

TITLE (policies, standards and specifications)

Comments received by TCP			
Comment ID	Organization	Comment	Response
454	ORBA	Our position remains that SSP 103F56 is an overly burdensome specification that does not offer proportional value to the end-user. In its current or proposed form, it remains difficult to reconcile with other contract documents and imposes an administrative and operational burden that outweighs any measurable benefit from a risk or safety perspective. ORBA recommends the Ministry consider abolishing the specification in its entirety.	MTO has considered internal and external feedback and is adjusting the Special Provision accordingly, including allowing for a wider, asymmetrical cross slope tolerance and relaxing some timelines for inspection repair and allowance of traffic on out-of-tolerance pavement. MTO considers enforcement of design cross slopes to be important in ensuring safety of the travelling public. MTO will continue to monitor the use and effectiveness of the special provision and solicit ongoing feedback from design/construction staff and the industry.
454	ORBA	313.08.01.08.03 – Basis of Acceptance ORBA recommends the removal of binder courses from the scope of SSP 103F56. Only the final surface course should be subject to these tolerances. Imposing stringent slope requirements on binder layers adds cost and complexity with little to no benefit for the final riding surface.	MTO agrees to change application of cross slope requirements on binder courses to those intended to be open to traffic for a period of 2 months or longer and any binder course that will be open to traffic over winter. Any binder course not measured, regardless of timing, shall be monitored for positive drainage and repaired immediately should any issues be identified during a contract.
454	ORBA	313.08.01.08.03 – Lots and Sublots • While we appreciate the new tolerances proposed in SSP 105F56 (April 2025) as a step forward, the penalty structure	Out of tolerance cross slope is a public safety consideration and therefore, the MTO requires that out of tolerance areas be repaired or replaced to avoid adding unsafe conditions to the network.

		<p>remains disproportionate to the degree of non-conformance.</p> <ul style="list-style-type: none"> • We recommend: a) Applying the new tolerances as the limit of acceptance without penalty; b) Introducing a minor financial penalty only where cross slope deviations exceed these tolerances by $\pm 0.3\%$; c) Rejection and mandatory repair only beyond this threshold. <p>This framework would better align consequences with the actual performance risk to the Ministry and road users.</p>	
454	ORBA	<p>3. 313.08.01.08.04 – Retesting Procedures</p> <ul style="list-style-type: none"> • Paragraph 1 – Notification Timelines: The Contractor should be given the same three business days to provide notice to the Contract Administrator, ensuring procedural fairness. • Paragraph 4 – Sublot Re-Measurement: The contractor should be able to select which sublots to challenge, rather than being required to remeasure the entire lot. This targeted approach is both more efficient and equitable. 	<p>Paragraph 1 – MTO is agreeable to this proposal</p> <p>Paragraph 4 – Sublot re-testing is applicable as described in Paragraph 3 of the Retesting Procedures clause. Individual sublots may be re-tested if a lot passes but individual sublots fail. If a lot fails and the contractor wishes to invoke the re-testing procedure, the entire procedure to obtain the lot result must be followed. In such cases, several sublots are likely to have failed. This approach to lot and sublot testing is consistent with other specifications.</p>
454	ORBA	<p>313.08.01.08.05 – Repair Timelines</p> <ul style="list-style-type: none"> • Paragraph 1 – Diamond Grinding Ambiguity: The revised wording creates 	<p>Agree, requiring a diamond grinder within one month may be onerous. Will revise the one-month timeline to</p>

		<p>confusion regarding whether the one-month repair timeline applies to diamond grinding. We recommend: a) Limiting the one-month timeline to full-lane resurfacing repairs;</p> <p>b) Allowing diamond grinding repairs to be completed prior to seasonal shutdown (unless extended in writing).</p> <p>Rationale: Diamond grinding addresses minimal non-conformances ($\leq 5\text{mm}$) and poses negligible risk. Further, logistical and cost barriers—particularly in northern Ontario—make early mobilization impractical and costly.</p>	<p>full-lane repairs and allow diamond grinding to take place when paving is completed for the season.</p>
454	ORBA	<p>313.08.01.08.05 – Re-Measurement Post-Repair</p> <p>• Para 3 – Lot Re-Measurement: ORBA strongly opposes the remeasurement of all sublots (repaired or not) at new locations:</p> <ul style="list-style-type: none"> ○ Only sublots subject to repair should be remeasured. ○ Measurements should be taken at the original rejectable locations to confirm repair effectiveness. <p>Re-measuring previously accepted sublots or selecting new locations post-repair creates unacceptable uncertainty and exposes contractors to potentially endless rework. This undermines contractual certainty and finality.</p>	<p>See response to fourth comment above.</p>

Comments received by email			
Number	Organization	Comment	Response