



# Naperville

May 7, 2020

Docket Management Facility  
U.S. Department of Transportation  
1200 New Jersey Ave. SE, West Building Ground Floor, Room W12-140  
Washington, DC 20590-0001

Subject: Docket No. FHWA-2020-0001, National Standards for Traffic Control Devices

The City of Naperville Transportation, Engineering and Development Business Group offers the comments below pertaining to the proposed rulemaking for the National Standards for Traffic Control Devices.

*Section 3A.04, Functions, Widths and Patterns of Longitudinal Pavement Markings*

The proposed revisions provide a new Standard requiring 6-inch edge lines on all roadways above 40 MPH. While the safety benefits are valuable, we encourage that an option be included to use a 4 to 6-inch normal width line when the lines are optional to begin with.

*Section 4C.08, Warrant 7, Crash Experience/Table 4C-2*

The NCHRP report that is the basis of the revised crash warrant does not fully evaluate the safety benefits of various types of left turn signal operation. The NCHRP report recommends further study of left turn crashes in its conclusion. As left turn crashes frequently involve injuries, recommend including left turn crashes in the warrant analysis until further research is completed.

*Section 4D.04, Number of Signal Faces on an Approach/Figure 4D-1*

It would be helpful to have an additional figure for the protected/permissive left-turn condition to supplement the special (\*) note and provide clarity on head placement and guidance to provide one signal head per lane, centered on the lane.

*Section 4I.05, Pedestrian Detectors/Figure 4I-2*

The preferred area may be difficult to achieve based on varying site conditions (i.e. utilities, topography, ADA considerations, street furniture, etc.). It would be helpful to note that the dimensions should be achieved to the extent feasible for site conditions.

*Section 4S.03, Warning Beacons/Figure 4L-1*

Guidance on the duration that the beacon should be activated when actuated by pedestrians or bicyclists at mid-block/trail crossings should be provided.

In addition to these issues, there were several cross-reference and grammatical errors we did not include in our comments. We trust FHWA will complete a rigorous quality control process to ensure these errors are resolved in the final version.

Sincerely,

Andy Hynes, P.E., P.T.O.E.  
Deputy City Engineer

Jennifer Loudon, P.E.  
Deputy Director