

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>
Part 1			NO	May agree with relocating the history perhaps to the pre-amble of the MUTCD and having it on the website, but not with completely deleting it from the MUTCD. It remains important, not irrelevant and still belongs in some form within the MUTCD document.
1A.01		YES		Overall agree with portions of the support statement that makes up Section 1A.01 that explain the MUTCD to all concerned. However, do not agree with removing as many of the "other resources" as have been done within the NPA because the practical reality for most public agencies. Due to constrained budgets and how long it can take to order reference documents, leads to decisions having to be made long before those documents would arrive, <u>if adequate budget</u> is available to order them. This can put a barrier between having all the information needed for an <u>important safety decision</u> and being able to respond as a governmental agency with <u>liability</u> .
1A.02	YES			Agree overall
1A.03	YES	?		Agree with defining the target users and the definitions. And, <u>Question: Should Automated Vehicles also be a targeted user?</u>
1A.04		YES		Line 6, page 4, need to change "a" to "as" so it reads: "...would be referenced in writing as..."
1A.05		YES		Note: As a voting member of the NCUTCD and in observance of the immense pressure to review the entire NPA under a very tight timeline, the NCUTCD proposed to remove some documents which <u>we do not concur with</u> : Overall we concur with the NPA instead except that we recommend that the following documents (which may have been suggested by others for removal) are <u>retained</u> include: 1. "AAA's...." (retain) 14: "Guidelines...Clearance Intervals...2020....ITE" (<u>retain and critically needed to help protect practitioners who are under immense pressure to in some cases to reduce the amount of yellow clearance time to increase the amount of red light running—revenue needs and</u>

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				<p><i>outside influences are very real. These pressures are not in the interest of safety nor ethical. Most red-light running occurs within the first ½ second to 1 second of yellow and it is unjust to in any way short ANY roadway user, bicyclists, pedestrians, or drivers, the adequate time required over revenue. Much work went into this ITE document and this document should absolutely be retained if the priority of safety is valued. In addition to being unsafe, it can also be unjust when in fact the driver was driving reasonably, and a \$500+ ticket (in some states—and point on the license) could further impact those who are already home-challenged—this can also be viewed as a “social justice/equity issue” as automated enforcement implementations, have also occurred in some of the least financially well-off areas—thereby adversely impacting those already faced with financial challenges.)</i> 37. Retain earlier version of 1991. <u>Note, do NOT agree with NCUTCD recommendation of many documents proposed for deletion—as this seemed rushed.</u></p>
1A.06	YES			Agree overall.
1B.01	YES			Agree overall.
1B.02		YES		<p>Agree overall. However:</p> <p>Please delete the added Standard in lines 14 – 16 on page 8 that states, “policies, directives, specifications, standard drawings, or similar documents related to traffic control devices that are issued by an agency shall be considered as supplements to the MUTCD and shall be in substantial conformance with the National MUTCD.” This is problematic.</p>
1B.03		?/YES		<p>Agree overall except for the followin</p> <p><u>Question:</u> should line 42 say: “Unless a particular device remains serviceable, non compliant devices...shall be brought into compliance....” This change is recommended.</p> <p>Also, the Option on lines 22-24 should be retained.</p>
1B.04	YES			Agree.
1B.05	YES			Agree.
1B.06		YES		<p>Agree overall and with the goal of overall and national UNIFORMITY and the importance of that, except:</p> <p>Lines 41 on page 10- Line 8 on page 12, should be a “should” vs. shall. As it is and realistically, agencies do not typically have the resources to engage in this extensive of a process, which leads to, potentially more non-compliant devices being used anyway because the needs to progress, especially in bicycle infrastructure areas, are vast. The experimentation process is currently too arduous.</p> <p>Several of the proposed modifications in the NCUTCD recommendations for this section may help. However, this process remains problematic. In reading this section, most would be deterred from even venturing into experimentation! Lines 6-7 on page 11 in addition to Lines 34-42 should be deleted. In working for a governmental agency, the last thing we need is additional reporting/bureaucracy—it is way too much and not at all realistic. No disrespect to those who mean well to ensure uniformity, however this goes way too far. References in Lines 14-33 on Page 11 to agreements, also go too far and should be deleted. Given what happened with the RRFBs, we completely understand and agree with the need for lines 50 on Page 11 through Line 8 on Page 12.</p> <p>Line 17, page 12, need to change the first period to a space so “protected.by” becomes “protected by”</p>
1B.07	YES			Agree overall.

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1B.08		YES		<p>Agree overall, except: Lines 20-37 on Page 13 should be a “should” for similar reasons as provided in 1B.06. Similarly, Lines 42-51 on Page 13 and Lines 1-2 on Page 14 should be a “should.” Lines 1 & 2 on page 14 – it appears the word “and” is missing. It should read “...and shall furnish this information to the State.”</p>
1B.09	YES			Agree overall.
1C.01	YES			Agree.
1C.02		YES		<p>Agree overall, except: <u>Definition 43</u>, Line 54, Page 17, should say “Contra” not “Counter” flow as contra is already what is widely used in the industry. This change is needed throughout the proposed manual to bring it in line with the industry. <u>Definition 44</u>: Line 12, page 18, should there be an “and” before “crash cushions”? <u>Definition 57</u>, Line 48, page 18, change the sentence from “Driving aisle provide a one-way or two-way travel” to “Driving aisles provide one-way or two-way travel.” <u>Definition 49</u>, Line 29 delete the “on the roadway surface” and it is recommended that this language not be deleted because these are often mounted on the roadway surface for bikeways and for islands, etc. <u>Definition 54</u>, Please note that while the definition is ok and when possible to convene this team, it can be very helpful and useful. However, it can be very hard to actually engage a Diagnostic Team. Given this, their authority should not be mandated when there is no guarantee that an agency can in fact, easily engage this team, despite efforts to do so. <u>Definition 106(b)</u>, “or side roadway” should be changed to say “or site roadway.” Note, if a site roadway intersects with a public roadway and has a traffic control device, indeed such devices would need to comply with the MUTCD, even if associated parking areas/driveway aisles are not required to comply. Consequently, if a site roadway of a shopping center includes parking along the main aisle into the center, that portion should be considered a site roadway, not a driving aisle. This needs to be clarified. <u>Definition 106(c)</u>, Line 41, Page 21, should it say “and there is insufficient interior storage for the design vehicle.” <u>Definition 129</u>, given that a vehicle could become stuck in the Minimum Track Clearance Distance area, it may be best to be very specific on the dimensions required for measurement vs. deleting references to the 12’ and 6’ in Lines 6 and 7 on Page 23. Similarly, the deletions in lines 12-17 might be inadvisable where that information could be very important if a crash were to occur. <u>Definition 151</u>, Line 31 on Page 24, not sure why the pathway cannot include sidewalk. It is recommended that the language on Line 31 of Page 24 says: “Pathways include shared-use paths, but do not include sidewalks.” The portion that says “but do not include sidewalks should either be deleted or clarified to say: “but do not include intersecting sidewalks approaching a roadway.” In some jurisdictions, PCC/sidewalk might be utilized instead of AC for a Pathway (or other material) and yet the intent of the pathway is the same even though not AC. The actual surface is not a TCD issue and therefore should not be a part of the definition in any manner. Maybe instead say: “but may or may not include the sidewalk area.” However, since by definition a Pathway can include a “shared-use path,” shared use paths can include pedestrians. As a result, references to the sidewalk not being a part seem odd. Definition</p>

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			<p>211 specifically references that pedestrians, skaters, joggers, etc., can use a shared-use path.</p> <p><u>Definition 236</u>, Lines 26-33, Page 29, should be updated to say on Lines 32-33: "Site roadways open to public travel do not include parking areas or driving aisles except where they are within the main site roadway entrance into the shopping center (etc.) and where the entry site roadway intersects with a main roadway is controlled with traffic control device(s). In such circumstances, the site roadway's main entrance to the facility open to public travel, with or without parking along this site roadway, is included within the MUTCD's jurisdiction."</p> <p><u>Definition 238</u>, Lines 36-46 on Page 29 should also include approach speed and prevailing speed and must continue to include the 85th Percentile and Operating Speed references. Although there are outside pressures to delete these terms from the MUTCD and other key ITE and other professional documents, it is inappropriate and unsafe to do so. Under the timeline pressures to complete review of the NPA, the NCUTCD acted quickly to change references to the 85th percentile from a SHALL to a Support statement. This was very surprising and will further adversely exacerbate the Traffic Engineer/Practitioner's important task and ethical duty to facilitate the proper setting of speed limits without the strength of this critical value being required. This is offered from a jurisdiction that has had to explain to the public why we need to modify speed limits and has done so successfully. The FHWA/USDOT has an extremely high duty to not follow that recommendation from the NCUTCD. To do so will make it even harder for practitioners to set safe and credible maximum speed limits which will result in potential safety implications (see Exhibit 1 for further examples). The FHWA and USDOT have a high duty to stay strong on this point regardless of outside pressures in the interest of safety, equity and social justice. We do not need additional reasons for unnecessary traffic stops, especially in communities where many already are and/or feel disenfranchised. Also see Exhibit 1 which is included a part of these comments.</p> <p><u>Definition 242</u>, Lines 52-53, Page 29: it is unclear why the portion that says: "but which might be different from a legislatively specified statutory speed limit." Recommend deleting the 2nd half of this sentence from the comma to the end so that it ends after the word "regulation."</p> <p><u>Definition 248</u>, Lines 12-13, Page 30, where a line is used at a stop sign, this name of this definition is intuitive. However, where this line is used at a traffic signal, it makes sense for it to be called a "limit line" instead because it is not used at a stop sign. It is recommended that this definition be re-titled to say "limit line" and that a "Stop line" be defined specific to when it is used at a stop sign.</p> <p><u>Definition 275</u>, Lines 42-45, Page 31, should also add in bicycles to remind that they are also considered vehicles.</p>
1D.01		YES	<p>Agree except for the prior MUTCD manuals had references to speeds which have since been deleted and the final piece in support is being deleted in this version on Lines 33-35 and this is not in the interest of safety of the travelling public.</p>
1D.02		YES	<p>Agree generally with the addition of: In Line 20 after the parenthesis add: "Actual conditions, based upon the roadway characteristics are important to take into account in the operation of traffic control devices."</p>
1D.03	YES		<p>Agree Generally.</p>

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1D.04		YES		Agree generally, however the Support statement on Lines 44-46, Page 36 that says: "Provisions of this Manual are based upon the concept that effective traffic control depends upon both appropriate application of devices and reasonable enforcement of the regulations." Please also add to this statement: "Traffic Control Devices that are operated in a manner that support voluntary compliance are most effective in achieving uniformity."
1D.05	YES			Agree overall.
1D.06	YES			Agree overall.
1D.07	YES			Agree overall.
1D.08	YES			Agree overall.
1D.09	YES			Agree overall.
1D.10	YES			Agree overall.
1D.11	YES			Agree overall.
1D.12	YES			Agree overall.
2A.01	YES			Agree overall.
2A.02	YES			Agree overall.
2A.03	YES			Agree overall.
2A.04	YES			Agree overall.
2A.05	YES			Agree overall.
2A.06	YES			Agree overall.
2A.07	YES			Agree overall.
2A.08	YES			Agree overall.
2A.09	YES			Agree overall.
2A.10	YES			Agree overall.
2A.11		YES		Agree overall, except : In Line 18 on Page 50, delete the " but not to exceed six months " because agencies are often short staffed and if the plaque is out there longer under an optional may statement, the agency will be out of compliance if the sign inadvertently remains out there 8 months and there is a crash, this could be unreasonably used in litigation to say that the agency was out of compliance with the MUTCD. Additionally, because it is under an Option statement, a specific time seems inappropriate to be included as there is no requirement associated with it in the first place.
2A.12	YES			Agree overall.
2A.13	YES			Agree overall.
2A.14	YES			Agree overall.
2A.15	YES			Agree overall.
2A.16	YES			Agree overall.
2A.17		YES		Agree overall, except : In Line 6, on Page 56, references to equipment should be expanded so that equipment can also be mounted above the sign because in some cases there may need to be equipment placed above, for example, directly under a solar panel. It is appropriate to ensure that there are no shadows cast or that the sign and that the sign is not obscured. The word "above" should be added in front of "below" on line 6.
2A.18	YES			Agree overall.
2A.19	YES			Agree overall.
2A.20	YES	YES		Agree overall, except in Line 26, Page 57, the importance of appropriate dimming of LEDs should be noted. In some locations, even during the day, LEDs within signs are so bright that they serve to temporarily blind drivers and obscure the most important message of the sign. The MUTCD should state something about this to recommend dimming be considered where LEDs are particularly bright.

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2A.21		YES		Agree overall, except in Line 18, Page 59 item D, should not be removed (crossed-out) as an exception because adding retro-reflectivity requirements for signs with blue and brown backgrounds, are a lower priority compared to regulatory, warning, and guide signs. Given this, they should also be a lower priority for inspection and replacement. Table 2A-3 may need to be renumbered to match the text.
2A.22	YES			Agree overall.
2B.01	YES			Agree overall.
2B.02		YES		Agree overall, except somewhere near 40 on Page 62, a support statement that notes the importance of appropriate dimming of LEDs should be provided. In some locations, even during the day, LEDs within signs are so bright that they serve to temporarily blind drivers and obscure the most important message of the sign. The MUTCD should state something about this to recommend dimming be considered where LEDs are particularly bright.
2B.03	YES			Agree overall.
2B.04	YES			Agree overall.
2B.05	YES			Agree overall.
2B.06		YES		Agree overall, except on Line 25, Page 65, the reference to 2B.04f appears incorrect.
2B.07		YES		Agree overall, except on Line 14, Page 67, Item C seems reversed in saying: "Controlling the direction that has the best sight distance from a controlled position to observe conflicting traffic." Note the contrasted statement in Line 31, Page 69, Item A that says: "A restricted view exists that requires road users to stop in order to adequately observe conflicting traffic on the through street or highway;" It seems to make an opposite type of recommendation. Is the intent to have the Stop sign or Yield sign for the approach with the less good sight distance? If so, Line 14 on Page 67 should be modified.
2B.08		YES		Agree overall, except on Line 26, Page 67, Item C should be modified to say: "Removing sight distance obstructions (or obstacles). " or "Improving sight distance."
2B.09	YES			Agree overall.
2B.10	YES			Agree overall.
2B.11	YES			Agree overall.
2B.12		YES		Agree overall, except on Line 15, Page 70, Item D, the reference to "Peak Hour Volume" is likely intended to say: "8-Hour Volume". Additionally, on Line 51, Page 70, a Support statement should be added that says something like: "All-Way Stop Controls with approximately equal approach volumes from the major and minor intersection approaches can increase the credibility of these devices for all roadway users. Conversely, All-Way Stop Controls with substantially lower traffic demand on the minor street can reduce the credibility of these devices with all roadway users."
2B.13	YES			Agree overall.
2B.14	YES			Agree overall.
2B.15	YES			Agree overall.
2B.16	YES			Agree overall.
2B.17	YES			Agree overall.
2B.18	YES			Agree overall.
2B.19	YES			Agree overall.
2B.20	YES			Agree overall.

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2B.21	NO	NO	YES	<p>FHWA and USDOT have a very important <u>duty to uphold engineering principles</u> in this section and <u>cannot be pressured by outside forces</u>, who in some cases may mean well and in other cases have an agenda to utilize future automated speed enforcement on the public for revenue generation without first ensuring that reasonable and safe drivers on <u>ALL classifications of roadways</u> are not turned into violators. Further, in light of how simple traffic stops can turn into completely escalated and dire consequences, it is even more critical that the FHWA and the USDOT stand firm in this area in the interest of protecting the most vulnerable in our society, equity and social justice.</p> <p>Further, it is NOT safer to undermine the 85th percentile or free-flowing speed distribution data. In fact, to do so contributes to <u>LESS safe roadways for ALL</u> roadway users: bicyclists, pedestrians, and drivers, in addition to transit users and construction workers based upon what follows when speed limit signs are arbitrarily lowered. Examples are provided in Exhibit A.</p> <ol style="list-style-type: none"> 1) A contractor is very unlikely to call up the traffic engineering department within a jurisdiction to find out what the 85th percentile speed. Instead, they more regularly <u>RELY</u> on the posted speed limit value to determine the length of transitions and tapers from which to place their cones, markings, concrete barriers according to what the required taper/transition length needs to actually be. <u>However, when the posted speed limit is NOT based upon speed distribution data, much can go wrong</u>. Examples include a 35 mph posted with an 85th percentile of 45 mph where the contractor will be <u>one entire football field length SHORT</u> of what is needed thereby jeopardizing the safety of all roadway users and construction workers! This is a common situation already today due to the inordinate pressure that Traffic Engineers are already under. By further weakening requirements, the Traffic Engineer will be further over-ruled and pushed around because there will be NOTHING to help encourage good practice. Instead, the FHWA and USDOT need to engage in an effective educational campaign as to <u>WHY the 85th percentile is everyone's ally!</u> 2) In passing/no passing zones on two-lane roadways, the examples are <u>600' short</u> (see Exhibit A) where common differences in the posted/statutory can easily be <u>20 mph short of what is needed</u>. Passing within the opposing direction MUST be based upon real data in the <u>INTEREST of SAFETY</u>. 3) For a Traffic Signal, the Yellow Signal Timing is critical to be sufficient as drivers approach the dilemma zone—for SAFETY reasons. Common differences between a 35 mph posted and 45+ mph 85th Percentile Speeds, result in a shortage rounded to <u>1 second</u> less yellow signal time than <u>required</u>. Meanwhile, most red-light-running occurs within the first ½ to 1 second. Knowledge of this is why automated camera companies knew they could generate revenue off of the backs of reasonable and safe drivers in so many jurisdictions. The <u>public deserves better from our profession who's priority needs to be SAFETY!</u> Physics based upon the long accepted kinematic equation have NOT CHANGED. We need to better <u>advocate</u> for why the 85th percentile speed is CRITICAL for safety rather than to be bullied and participate in the undermining of our own profession that the public depends upon all of US to get right. 4) ITE's more recent publication on Yellow Clearance intervals must continue to be referenced. It takes into account the
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				<p>kinematic equation and that in some specific cases there will be two different velocities: One speed value as you enter into the dilemma zone and a second (lower/slower) speed value at approximately the “stop bar” or limit line at the entrance to the intersection. Examples include if there is a cross-gutter for through movements, or required right or left-turning maneuvers that must be made. Where these roadway features exist and/or turning maneuvers require drivers to slow down to proceed safely, the second velocity value at the entrance to the intersection is lower/slower and needs to be considered. Please understand that Traffic Engineers and practitioners have been asked to REDUCE THE AMOUNT of yellow traffic signal time, in some cases OVERTLY with the goal to <u>INCREASE</u> the amount of red-light running and revenue in some jurisdictions. This is the kind of pressure that professionals face and why it is so important that the FHWA and USDOT, do NOT falter in their <u>critical duty</u> to NOT further weaken this section of the 2009 MUTCD which MUST retain the <u>SHALL</u> statements in Paragraphs 01-05. The former MUTCD 2009 version of the Speed Limit Sign (R2-1) must be retained and anyone who pressures otherwise can be politely reminded that it may be <i>“their daughter, son, father or mother or they themselves, who could be killed in a crash”</i> which is why the FHWA and USDOT will NOT engage in any such malpractice to remove references to critical speed distribution data due to pressure from outside entities. The FHWA/USDOT must succeed in NOT allowing other non-experts to undermine this most critical task of properly setting speed limits throughout the Country.</p> <p>5) For those who would like lower speeds, where it is appropriate to change the character of the roadway, that is the effective and responsible way to REDUCE speed on some roadways. Additionally, we have implemented several miles of new bikeways (many separated/protected), bulb-outs at intersections, roundabouts, etc., <u>and these effective tools can be used on collectors and residential streets to actually reduce speeds</u>. Studies from a neighboring City showed, and we all know, that arbitrarily changing the value on a speed limit sign does NOTHING to change human behavior, to slow drivers down, or to make the roadway safer. It is the character of the roadway that helps to self-enforce good driving behavior and we need to better message the <u>truth</u> in this area to the public and all stakeholders.</p> <p>The NTSB report does not appear to have been written by Traffic Engineering professionals and there may be agendas involved.</p> <p>While (USLIMITS2) might be useful to validate some speed limits already determined through a proper engineering and traffic survey study, it should not be a substitute for proper studies. We do not support blanket application of the "safe system approach" to speed limits in lieu of solid Traffic Engineering safety practices.</p>
2B.22	YES			Agree overall.
2B.23	YES			Agree overall.
2B.24	YES			Agree overall.
2B.25	YES			Agree overall.
2B.26	YES			Agree overall.
2B.27	YES			Agree overall.
2B.28	YES			Agree overall.
2B.29	YES			Agree overall.
2B.30	YES			Agree overall.

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2B.31	YES		Agree overall.
2B.32	YES		Agree overall.
2B.33	YES		Agree overall.
2B.34	YES		Agree overall.
2B.35	YES		Agree overall.
2B.36	YES		Agree overall.
2B.37	YES		Agree overall.
2B.38	YES		Agree overall.
2B.39	YES		Agree overall.
2B.40	YES		Agree overall.
2B.41	YES		Agree overall.
2B.42	YES		Agree overall.
2B.43	YES		Agree overall.
2B.44	YES		Agree overall.
2B.45	YES		Agree overall.
2B.46	YES		Agree overall.
2B.47	YES		Agree overall.
2B.48	YES		Agree overall.
2B.49	YES		Agree overall.
2B.50	YES		Agree overall.
2B.51	YES		Agree overall.
2B.52	YES		Agree overall.
2B.53	YES		Agree overall.
2B.54	YES		Agree overall and the “Begin” and “End” word messages in association with parking signs have been found to be understandable to the public vs. having to post signs at a 45 degree angle in effort to communicate the meaning of a double-headed arrow for parking areas.
2B.55	YES		Agree overall.
2B.56	YES		Agree overall.
2B.57	YES		Agree overall.
2B.58	YES		Agree overall.
2B.59		YES	Agree overall, however, this sign promotes the act of requiring a bicyclist to change modes and to become a pedestrian at a traffic signal for example, rather than to provide bicycle signals and bicycle detection for the bicyclists. Imagine if we asked drivers to exit their vehicles, to push a button, rather than to actually design and operate for them and to provide video and/or loop detection for drivers. While we transition to more bicycle infrastructure and newer bicycle signal faces, it will take time to be able to update detection and infrastructure to accommodate the bicycle roadway user. However, it is important to draw attention to that at this time, in many cases, we are asking for the bicyclist roadway user to actually switch transportation to modes while travelling.
2B.60	YES		Agree overall.
2B.61	YES		Agree overall.
2B.62		YES	Agree overall, except , that Lines 16-19 on Page 110 must be a “SHALL” requirement to ensure that drivers are aware of automated photo enforcement locations.
2B.63	YES		Agree overall.
2B.64	YES		Agree overall.
2B.65	YES		Agree overall.
2B.66	YES		Agree overall.
2B.67	YES		Agree overall.
2B.68	YES		Agree overall.
2B.69	YES		Agree overall.
2B.70	YES		Agree overall.

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2B.71	YES			Agree overall.
2B.72	YES			Agree overall.
2B.73	YES			Agree overall.
2B.74	YES			Agree overall.
2B.75	YES			Agree overall.
2B.76	YES			Agree overall.
2B.77	YES			Agree overall.
Part 2C-2K	N/A	N/A	YES	Generally agree with the NCUTCD recommendations.
Part 3	N/A	N/A	YES	Generally agree with the NCUTCD recommendations.
Part 4	NO	NO	YES	<p>1) Generally agree with the Joint Task Force STC/BTC recommendations which largely made it through to the NCUTCD as well, with a few exceptions.</p> <p>2) Do not agree with the proposed deletion in Part 4H of reference to ITE's Yellow Clearance Interval Document or the other changes to the signal timing for yellow lights--that should be retained within Part 4H based upon FHWA's NPA document.</p> <p>3) Do not agree with statement that Bicycle Signals shall not be used at PHBs and instead should be required to change to pedestrian mode at the PHB instead of providing them indications--unreasonable. Please see Exhibit B for how Bicycle Signals can be appropriately phased at PHBs for side paths, trails, shared-use paths, etc., that intersect with roadways. Much work was achieved with the Joint Task Force for STC/BTC and this collaborative effort is worth sharing with the FHWA for consideration. As referenced earlier, it is inappropriate NOT to provide bicycle signal indications for the bicyclist roadway users and references to studies cited did not show BICYCLE-related crash history in Portland, OR, instead there were other rear-end crashes on the roadway in general.</p>
Part 5	NO	NO	YES	Agree with the NCUTCD's recommended changes from guidance to support through-out this section—please reference the NCUTCD document for this section.
Part 6	N/A	N/A	YES	Generally agree with the NCUTCD recommendations.
Part 7	N/A	N/A	YES	Generally agree with the NCUTCD recommendations.
Part 8	N/A	N/A	YES	Generally agree with the NCUTCD recommendations.
Part 9	N/A	N/A	YES	Generally agree with the NCUTCD recommendations.