August 18, 2025

Mr. Gregory D. Cote
Acting General Counsel
U.S. Department of Transportation
1200 New Jersey Avenue, SE
Washington, DC 20590

Subject: Comments on Request for Information: Advancing a Surface Transportation Proposal That Focuses on America's Most Fundamental Infrastructure Needs (Docket No. DOT–OST–2025–0468)

Dear Mr. Cote:

ITE—A Community of Transportation Professionals is grateful for the opportunity to provide comments on the U.S. Department of Transportation's (USDOT) Request for Information (RFI) on Advancing a Surface Transportation Proposal That Focuses on America's Most Fundamental Infrastructure Needs, published in the *Federal Register* on July 21, 2025.

Founded in 1930, ITE is an international membership association of transportation professionals who work to improve safety and mobility for all transportation system users and help build smart and livable communities. Through its products and services, ITE promotes professional development and career advancement for its members, supports and encourages education, identifies necessary research, develops technical resources including standards and recommended practices, develops public awareness programs, and serves as a conduit for the exchange of professional information. Through meetings, seminars, publications, and a network of more than 18,000 members working in 78 countries, ITE connects members to a world of ideas, people, and resources.

As USDOT develops its policy position for the next surface transportation authorization, ITE believes the framework must address today's most pressing transportation challenges while positioning the system to take advantage of future opportunities. ITE supports USDOT's focus on enhancing transportation safety, accelerating project delivery, increasing opportunities through investments, and strengthening partnerships.

Our recommendations focus on three areas:

1) Enhancing Transportation Safety
2) Increasing Opportunities through Investments
3) Strengthening Partnerships

These areas reflect ITE's commitment to creating a safer, more efficient, and more collaborative transportation system that serves all users and communities effectively. The sections below summarize ITE's specific recommendations.

1) Enhancing Transportation Safety

ITE believes that zero fatalities on U.S. roadways is achievable, and safety must be treated as a core value embedded in all Federal programs. We recommend that USDOT should:

- **Use the Safe System Approach (SSA) Framework:** Ensure all federally funded transportation safety programs and projects to integrate SSA principles—redundancy, human-centered design, and shared responsibility—into planning, project selection, and funding criteria.
- **Establish a National Center for Advancing Transportation Safety:** Authorize and fund a multidisciplinary center to serve as a centralized hub for research, technical assistance, and practitioner training across planning, design, construction, maintenance, and operations.
- **Expand the Use of Road Safety Audits (RSAs):** Provide dedicated funding for RSAs on all federally funded projects and high-risk corridors. Require FHWA to update guidance, support workforce certification, and scale RSA implementation nationwide.
- **Create a Dedicated Local Roads Safety Grant Program:** Provide direct federal funding to cities, counties, tribal governments, and regional agencies for systemic safety improvements on locally owned roads, with simplified application and reporting requirements to improve access for smaller jurisdictions.

2) Increasing Opportunities through Investments

Increasing opportunities through investment requires sustained innovation—in technology (e.g., real-time data, automation, vehicle-to-everything [V2X] communication), in how we plan, build, and operate transportation infrastructure and in funding and financing strategies. We recommend that USDOT:

- **Define and Fund a National Transportation Innovation Strategy:** Establish a sustained Innovation Deployment Program supporting pilots, demonstrations, and technology scaling, particularly for local agencies.
- **Reduce Barriers to Innovation:** Streamline the approval processes for testing and deploying new technologies, designs, and delivery models, including cross-sector data-sharing partnerships.
- **Invest in Transportation Digital Infrastructure:** Define digital infrastructure as a core element of transportation policy. Fund systems that enable real-time information exchange among vehicles, infrastructure, and management systems to support connected, automated, and data-driven decision-making.
- **Develop a National Connected Vehicle (V2X) Deployment Plan:** Establish clear federal leadership, milestones, and a collaborative framework for widespread V2X adoption, aligning investments and spectrum-use policy.
- **Support the National Operations Center of Excellence and Robust Research Programs:** Maintain funding for proven national centers and research programs that provide practitioners with tools, data, and knowledge to improve system performance and accelerate project delivery.

3) Strengthening Partnerships

Effective transportation policy relies on collaboration across all levels of government and sectors. To elevate the role of local agencies—who own and operate much of the roadway network, manage land use, and address a significant proportion of pedestrian and bicyclist fatalities—the USDOT should:

- **Support Capacity Building and Technical Assistance:** Provide dedicated funding to help local agencies implement SSA, resilience, and digital infrastructure initiatives, through training and technical support programs.
- **Elevate Local Agency Representation:** Encourage greater local participation in statewide and metropolitan planning processes and establish formal mechanisms for input on federal initiatives.
- **Provide Direct Funding Opportunities:** Create or expand federal grant programs that allow suballocation to local governments—including rural and small urban communities—with reduced administrative barriers.
- **Align Transportation Investments with Land Use and Economic Development:** Incentivize projects that integrate transportation planning with housing, growth management, and community development to deliver broader societal benefits.

ITE urges USDOT to build on the success of current programs while advancing transformative improvements in safety, innovation, and partnerships. By embedding the Safe System Approach, investing in digital and physical infrastructure, and empowering local agencies, federal surface transportation policy can deliver safer and more efficient outcomes for roadway users and benefit all communities.

We appreciate the opportunity to contribute to these recommendations and stand ready to collaborate with USDOT and other stakeholders to advance these shared priorities. If you have any questions about these comments or recommendations, please contact Matthew Hardy, Ph.D., Deputy Executive Director and Chief Technical Officer, at (703) 868-7154 or mhardy@ite.org.

Sincerely,



Stephen R. Kuciemba
ITE Executive Director & CEO