

Dear AASHTO and DOT Secretaries:

As you may or may not be aware, [AASHTO M180-23](#) introduced many changes that impact the manufacture, installation and chemical/physical properties of most highway guardrail components.

I am writing to address the recent changes made to AASHTO M180, specifically highlighting the following challenges in version 23:

1. **Lack of a Reasonable Implementation Schedule.** Currently, an implementation plan does not exist. From State DOT to State DOT, people are interpreting the changes differently. Right now, the revised AASHTO M180-23 is considered a “live” document. Some DOT-specific personnel that we have spoken with believe they are already receiving material that meets the new AASHTO M180-23. The reality is they are not because manufacturers haven’t been given time to gear up for these changes. We request a more reasonable implementation timeline to ensure smooth transition and compliance.

Consider that all parties throughout the supply chain from material producers, manufacturers, installers and DOTs—essentially all stakeholders—work with stockpiled material of some form or another. It is critical to allow a reasonable time frame for each entity to work through their existing stock and no amount of preparation could take the place of a systematically phased implementation schedule.

Staggered implementation dates mean all manufacturers can begin purchasing and producing to the new requirements while still allowing existing stock to be used up. Likewise, all stakeholders need the ability to utilize not only their current stockpiled materials but also materials that they will continue to receive from manufacturers who are still in the process of exhausting their existing inventory.

Here is our recommendation for a fair and sound implementation schedule:

- **March 31, 2025:** Manufacturers to begin marking products, in conformance with AASHTO M180-23.
 - **June 30, 2025:** Manufacturers must produce all materials covered by AASHTO M180-23, as written, to include any modifications/clarification implemented before this date.
 - **Dec. 31, 2027:** Manufacturers can no longer ship material to specifiers or purchasers that does not meet AASHTO M180-23 specifications – to include any modifications/clarifications implemented before this date.
 - **Dec. 31, 2029:** Installers must install materials conforming to AASHTO M180-23.
2. **Consistency Among States and Industry.** Not only will the suggested timeline help industry avoid managing two inventories, but it will also allow for all storage yards throughout the country to cycle through existing inventories. In addition, the time frames will give both manufacturers and installers an opportunity to begin quoting projects

accordingly. To date, none of the parties impacted have a clear understanding of what the increased costing models will look like. Therefore, they haven't brought them to the market.

3. **Galvanizing Requirement Changes from ASTM A123 to AASHTO M111.** Some new language states, "surface preparation ***shall*** meet the requirements of SSPC-SP8". This requirement must not be the standard for galvanized guardrail items because currently there are no US-based manufacturers of guardrail meeting this requirement. SSPC-SP8 should be stipulated for projects that call for powder coating or painting of materials.
4. **Addressing Connection Types.** Section 6.1.1 on guardrail connection types is problematic with six variations. The verbiage in the rewrite does not match the intent that the review panel had in mind. The current rendering will lead to confusion and rejection of installed projects. We propose the removal of this section for the benefit of all stakeholders.
5. **Use Within Generic and Proprietary Systems.** Clarification is needed for using materials that meet the new AASHTO M180-23 requirement. All new products will no longer be supplied "as tested." Furthermore, it will be crucial to determine where liability concerns fall. Some DOTs will be required to strike that language from their certification requirements to accommodate repairs, maintenance and installation of new AASHTO M180-23 materials.

While the impact of, and solution to, each of these challenges will vary amongst different stakeholders, the one thing common to all involved is the need for a consistent and well-defined implementation plan. I also want to highlight the widespread industry (stakeholders) support for adopting these changes with the appropriate planning and organizing. The following industry experts have been instrumental in drafting this letter and showcasing our united front:

Ryan Ames, Lovewell Fencing Inc.
Richard Butler, Brifen USA Inc.
Michael Coffman, L.S. Lee Inc.
Jeff Grover, Gregory Industries
Gregory Neece, Valtir LLC

David Price, R.G. Steel Corporation
Paul Radice, Highway Safety LLC
Glenn Stewart, Frank Gurney Inc.
David Takiguchi, GP Roadway Solutions

Together, we can ensure a smooth transition and successful implementation of the revised AASHTO M180-23. Until an agreement is established, a Memorandum of Understanding between AASHTO and DOTs would provide clarity and alignment in driving this project forward. This collaboration is crucial to streamline processes and ensure effective long-term implementation.

We look forward to your consideration and collaboration on these critical issues and would appreciate your positive acknowledgement of this letter in a timely fashion to the [ATSSA Guardrail Committee Liaison Jessica Scheyder](#).

Sincerely,

Stacy Tetschner, CAE
ATSSA President & CEO