Mr. Craig Mr. Schulz  
Pexco, LLC  
3110 70th Ave East  
Tacoma, WA 98424

Dear Mr. Schulz:

This letter is in response to your May 11, 2018 request for the Federal Highway Administration (FHWA) to review a roadside safety device, hardware, or system for eligibility for reimbursement under the Federal-aid highway program. This FHWA letter of eligibility is assigned FHWA control number WZ-361 and is valid until a subsequent letter is issued by FHWA that expressly references this device.

Decision

The following devices are eligible within the length-of-need, with details provided in the form which is attached as an integral part of this letter:

- Interstate Grade Curb

Scope of this Letter

To be found eligible for Federal-aid funding, new roadside safety devices should meet the crash test and evaluation criteria contained in the American Association of State Highway and Transportation Officials’ (AASHTO) Manual for Assessing Safety Hardware (MASH). However, the FHWA, the Department of Transportation, and the United States Government do not regulate the manufacture of roadside safety devices. Eligibility for reimbursement under the Federal-aid highway program does not establish approval, certification or endorsement of the device for any particular purpose or use.

This letter is not a determination by the FHWA, the Department of Transportation, or the United States Government that a vehicle crash involving the device will result in any particular outcome, nor is it a guarantee of the in-service performance of this device. Proper manufacturing, installation, and maintenance are required in order for this device to function as tested.

This finding of eligibility is limited to the crashworthiness of the system and does not cover other structural features, nor conformity with the Manual on Uniform Traffic Control Devices.
Eligibility for Reimbursement

Based solely on a review of crash test results and certifications submitted by the manufacturer, and the crash test laboratory, FHWA agrees that the device described herein meets the crash test and evaluation criteria of the American Association of State Highway and Transportation Officials’ Manual for Assessing Safety Hardware (MASH). Therefore, the device is eligible for reimbursement under the Federal-aid highway program if installed under the range of tested conditions.

Name of system: Interstate Grade Curb
Type of system: Work Zone
Test Level: MASH Test Level 3
Testing conducted by: Texas A & M Transportation Institute
Date of request: May 11, 2018

FHWA concurs with the recommendation of the accredited crash testing laboratory as stated within the attached form.

Full Description of the Eligible Device

The device and supporting documentation, including reports of the crash tests or other testing done, videos of any crash testing, and/or drawings of the device, are described in the attached form.

Notice

This eligibility letter is issued for the subject device as tested. Modifications made to the device are not covered by this letter. Any modifications to this device should be submitted to the user (i.e. state DOT) as per their requirements.

You are expected to supply potential users with sufficient information on design, installation and maintenance requirements to ensure proper performance.

You are expected to certify to potential users that the hardware furnished has the same chemistry, mechanical properties, and geometry as that submitted for review, and that it will meet the test and evaluation criteria of AASHTO’s MASH.

Issuance of this letter does not convey property rights of any sort or any exclusive privilege. This letter is based on the premise that information and reports submitted by you are accurate and correct. We reserve the right to modify or revoke this letter if: (1) there are any inaccuracies in the information submitted in support of your request for this letter, (2) the qualification testing was flawed, (3) in-service performance or other information reveals safety problems, (4) the system is significantly different from the version that was crash tested, or (5) any other information indicates that the letter was issued in error or otherwise does not reflect full and complete information about the crashworthiness of the system.
Standard Provisions

- To prevent misunderstanding by others, this letter of eligibility designated as FHWA control number WZ-361 shall not be reproduced except in full. This letter and the test documentation upon which it is based are public information. All such letters and documentation may be reviewed upon request.

- This letter shall not be construed as authorization or consent by the FHWA to use, manufacture, or sell any patented system for which the applicant is not the patent holder.

- This FHWA eligibility letter is not an expression of any Agency view, position, or determination of validity, scope, or ownership of any intellectual property rights to a specific device or design. Further, this letter does not impute any distribution or licensing rights to the requester. This FHWA eligibility letter determination is made based solely on the crash-testing information submitted by the requester. The FHWA reserves the right to review and revoke an earlier eligibility determination after receipt of subsequent information related to crash testing.

Sincerely,

[Signature]

Michael Griffith
Director, Office of Safety Technologies
Office of Safety

Enclosures
Request for Federal Aid Reimbursement Eligibility of Highway Safety Hardware

Date of Request: May 11, 2018
Name: Craig Schulz
Company: Pexco, LLC
Address: 3110 70th Ave East
          Tacoma, WA 98424
Country: USA
To: Michael S. Griffith, Director
    FHWA, Office of Safety Technologies

I request the following devices be considered eligible for reimbursement under the Federal-aid highway program.

**Device & Testing Criterion** - Enter from right to left starting with Test Level

<table>
<thead>
<tr>
<th>System Type</th>
<th>Submission Type</th>
<th>Device Name / Variant</th>
<th>Testing Criterion</th>
<th>Test Level</th>
</tr>
</thead>
<tbody>
<tr>
<td>'WZ': Crash Worthy Work Zone Traffic Control Devices</td>
<td>Physical Crash Testing</td>
<td>Interstate Grade Curb</td>
<td>AASHTO MASH</td>
<td>TL3</td>
</tr>
<tr>
<td></td>
<td>Engineering Analysis</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

By submitting this request for review and evaluation by the Federal Highway Administration, I certify that the product(s) was (were) tested in conformity with the AASHTO Manual for Assessing Safety Hardware and that the evaluation results meet the appropriate evaluation criteria in the MASH.

**Individual or Organization responsible for the product:**

<table>
<thead>
<tr>
<th>Contact Name:</th>
<th>Craig Schulz</th>
<th>Same as Submitter ☑</th>
</tr>
</thead>
<tbody>
<tr>
<td>Company Name:</td>
<td>Pexco, LLC</td>
<td>Same as Submitter ☑</td>
</tr>
</tbody>
</table>
| Address:      | 3110 70th Ave East
                Tacoma, WA 98424 | Same as Submitter ☑ |
| Country:      | USA          | Same as Submitter ☑ |

Enter below all disclosures of financial interests as required by the FHWA 'Federal-Aid Reimbursement Eligibility Process for Safety Hardware Devices' document.

Pexco, LLC is a manufacturer of plastic roadway devices used both in the work-zone and also in permanent applications around the world. The Interstate Grade (IG) Curb System was developed by the engineering department of Pexco, it is a design owned by Pexco with no patents issued or applied for. Pexco sponsored testing of the IG Curb to MASH TL3 at Texas A&M Transportation Institute (TTI) an independent, accredited ISO 17025 testing laboratory and facility. The IG Curb was previously tested at TTI in 2002 and was issued WZ-193 and a later amendment, under NCHRP 350 test procedures. This product has since provided years of safe applications and use around the world. The full scale crash testing was completed by TTI in accordance with MASH 3-90 and 3-91, with both the 1100C and 2270P vehicles in the Fall of 2016.
PRODUCT DESCRIPTION

The Interstate Grade Curb System is a 38" long x 8" wide by 2.0" high thermoplastic molded plastic longitudinal channelizing device. The Interstate Grade Curb is intended to be used as a continuous application developed for high speed applications were a continuous conceived barrier to entry is wanted. The Interstate curb system is designed to nest under the previous curb, with the use of a end cap to finish a run. The Interstate Grade Curb is designed to be used with the FG300 Flexible Channelizing Tubular Markers to enhance the delineation of the system creating a picket fence look when deployed in the field.

CRASH TESTING

By signature below, the Engineer affiliated with the testing laboratory, agrees in support of this submission that all of the critical and relevant crash tests for this device listed above were conducted to meet the MASH test criteria. The Engineer has determined that no other crash tests are necessary to determine the device meets the MASH criteria.

<table>
<thead>
<tr>
<th>Engineer Name:</th>
<th>Dusty Arrington</th>
</tr>
</thead>
<tbody>
<tr>
<td>Engineer Signature:</td>
<td>Dusty Arrington</td>
</tr>
<tr>
<td>Address:</td>
<td>2427 Earl Rudder Freeway, College Station, TX</td>
</tr>
<tr>
<td>Country:</td>
<td>USA</td>
</tr>
<tr>
<td>Same as Submitter</td>
<td>Yes</td>
</tr>
</tbody>
</table>

A brief description of each crash test and its result:

<table>
<thead>
<tr>
<th>Required Test Number</th>
<th>Narrative Description</th>
<th>Evaluation Results</th>
</tr>
</thead>
<tbody>
<tr>
<td>3-90 &amp; 3-91</td>
<td>3-90 involves the use of 1100C small car. 3-91 involves the use of 2270P light truck. Both vehicles impacted the longitudinal channelizer at a nominal speed of 62 mi/h at the critical angles (CIA) between 0-25 degrees as determined to maximize the risk of rollover and/or excessive vehicle deceleration. 36” Flexible delineator posts were installed in the system and subjected to all testing, there was no loss of delineators in testing.</td>
<td>PASS</td>
</tr>
</tbody>
</table>

Full Scale Crash Testing was done in compliance with MASH by the following accredited crash test laboratory (cite the laboratory’s accreditation status as noted in the crash test reports):
ATTACHMENTS

Attach to this form:
1) Additional disclosures of related financial interest as indicated above.
2) A copy of the full test report, video, and a Test Data Summary Sheet for each test conducted in support of this request.
3) A drawing or drawings of the device(s) that conform to the Task Force-13 Drawing Specifications [Hardware Guide Drawing Standards]. For proprietary products, a single isometric line drawing is usually acceptable to illustrate the product, with detailed specifications, intended use, and contact information provided on the reverse. Additional drawings (not in TF-13 format) showing details that are relevant to understanding the dimensions and performance of the device should also be submitted to facilitate our review.

FHWA Official Business Only:

<table>
<thead>
<tr>
<th>Eligibility Letter</th>
<th>Number</th>
<th>Date</th>
<th>Key Words</th>
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</table>
General Information
Test Agency: Texas A&M Transportation Institute (TTI)
Test Standard Test No: MASH Test 3-90
TTI Test No: 690900-DTC19-5 through 8
Test Date: 2016-10-06
Test Article
Type: Channelizer
Name: Interstate Grade Curb System
Installation Length: 125 ft-8 inches and 31 ft-8 inches
Material or Key Elements: 30 sections of FG300 Curb with 4 coil anchors with FG366 Model EFX Post and two 3-inch x 9-inch AR1000 Wraps

Soil Type and Condition: Concrete Surface, Dry

Impact Conditions
Speed: 62 mi/h
Angle: 25, 15, 0 degrees
Plus lane change

Kinetic Energy
Occupant Risk Values: Data not recorded
Post-Impact Trajectory: N.A

Vehicle Stability
Vehicle Snagging: No
Vehicle Pocketing: No
Vehicle Roll: No

Vehicle Damage
VDS: 12FD0
CDC: 12FDEWO
Max. Exterior Deformation: None
OCDI: LF0000000
Maximum Occupant Compartment Deformation: None

Damage to vehicle after Test Nos. 690900-DTC19-5 through 8.

Figure 6.11. Summary of Results for MASH Test 3-90 on Interstate Grade Curb System.
Figure 5.11. Summary of Results for MASH Test 3-91 on the Interstate Grade Curb System.
NOTES:

SINGLE CURB SECTION SHOWN WITH FG336 MODEL EFX POST AND 2 3"x9" AR'M00 WRAPS

OPTIONAL REFLECTIVE ROAD STUDS APPLIED IN 6 PLACES

4 ANCHOR BOLTS PER INTERSTATE GRADE CURB SECTION
2 ANCHOR BOLTS PER INTERSTATE GRADE END CAP BASE

END CAP BASE
INTERSTATE GRADE CURB

AS INSTALLED

This drawing and other Davidson products are available in AutoCAD format with simple drag and drop features to transfer product information directly into design drawings. Davidson product CD works with all software packages and the CAD library allows for fluid transfer of files across all OS platforms. To register for your free copy, please contact your Davidson Sales Representative or email hwysales@iltron.com.

Figure 2.1. Details of the Interstate Grade Curb System with 36-inch Tall Model EFX Post.