The National Society of Professional Engineers’ Public Comment on Docket No. FHWA-2008-0038

The National Society of Professional Engineers (NSPE) commends the Federal Highway Administration’s proposed National Tunnel Inspection Standards for highway tunnels in accordance with MAP-21. This proposed rule takes an important step in recognizing the critical role professional engineers (PEs) perform in our nation’s tunnel inspection process.

In Section 650.509 Qualifications of Personnel, the proposed rule sets forth that: “A Program Manager must, at a minimum, be a registered P.E. and have 10 years tunnel or bridge inspection experience and be a nationally certified tunnel inspector.” While NSPE strongly supports the requirement that a Program Manager be a licensed P.E. and possess 10 years of tunnel or bridge inspection experience, we respectfully urge the FHWA to eliminate the additional requirement to be a nationally certified tunnel inspector.

It is NSPE’s longstanding position that following licensure as a professional engineer, individuals may voluntarily have their expertise in a specified field of engineering recognized through an appropriate specialty certification program. However, such certification must not imply that other licensed professional engineers are less qualified for practice in a particular field of specialty. Professional engineering licensure is the only qualification for engineering practice.

The current process to license professional engineers in all states and territories is among the most rigorous for any profession. All candidates for engineering licensure must (1) obtain a four-year accredited engineering degree, (2) demonstrate four additional years of progressive engineering experience to the satisfaction of the state licensure board (3) successfully complete an eight-hour national examination on the fundamentals of engineering and (4) successfully complete an eight-hour national examination on the principles and practice of engineering. In addition, 40 states have mandatory continuing education requirements for professional engineers to maintain their professional engineering license.

By including a national certification requirement, the proposed regulations would reduce the pool of engineers available for selection while eliminating thousands of highly qualified and experienced PEs from consideration under the program. Therefore, NSPE requests that FHWA revise Section 650.509 Qualifications of Personnel, to read “A Program Manager must, at a minimum, be a registered P.E. and have 10 years tunnel or bridge inspection experience.”

Thank you for your thoughtful consideration.