auto routing” is adopted, RIGL’s need to be amended or RIDOT issues a temporary memorandum of agreement to allow crane permitting. OR just follow their own Regulations.