

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

Please use this form to provide comments on the Notice of Proposed Amendments for the MUTCD.

INSTRUCTIONS:

1. Add your name or organization name where indicated in the footer of this form.
2. Use Table 1 to provide your original comments.
3. Use Table 2 to indicate your agreement with a comment that another commenter has submitted to the docket.
4. Do not adjust formatting of the rows and columns; text will automatically wrap and expand the row height as you type.
5. To add rows to this form, use the "Insert Rows" function, or hover just outside the left edge of the row below which you would like to add a row and click the encircled "+" that appears.
6. If you choose to provide a letter to accompany this comment form, please **print the document as a PDF**; **please do not scan a hard copy**. This will assist FHWA with cataloging your comments.

TABLE 1. ORIGINAL COMMENTS ON PROPOSED CHANGES. Please indicate the applicable proposed Section numbers in the far-left column. In the next three columns, please indicate your agreement, disagreement, or whether the column is applicable to your response by placing a, "YES," "NO," or "N/A" in the appropriate column of the row. If you agree with a proposed change, then there is no need to fill out the additional columns beyond the first two. However, it can be helpful to explain why you agree with a proposed change based on your objective experience as a roadway operator and/or empirical data. If you disagree in part or in whole, then please provide additional information that FHWA may find helpful.

Proposed Section Number(s)	Agree with concept and text as proposed	Agree with concept; suggested rewording of text in Comments	Disagree with concept	Comments <i>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.</i>
2A.17	NO	N/A	YES	Page 56; Lines 3-8. Eliminate the second sentence of this Standard requiring equipment for powering electronic components to be installed below or behind the sign. Reword as follows: "Such equipment shall be mounted so as not to detract from or obscure the face of the sign and so as not to obscure the shape of the sign." Asking agencies to determine whether equipment located above a certain sign might cast a shadow on the sign (for a brief portion of the day, on certain days only) may preclude the use of this technology from being used as an effective safety enhancement in rural locations where power may not be readily available – or too costly to provide to the site. Placing this equipment below the sign may be unfeasible due to tampering; and equally so behind the sign due to the additional cost to build a support structure.
2A.19	NO	N/A	YES	Page 56; Lines 39-43. This will place an undue burden on agencies and a degree of liability by recommending a review of all signs in the vicinity to determine which existing signs should be considered for replacement, relocation, or removal each time a new sign is placed. And, the recommendation that "existing systems of signs should be reviewed periodically for evidence of sign clutter" is problematic because it fails to define what a sign system is and how often is periodic. Recommend making this statement Support language.
2B.21	YES	N/A	N/A	Agree with the language in the NPA and recommend keeping it as is. The language in the NPA allows for more flexibility for setting speeds in urban areas.
2C.25 & Table 1B.1	NO	N/A	YES	Page 133/781; Lines 31-33 & Table 1B.1. The Low Clearance sign (W12-2) is now called "The Low Clearance Advance" sign. What is unspecified in the text of Section 2C.25 is <u>how far</u> in advance of the structure the sign is required to be placed. There is a <u>Guidance</u> statement in paragraph 04 of 2C.25 stating a "supplemental

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				distance plaque should also be placed at the nearest intersecting road or wide point in the road at which a vehicle can detour or turn around". Although the advance sign located at a detour or turn-around is guidance yet Table 1B-1 indicates a compliance date for a guidance sign. I agree that the advance sign located at the nearest detour or turnaround location should be a Guidance statement. I recommend the compliance date for the sign located at the "nearest intersecting road..." be eliminated.
2L.05	NO	N/A	YES	Page 321/781; Lines 45-47. The standard that "the entire message shall be the same, regardless of the sequence in which it is read" is overly burdensome. This standard is not necessary in instances where motorists are able to see at least 3 of the maximum 2 frames of the CMS before passing out of view. I propose adding a qualifier to this standard as follows "...provided at least three frames of the message will not be viewed while driving at the posted speed." Based on my experience with and observation of CMS messaging, I might anticipate this standard as written will be met with a significant degree of non-compliance which will foster disrespect for the Manual.

TABLE 2. AGREE WITH ANOTHER COMMENTER. If you agree with another commenter, please indicate the commenter with whom you agree with and note any additional information FHWA may find helpful or any exceptions.

Docket Comment Number and/or Commenter Name	Agree with commenter's comments as written	Agree with commenter; with exception(s)	Additional information helpful to FHWA, or exceptions to commenter's comments

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