



**STATE OF TENNESSEE**  
**DEPARTMENT OF TRANSPORTATION**  
**TRAFFIC OPERATIONS DIVISION**  
SUITE 1800, JAMES K. POLK BUILDING  
505 DEADERICK STREET  
NASHVILLE, TENNESSEE 37243-1402

**CLAY BRIGHT**  
COMMISSIONER

**BILL LEE**  
GOVERNOR

May 13, 2021

Nicole R. Nason, Administrator  
Federal Highway Administration  
U.S. Department of Transportation  
1200 New Jersey Avenue S.E.  
Washington, DC 20590

**RE: Comments for Docket No. FHWA-2020-0001 on  
Proposed Amendment for Proposal 11<sup>th</sup> Edition of the Manual on Uniform  
Traffic Control Devices (MUTCD)**

Dear Administrator Nason,

I am writing to offer comments on the December 14, 2020 Notice of Proposed Amendment (NPA) to the MUTCD on behalf of the Tennessee Department of Transportation.

Overall, the NPA provides many positive changes to improve safety and guidance on the latest practices for traffic control devices. Tennessee appreciates the efforts FHWA has made to provide these updates to preserve uniformity, consistency and the safety of our roadway users.

We hope you find our comments helpful as FHWA finalizes the content in the 11<sup>th</sup> Edition of the MUTCD. Tennessee also encourages FHWA to pursue the rulemaking action for this edition with consideration of the changes and comments that we have proposed.

Sincerely,

Nathan Vatter, P.E.  
State Traffic Engineer  
Traffic Operations Division

C: file

Eric Jackson , Traffic Operations Division  
Joseph Sweat, Traffic Operations Division  
Brad Freeze, Director of Traffic Operations  
Paul Degges, Chief Engineer  
Will Reid, Assistant Chief Engineer of Operations

Comments on Docket No. FHWA-2020-0001 National Standards for Traffic Control Devices; the Manual on Uniform Traffic Control Devices for Streets and Highways; Revision

Proposed Section Number(s)	Agree with concept and text as proposed	Agree with concept: suggested rewording of text in Comments	Disagree with concept	Comments Please include justification for your position based on objective experience and empirical data. If there is a specific statement with which you take exception, please provide the Page and Line numbers from the mark-up version of the proposed MUTCD text.
Part 1	Yes			
Part 1	Yes			
1A.01	Yes			
1A.02	Yes			
1A.03	Yes			
1A.04	Yes			
1A.05	Yes			
1A.06	Yes			
1B.01	Yes			
1B.02	Yes			
1B.03	Yes			
Table 1B-1	Yes			
1B.03 – 1B.09	Yes			
1B.06	Yes			
1B.09	Yes			
1C	Yes			
1C.02		No		<p>91. Grade Crossing Warning System definition seems to overlap with the statement in Section 8A.01 "In Part 8, the combination of traffic control devices selected or installed at a specific grade crossing is referred to as a "traffic control system.""</p> <p>129. Minimum Track Clearance Distance definition includes "...a point to..a point.." where these points are not distinguished, which is extraordinarily vague and will lead to confusion. Perhaps there should be a reference to Section 8A.07, which provides detailed description.</p> <p>-Could a definition for "Queue start-up time", as used in Section 8A.07, be added?</p>
1C.03	Yes			
1D.01	Yes			
1D.02	Yes			
1D.04	Yes			
1D.05	Yes			
1D.06	Yes			
1D.07	Yes			
1D.08	Yes			
1D.09	Yes			
1D.10	Yes			
1D.11	Yes			
2A.01	Yes			
2A.02	Yes			
2A.04	Yes			
2A.05	Yes			

Proposed Section Number(s)	Agree with concept and text as proposed	Agree with concept: suggested rewording of text in Comments	Disagree with concept	Comments Please include justification for your position based on objective experience and empirical data. If there is a specific statement with which you take exception, please provide the Page and Line numbers from the mark-up version of the proposed MUTCD text.
2A.07	Yes			
2A.08	Yes			
2A.09		No		Disagree with the standard prohibiting the use of cultural/recreational symbols outside of the cultural/recreational area
2A.10	Yes			
2A.11	Yes			
2A.12	Yes			
2A.14	Yes			
2A.15	Yes			
2A.17			No	The last paragraph would appear to prohibit placing solar panels above the sign, this would cause issues for all current installations
2A.19		No		Existing systems of signs should be reviewed periodically for evidence of sign clutter and adjustments should be made accordingly. Could cause issues with Tort Liability as sign clutter is subjective.
2A.20	Yes			
2A.21	Yes			
2A.22	Yes			
Chapter 2B	Yes			
2B.01	Yes			
2B.02	Yes			
2B.03	Yes			
2B.04	Yes			
2B.05	Yes			
2B.06	Yes			
2B.07	Yes			
2B.08	Yes			
2B.09	Yes			
2B.10	Yes			
2B.11	Yes			
2B.12	Yes			
2B.13	Yes			
2B.14	Yes			
2B.15	Yes			
2B.16	Yes			
2B.17	Yes			
2B.18	Yes			
2B.19	Yes			
2B.20	Yes			
2B.20	Yes			
2B.20	Yes			
2B.20	Yes			
2B.20	Yes			
2B.20	Yes			
2B.20	Yes			

Proposed Section Number(s)	Agree with concept and text as proposed	Agree with concept: suggested rewording of text in Comments	Disagree with concept	Comments Please include justification for your position based on objective experience and empirical data. If there is a specific statement with which you take exception, please provide the Page and Line numbers from the mark-up version of the proposed MUTCD text.
2B.21	Yes			We support the wording to specify where 85 <sup>th</sup> percentile should be used to set speed limits.
2B.21	Yes			
2B.21	Yes			
2B.21	Yes			
2B.21	Yes			
2B.21	Yes			
2B.21	Yes			
2B.22	Yes			
2B.23	Yes			
2B.24	Yes			
2B.25	Yes			
2B.26	Yes			
2B.26	Yes			
2B.26	Yes			
2B.26	Yes			
2B.27	Yes			
2B.27	Yes			
2B.28	Yes			
2B.28	Yes			
2B.28	Yes			
2B.28	Yes			
2B.28	Yes			
2B.28	Yes			
2B.28			No	Use of the “Do not drive on shoulder” should be an option and not guidance to leave it to engineering judgment if it is needed at the location.
2B.29	Yes			
2B.29	Yes			
2B.29	Yes			
2B.29	Yes			
2B.31	Yes			
2B.31	Yes			
2B.31	Yes			
2B.31	Yes			
2B.31	Yes			
2B.31	Yes			
2B.33	Yes			
2B.34	Yes			
2B.34	Yes			
2B.38	Yes			
2B.40	Yes			
2B.40	Yes			
2B.45	Yes			

Proposed Section Number(s)	Agree with concept and text as proposed	Agree with concept: suggested rewording of text in Comments	Disagree with concept	Comments Please include justification for your position based on objective experience and empirical data. If there is a specific statement with which you take exception, please provide the Page and Line numbers from the mark-up version of the proposed MUTCD text.
2B.46	Yes			
2B.46	Yes			
2B.46	Yes			
Sub-Chapter DO NOT ENTER, WRONG WAY, AND ONE-WAY Signs and Related Signs and Plaques	Yes			
2B.47	Yes			
2B.47			No	Recommend to allow Red LED's only on Do not Enter signs
2B.48	Yes			
2B.48			No	Recommend to allow Red LED's only on Wrong Way signs
2B.49	Yes			
2B.49	Yes			
2B.49	Yes			
2B.49	Yes			
2B.49	Yes			
2B.50	Yes			
2B.50			No	The R6-4 Roundabout Directional arrow sign should not be removed from this application to allow flexibility.
2B.50	Yes			
2B.50	Yes			
2B.51	Yes			
2B.52	Yes			
Deleted 2B.43			No	The R6-4 Roundabout Directional arrow sign should not be removed from this application to allow flexibility.
2B.51	Yes			
Deleted 2B.45	Yes			
2B.53	Yes			
2B.54	Yes			
2B.54	Yes			
2B.54	Yes			
2B.54	Yes			
2B.54	Yes			
2B.54	Yes			
2B.54	Yes			
2B.55	Yes			
2B.56	Yes			
2B.57	Yes			
2B.59	Yes			
2B.59	Yes			
2B.59	Yes			
2B.59	Yes			
2B.60	Yes			
2B.60	Yes			

Proposed Section Number(s)	Agree with concept and text as proposed	Agree with concept: suggested rewording of text in Comments	Disagree with concept	Comments Please include justification for your position based on objective experience and empirical data. If there is a specific statement with which you take exception, please provide the Page and Line numbers from the mark-up version of the proposed MUTCD text.
2B.60	Yes			
2B.60	Yes			
2B.60	Yes			
2B.60	Yes			
2B.61	Yes			
2B.61	Yes			
2B.62	Yes			
2B.62	Yes			
2B.62	Yes			
2B.66	Yes			
2B.66	Yes			
2B.66	Yes			
2B.66	Yes			
2B.66	Yes			
2B.66	Yes			
2B.66	Yes			
2B.66	Yes			
2B.66	Yes			
2B.66	Yes			
2B.66	Yes			
2B.66	Yes		No	Should be downgraded to an option or support statement rather than a standard, this would be a complicated process to do to all areas that are established.
2B.66	Yes			
2B.66	Yes			
2B.67	Yes			
2B.67	Yes			
2B.68	Yes			
2B.72	Yes			
2B.71	Yes			
2B.73	Yes			
2B.77	Yes			
2B.77	Yes			
2B.77	Yes			
2C	Yes			
Deleted 2C.01	Yes			
2C.01	Yes			
2C.02	Yes			
2C.02	Yes			
2C.02	Yes			
2C.02	Yes			
2C.03	Yes			
2C.04	Yes			
2C.05	Yes			
2C.06	Yes			
2C.07	Yes			
2C.08	Yes			

Proposed Section Number(s)	Agree with concept and text as proposed	Agree with concept: suggested rewording of text in Comments	Disagree with concept	Comments Please include justification for your position based on objective experience and empirical data. If there is a specific statement with which you take exception, please provide the Page and Line numbers from the mark-up version of the proposed MUTCD text.
2C.09			No	Propose not to delete this section as the signs when used correctly are of great use in some applications.
2C.10			No	Recommend against the use of Large arrow sign in a roundabout
2C.10	Yes			
2C.11	Yes			
2C.12	Yes			
2C.13	Yes			
2C.14	Yes			
2C.16	Yes			
2C.18, 2C.19	Yes			
2C.24	Yes			
2C.25	Yes			
2C.26	Yes			
2C.28	Yes			
2C.30	Yes			
2C.34	Yes			
2C.35	Yes			
2C.36	Yes			
2C.36	Yes			
2C.37	Yes			
2C.39	Yes			
2C.40	Yes			
2C.41	Yes			
2C.42	Yes			
2C.42	Yes			
2C.43	Yes			
2C.44	Yes			
2C.45	Yes			
2C.45	Yes			
2C.46	Yes			
2C.47	Yes			
2C.47	Yes			
2C.47	Yes			
2C.48	Yes			
2C.49	Yes			
2C.50	Yes			
2C.50	Yes			
2C.52	Yes			
2C.54	Yes			
2C.54	Yes			
2C.59	Yes			
2C.59	Yes			
2C.60	Yes			
2C.66	Yes			
2C.67	Yes			

Proposed Section Number(s)	Agree with concept and text as proposed	Agree with concept: suggested rewording of text in Comments	Disagree with concept	Comments Please include justification for your position based on objective experience and empirical data. If there is a specific statement with which you take exception, please provide the Page and Line numbers from the mark-up version of the proposed MUTCD text.
2C.71	Yes			
2D.01	Yes			
2D.05	Yes			
2D.07	Yes			
2D.08	Yes			
2D.09	Yes			
2D.11	Yes			
2D.12	Yes			
2D.16	Yes			
2D.17	Yes			
2D.29		No		Should be listed as an option since there could be site restrictions that would limit a larger guide sign
2D.34	Yes			
2D.35	Yes			
2D.36	Yes			
2D.37	Yes			
2D.39	Yes			
2D.40	Yes			
2D.41	Yes			
2D.45	Yes			
2D.46	Yes			
2D.47	Yes			
2D.49	Yes			
2D.51	Yes			
2D.52	Yes			
2D.53	Yes			
2D.54	Yes			
2D.55	Yes			
2D.56	Yes			
2D.57	Yes			
2D.58	Yes			
2D.59	Yes			
2E	Yes			
2E.01	Yes			
2E.06	Yes			
2E.07	Yes			
2E.08	Yes			
2E.12	Yes			
2E.14	Yes			
2E.15	Yes			
2E.16	Yes			
2E.17	Yes			
2E.18			No	This should not be a standard as it could lead to larger guide signs than are necessary for ground mounted use.
2E.20	Yes			
2E.21	Yes			



Proposed Section Number(s)	Agree with concept and text as proposed	Agree with concept: suggested rewording of text in Comments	Disagree with concept	Comments Please include justification for your position based on objective experience and empirical data. If there is a specific statement with which you take exception, please provide the Page and Line numbers from the mark-up version of the proposed MUTCD text.
2E.22			No	Disagree with new standard for exits with different number of exits in each direction to use different suffix letters for exits. Could lead to confusion on why the numbering is different.
2E.23	Yes			
2E.24	Yes			
2E.25	Yes			
2E.26	Yes			
2E.27	Yes			
2E.28	Yes			
2E.29	Yes			
2E.31	Yes			
2E.32	Yes			
2E.33	Yes			
2E.34	Yes			
2E.35	Yes			
2E.36	Yes			
2E.37	Yes			
2E.38	Yes			
2E.40	Yes			
2E.41			No	Do not agree with proposal to delete this section, there could be applications that diagrammatic guide signs are desirable.
2E.42	Yes			
2E.45	Yes			
2E.48	Yes			
2E.49	Yes			
2E.50	Yes			
2E.51	Yes			
2E.52	Yes			
2E.53	Yes			
2E.54	Yes			
2E.55	Yes			
2E.56	Yes			
2E.57	Yes			
2F	Yes			
2F.02	Yes			
2F.03	Yes			
2F.04	Yes			
2F.05	Yes			
2F.06-2F.09	Yes			
2F.10	Yes			
2F.11	Yes			
2F.12	Yes			
2F.13	Yes			
2F.17	Yes			
2F.18	Yes			
2F.18	Yes			

Proposed Section Number(s)	Agree with concept and text as proposed	Agree with concept: suggested rewording of text in Comments	Disagree with concept	Comments Please include justification for your position based on objective experience and empirical data. If there is a specific statement with which you take exception, please provide the Page and Line numbers from the mark-up version of the proposed MUTCD text.
2F.19	Yes			
2G.01	Yes			
2G.03	Yes			
2G.04	Yes			
2G.05	Yes			
2G.07	Yes			
2G.11	Yes			
2G.17	Yes			
2G.19	Yes			
2G.20	Yes			
2G.21	Yes			
2G.22	Yes			
2G.23	Yes			
2G.24	Yes			
2G.25	Yes			
2G.26	Yes			
2H.01	Yes			
2H.02	Yes			
2H.03	Yes			
2H.04	Yes			
2H.05	Yes			
2H.06	Yes			
2H.07			No	State welcome signs are not traffic control devices and should not be regulated by the MUTCD
2H.08	Yes			
2H.09	Yes			
2H.10	Yes			
2H.11	Yes			
2H.12			No	We disagree with the removal of the blue background as since it was an option in the past we have established a system on all interstate miles in TN on a blue background. Blue in our opinion provides motorist information and we feel that is an appropriate application for these signs
2H.07	Yes			
2H.13	Yes			
2H.14		No		Alternative fuel corridor signs should be allowed without having to sign the individual facilities at each exit with General Service Signs. To add on to comments below states should be allowed to decide if they want to sign Alt fuel facilities on the LOGO program.
2I.02	Yes			
2I.03	Yes			
2I.04	Yes			
2I.08	Yes			
2I.09	Yes			
2I.10	Yes			

Proposed Section Number(s)	Agree with concept and text as proposed	Agree with concept: suggested rewording of text in Comments	Disagree with concept	Comments Please include justification for your position based on objective experience and empirical data. If there is a specific statement with which you take exception, please provide the Page and Line numbers from the mark-up version of the proposed MUTCD text.
2I.11	Yes			
2I.12	Yes			
2I.13	Yes			
2I.14	Yes			
2I.15	Yes			
2J.01	Yes			
2J.01		No		It should be left up to individual states on whether or not to allow for Alt fuel facilities to be signed on the Gas sign, if this is allowed then Fuel would be more appropriate as the classification of the sign instead of Gas.
2J.02		No		We allow up to six attractions on our LOGO program and would not want to set a limit of four.
2J.03		No		It should be left up to individual states on whether or not to allow for Alt fuel facilities to be signed on the Gas sign, if this is allowed then Fuel would be more appropriate as the classification of the sign instead of Gas.
2J.06	Yes			
2J.07	Yes			
2J.09	Yes			
2J.11	Yes			
2J.12	Yes			
2K.01	Yes			
2K.02	Yes			
2K.04			No	Our current TODS program has followed the previous rules for 4 signs on an assembly and currently have a lot of locations that have 4 signs at a location. This would cause future issues when other locations reference those having 4 businesses
2L.01	Yes			
2L.01, 2L.02			No	. The use of statistical information should be allowed Ex. Fatal YTD Info
2L.03	Yes			
2L.04	Yes			
2L.05	Yes			
2L.06	Yes			
2L.07	Yes			
2L.08			No	This should not prevent states from pushing safety messages at other parts of the year.
2L.09	Yes			
2M.02	Yes			
2M.04	Yes			
2M.06	Yes			
2M.07	Yes			
2M.08	Yes			
2M.09	Yes			
2M.10	Yes			

Proposed Section Number(s)	Agree with concept and text as proposed	Agree with concept: suggested rewording of text in Comments	Disagree with concept	Comments Please include justification for your position based on objective experience and empirical data. If there is a specific statement with which you take exception, please provide the Page and Line numbers from the mark-up version of the proposed MUTCD text.
2N	Yes			
2N.02	Yes			
2N.03	Yes			
2N.04	Yes			
2N.05	Yes			
Part 3	Yes			
3A.01	Yes			
3A.02	Yes			
3A.03	Yes			
3A.04	Yes			
3B.01	Yes			
3B.02	Yes			
3B.03	Yes			
3B.04, 3I.03	Yes			
3B.05	Yes			
3B.06	Yes			
3B.07	Yes			
3B.08	Yes			
3B.09	Yes			
3B.11	Yes			
3B.12	Yes			
3B.13	Yes			
3B.17	Yes			
Deleted	Yes			
3B.18		no		FHWA proposes to change a Support statement to a Standard paragraph requiring crosswalk markings at non-intersection crossing locations to improve safety for pedestrians at locations where vehicles may not expect pedestrian crossings.
3B.19	Yes			
3B.20	Yes			
3B.21	Yes			
3B.22	Yes			
3B.25	Yes			
3B.27	Yes			
Deleted	Yes			
3B.28	Yes			
3B.29	Yes			
3B.31	Yes			
3C.01	Yes			
3C.02	Yes			
3C.03	Yes			
3C.04	Yes			
3C.05	Yes			
3C.06,3C.07, 3C.08	Yes			
3C.10	Yes			

Proposed Section Number(s)	Agree with concept and text as proposed	Agree with concept: suggested rewording of text in Comments	Disagree with concept	Comments Please include justification for your position based on objective experience and empirical data. If there is a specific statement with which you take exception, please provide the Page and Line numbers from the mark-up version of the proposed MUTCD text.
3C.11	Yes			
Chapter 3D	Yes			
3D.01	Yes			
3D.02	Yes			
3D.04	Yes			
3D.06	Yes			
Chapter 3E	Yes			
3E.02	Yes			
3E.03	Yes			
3E.04	Yes			
3F.02	Yes			
3G.03	Yes			
3H.01	Yes			
3H.02	Yes			
3H.03		No		TDOT recognizes concerns related to driver and pedestrian distraction, and also recognizes that allowing some flexibility aesthetic crosswalks has benefits in traffic calming to improve pedestrian awareness and safety. The purpose of aesthetic crosswalks is to have vehicle operators pay more attention and slow down at crosswalks which is a benefit to pedestrians. Based on research from the National Traffic Safety Board (2017), vehicle speeds greater than or equal to 40 mph result in a fatality 85% of the time, at 30 mph the fatalities reduce to 45%, and at 20 mph the fatalities reduce to 5%. Aesthetic crosswalk shall still be identified with white transverse lines and entrances into crosswalks shall still be identified with detectable warning surfaces for users with visual impairments.
3H.04	Yes			
3H.05	Yes			
3H.06	Yes			
3H.07	Yes			
3H.08	Yes			
3I.01	Yes			
3I.02	Yes			
3J	Yes			
3J.02	Yes			
3J.03	Yes			
3J.04	Yes			
3J.05	Yes			
3J.07	Yes			
Deleted 3I.03	Yes			
Part 4	Yes			
4F.08, 4F.15, 4F.02, 4F.09, 4F.16	Yes			
4A.05	Yes			

Proposed Section Number(s)	Agree with concept and text as proposed	Agree with concept: suggested rewording of text in Comments	Disagree with concept	Comments Please include justification for your position based on objective experience and empirical data. If there is a specific statement with which you take exception, please provide the Page and Line numbers from the mark-up version of the proposed MUTCD text.
4A.08	Yes			
4B.02	Yes			
(Deleted)	Yes			
4B.05	Yes			
4C.01, 4B.05	Yes			
Sections 4C.02 - 4C.10	Yes			
4C.02, 4C.03, 4C.04, 4C.08	Yes			
4C.05	Yes			
4C.08	Yes			
4D.01	Yes			
4D.02	Yes			
4D.03	Yes			
4D.05	Yes			
4D.06	Yes			
4D.07	Yes			
4D.08	Yes			
4D.09	Yes			
4D.10	Yes			
4E.01	Yes			
4E.02	Yes			
4F.01	Yes			
4F.02	Yes			
4F.04, 4F.06, 4F.08, 4F.11, 4F.13, 4F.15	Yes			
4F.06, 4F.13	Yes			
4F.08	Yes			
4F.09	Yes			
4F.15	Yes			
4F.16	Yes			
4F.17	Yes			
4F.19	Yes			
4G.02	Yes			
4G.04	Yes			
Chapter 4H	Yes			
4D.02	Yes			
4I.01	Yes			
4I.02	Yes			
4I.03	Yes			
4I.04	Yes			
4I.05	Yes			
4I.06	Yes			
4J.01	Yes			
4J.02	Yes			

Proposed Section Number(s)	Agree with concept and text as proposed	Agree with concept: suggested rewording of text in Comments	Disagree with concept	Comments Please include justification for your position based on objective experience and empirical data. If there is a specific statement with which you take exception, please provide the Page and Line numbers from the mark-up version of the proposed MUTCD text.
4J.03	Yes			
4K.01	Yes			
4K.03	Yes			
4K.04	Yes			
4K.05	Yes			
4L	Yes			
4M.03	Yes			
4N.03	Yes			
4P.02	Yes			
4P.03	Yes			
4Q.02	Yes			
4S.01, 4S.04	Yes			
4S.02	Yes			
4L.03	Yes			
4S.04	Yes			
4S.05	Yes			
4T.01	Yes			
4T.03	Yes			
4T.04	Yes			
4U.01	Yes			
4U.02	Yes			
Chapter 5	Yes			
5A.01	Yes			
5A.02	Yes			
5A.03	Yes			
	Yes			
5A.04	Yes			
	Yes			
5B	Yes			
5B.01	Yes			
	Yes			
5B.02	Yes			
5B.03	Yes			
	Yes			
5B.04	Yes			
	Yes			
	Yes			
5B.05	Yes			
5B.06	Yes			
5C	Yes			
Part 6	Yes			
Part 6	Yes			
Part 6	Yes			
6A.01	Yes			
6A.02	Yes			
6A.03 & 6A.04	Yes			

Proposed Section Number(s)	Agree with concept and text as proposed	Agree with concept: suggested rewording of text in Comments	Disagree with concept	Comments Please include justification for your position based on objective experience and empirical data. If there is a specific statement with which you take exception, please provide the Page and Line numbers from the mark-up version of the proposed MUTCD text.
6B.01	Yes			
6B.04	Yes			
6B.05	Yes			
6B.08	Yes			
6C.02	Yes			
6C.03	Yes			
6C.05	Yes			
6D.02		No		2009 MUTCD, P.30, Section 2A.07.12 refers to illumination (LEDs). May impact our current Stop/Slow Paddles if significant changes are made in either section. Several months ago, I thought that Eastern Metal was discussing proposed changes for these sections and how that would eliminate their product for allowed use? It was regarding Section 6E.03.05 for conspicuity. I do not know where that ended up.
6D.03	Yes			
6D.05		No		Also, keep or strengthen 6E.02.03 for high visibility apparel for uniformed law enforcement to include some sort of high-visibility gloves if hand signals alone are allowed.
6D.06	Yes			
6E.04	Yes			
6F.01	Yes			
6F.02	Yes			
6G.07	Yes			
6G.10	Yes			
6G.11	Yes			
6H.01	Yes			
6H.03	Yes			
6H.04	Yes			
6H.05	Yes			
6H.06	Yes			
6H.07	Yes			
6H.08	Yes			
6H.24	Yes			
6H.25	Yes			
6J.01	Yes			
6J.03	Yes			
6K.01	Yes			
6K.02	Yes			
6K.07	Yes			
6K.11	Yes			
6L.01	Yes			
6L.03	Yes			
6L.04	Yes			
6L.07		No		Would this not allow for the use of sequential lights in shifting taper after this change.
6M.01	Yes			



Proposed Section Number(s)	Agree with concept and text as proposed	Agree with concept: suggested rewording of text in Comments	Disagree with concept	Comments Please include justification for your position based on objective experience and empirical data. If there is a specific statement with which you take exception, please provide the Page and Line numbers from the mark-up version of the proposed MUTCD text.
6M.02	Yes			
6M.04	Yes			
6M.05	Yes			
N/A	Yes			
6M.08	Yes			
6N.01	Yes			
6N.04	Yes			
6N.05	Yes			
6N.13	Yes			
6N.14	Yes			
6N.19	Yes			
6O.01	Yes			
6P.01	Yes			
6P-47	Yes			
6P-48	Yes			
6P-49	Yes			
6P-50	Yes			
6P-51	Yes			
6P-52	Yes			
6P-53	Yes			
6P-54	Yes			
Fig 6P-3	Yes			
Fig 6P-4	Yes			
Fig 6P-6	Yes			
Fig 6P-7	Yes			
Fig 6P-10	Yes			
Fig 6P-11	Yes			
Fig 6P-12	Yes			
Fig 6P-13	Yes			
Fig 6P-14	Yes			
Fig 6P-15	Yes			
Fig 6P-17	Yes			
Fig 6P-18	Yes			
Fig 6P-21	Yes			
Fig 6P-22	Yes			
Fig 6P-23	Yes			
Fig 6P-24	Yes			
Fig 6P-25	Yes			
Fig 6P-27	Yes			
Fig 6P-28	Yes			
Fig 6P-29	Yes			
Fig 6P-30	Yes			
Fig 6P-31	Yes			
Fig 6P-32	Yes			
Fig 6P-33	Yes			
Fig 6P-35	Yes			

Proposed Section Number(s)	Agree with concept and text as proposed	Agree with concept: suggested rewording of text in Comments	Disagree with concept	Comments Please include justification for your position based on objective experience and empirical data. If there is a specific statement with which you take exception, please provide the Page and Line numbers from the mark-up version of the proposed MUTCD text.
Fig 6P-37	Yes			
Fig 6P-38	Yes			
Fig 6P-40	Yes			
Fig 6P-41	Yes			
Fig 6P-42	Yes			
Fig 6P-43	Yes			
Fig 6P-44	Yes			
Fig 6P-46	Yes			
7A.01 and 7A.02	Yes			
7A.01	Yes			
7D.01	Yes			
7B.01	Yes			
7B.02	Yes			
7B.03	Yes			
7B.04	Yes			
7B.05	Yes			
7B.06	Yes			
7D.01	Yes			
7D.02	Yes			
8A.01	Yes			
8A.02	Yes			
8A.03	Yes			
8A.04	Yes			
8A.05	Yes			
8A.06	Yes			
8A.07	Yes			
8A.08		No		The Support includes "Where the distance between the tracks at adjacent grade crossings, measured along the highway between the inside rails, is more than 100 feet, additional signs or other appropriate traffic control devices should be used to inform approaching road users of the long distance to cross the tracks." What signs are designated for that purpose? Can this be clarified.

Proposed Section Number(s)	Agree with concept and text as proposed	Agree with concept: suggested rewording of text in Comments	Disagree with concept	Comments Please include justification for your position based on objective experience and empirical data. If there is a specific statement with which you take exception, please provide the Page and Line numbers from the mark-up version of the proposed MUTCD text.
8A.09		No		-Consider modifying the proposed Section 8A.09 Option to "If a particular grade crossing appears to be redundant or unnecessary, an engineering study may be conducted to determine whether to eliminate the crossing." -I worry about the proposal in Section 8A.09 of changing the Standard of "When a grade crossing is eliminated, the traffic control devices for the crossing shall be removed. If the existing traffic control devices at a multiple-track grade crossing become improperly placed or inaccurate because of the removal of some of the tracks, the existing devices shall be relocated and/or modified." I'm sure railroads would like it, but it creates the issue of how to remove inappropriate railroad company maintained traffic control devices that should be removed without such a Standard.
8A.12	Yes			
8A.13	Yes			
8A.14	Yes			
8B.02	Yes			
8B.03	Yes			
8B.04	Yes			
8B.05	Yes			
8B.06	Yes			
8B.07	Yes			
8B.08	Yes			
8B.16	Yes			
9B.21	Yes			
8B.20	Yes			
8B.23	Yes			
8B.24	Yes			
8B.26	Yes			
8C.01	Yes			
8C.02	Yes			
8C.03	Yes			
8C.04 8C.05	Yes			
8C.06	Yes			
8D.01	Yes			
8D.02	Yes			

Proposed Section Number(s)	Agree with concept and text as proposed	Agree with concept: suggested rewording of text in Comments	Disagree with concept	Comments Please include justification for your position based on objective experience and empirical data. If there is a specific statement with which you take exception, please provide the Page and Line numbers from the mark-up version of the proposed MUTCD text.
8D.03		No		Section 8D.03 Automatic Gates should have Guidance stating "If an automatic gate is used at an active grade crossing where road users are controlled by flashing-light signals, when in the down position, the gate arm should be at a right angle to the traveled way." Similar to Section 8C.03 Stop and Yield Lines - Guidance "If a yield line (see Figure 3B-16) or stop line is used at a passive grade crossing, it should be a transverse line (see Figure 3B-16) at a right angle to the traveled way" and Guidance "If a stop line is used at an active grade crossing where road users are controlled by flashing-light signals, it should be a transverse line at a right angle to the traveled way".
8D.04	Yes			
8D.05	Yes			
8D.07	Yes			
8D.09	Yes			
8D.10	Yes			
8D.11	Yes			
8D.12	Yes			
8D.13	Yes			
8D.14	Yes			
8D.15	Yes			
8D.16	Yes			
8E.01	Yes			
8E.02	Yes			
8E.03	Yes			
8E.04	Yes			
8E.05	Yes			
8E.06	Yes			
8E.07	Yes			
8E.08	Yes			
8E.09		No		The new proposed Standard "A pathway or sidewalk grade crossing across tracks where trains are permitted to travel at speeds of 80 mph or higher shall be equipped with a system of automatic pedestrian gates and an escape area 38 with swing gates and fencing installed in the vicinity of the crossing to direct users to the pathway or sidewalk grade crossing (see Figure 8E-7) unless an engineering study determines that other safety treatments for the crossing would be more appropriate." calls for pedestrain gates when they are known to have a lot of compliance issues - people just go around them or raise them up. While the "unless an engineering study determines" text is included, the "shall be equipped" sounds like a mandate to use on a questionable device.
8E.10	Yes			

Proposed Section Number(s)	Agree with concept and text as proposed	Agree with concept: suggested rewording of text in Comments	Disagree with concept	Comments Please include justification for your position based on objective experience and empirical data. If there is a specific statement with which you take exception, please provide the Page and Line numbers from the mark-up version of the proposed MUTCD text.
9A.01	Yes			
9A.01	Yes			
9A.02	Yes			
9A.03	Yes			
9A.03	Yes			
9B.01	Yes			
9B.02	Yes			
9B.03	Yes			
9B.04	Yes			
9B.08	Yes			
9B.10	Yes			
9B.11	Yes			
9B.12	Yes			
9B.14	Yes			
9B.15	Yes			
9B.16	Yes			
9B.17	Yes			
9B.18	Yes			
9B.19	Yes			
9B.20	Yes			
9B.21	Yes			
9B.22	Yes			
9B.23	Yes			
9B.25	Yes			
9C.05	Yes			
9C.06	Yes			
9C.07	Yes			
9C.08	Yes			
9C.09	Yes			
9D.01	Yes			
9D.02	Yes			
9D.03	Yes			
9D.04	Yes			
9D.05	Yes			
9D.06	Yes			
9D.07	Yes			
9D.08	Yes			
9D.09	Yes			
9D.10	Yes			
9D.12	Yes			
9D.13	Yes			
9E.01	Yes			
9E.02	Yes			
9E.03	Yes			
9E.04	Yes			
9E.05	Yes			

Proposed Section Number(s)	Agree with concept and text as proposed	Agree with concept: suggested rewording of text in Comments	Disagree with concept	Comments Please include justification for your position based on objective experience and empirical data. If there is a specific statement with which you take exception, please provide the Page and Line numbers from the mark-up version of the proposed MUTCD text.
9E.06	Yes			
9E.07	Yes			
9E.08	Yes			
9E.09	Yes			
9E.10	Yes			
9E.11	Yes			
9E.12	Yes			
9E.13	Yes			
9E.14	Yes			
9E.15	Yes			
9E.17	Yes			
9F.02	Yes			
9G	Yes			
9G.01	Yes			
9G.02	Yes			
9G.03	Yes			
9G.04	Yes			
9G.05	Yes			
9G.06	Yes			