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May 14, 2021

Stephanie Pollack Acting Administrator (HOA-1)
Federal Highway Administration
1200 New Jersey Avenue, S.E.
Washington, DC 20590

Re: Accessible Design for the Blind Comments on Notice of Proposed Amendment
for Proposed 11th Edition of the Manual on Uniform Traffic Control Devices
(MUTCD)

Dear Acting Administrator Pollack:

Accessible Design for the Blind is a woman-owned business that was started in 1992 by Billie Louise (Beezy) Bentzen. The business was incorporated in 2004 as Barlow Design, Inc. dba Accessible Design for the Blind; Janet M. Barlow is now President and Dr. Bentzen continues as Director of Research. Both Dr. Bentzen and Ms. Barlow are Certified Orientation and Mobility Specialists with a long history of teaching safe travel techniques to pedestrians who are blind or who have low vision, many of whom also have cognitive, mobility or hearing impairments. Building on this direct service background, ADB has participated in an extensive research program to identify methods to make the built environment more accessible to pedestrians with disabilities. Linda Myers, COMS, Jennifer Graham, COMS and Alan Scott, PhD joined the team in 2020.

Accessible Design for the Blind has been involved in consulting and research throughout the United States and regularly presents sessions and seminars on access issues for pedestrians who are blind or who have low vision at conferences of the Association for Education and Rehabilitation of the Blind and Visually Impaired, the American Council of the Blind, the Transportation Research Board, the Institute of Transportation Engineers, and other organizations. Barlow served on the Access Board's Public Rights-of-Way Access Advisory Committee in developing the guidelines that became proposed PROWAG. Both Bentzen and Barlow continue to work closely with staff of the US Access Board, the FHWA MUTCD team and the National Committee on Uniform Traffic Control Devices in development of guidelines related to accessibility of the built environment to individuals with disabilities.

In developing our comments, we note that the ADA requirement for effective communication is being applied in some MUTCD sections (noted in preamble to Part 6) but not in others (no mention in Part 4). We are particularly concerned about the continuing lack of requirements for accessible pedestrian



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signals wherever pedestrian signals are installed. The traditional techniques for deciding when to begin crossing the street have been made obsolete by the complexity of signal systems. Pedestrians who are blind, or who have low vision, or elderly pedestrian who may not be able to see the pedestrian signal at a four lane road are guessing when to cross at modern signals and often make mistakes.

Other issues of concern to us are crosswalk markings and pedestrian paths and guidance in construction zones. We did not have time to adequately review Part 7, 8 and 9 and urge FHWA MUTCD team to carefully consider effect of any changes on pedestrians who are blind, who have low vision, or who are deaf blind.

We appreciate this opportunity to formally comment and are available to answer MUTCD team questions if needed. jmbarlow@accessforblind.org or bbentzen@accessforblind.org.

Sincerely,

Janet M. Barlow
Accessible Design for the Blind