

May 5, 2021

To: Federal Highway Administration
Re: Proposed revisions to the Manual on Uniform Traffic Control Devices for Streets and Highways

In addition to the comments detailed in the COMMENTS SECTION, BrightRidge believes these are **unacceptable changes** the FHWA has proposed to the MUTCD, with reasoning and examples detailed on each change:

- "Alternative Fuel stations will be prohibited from using Specific Service signs unless they are also a gasoline station." *As such, the only transportation fueling station permitted to display their logo on a highway sign will be a gasoline station. How will an EV driver know there is a charging station available if a gasoline station chooses not to include such in the sign?*
- "Alternative fuels can only be listed on specific service signs as a supplemental message along the bottom of a gasoline station logo sign panel." *For example, a gasoline station could indicate on their GAS sign logo they have propane autogas or electric vehicle charging available; but a standalone, non-gasoline vehicle fueling station has no way to include their logo on a sign. This would mean that a community-based EV charging station could not have a sign. This is not an equal treatment and seems that the FHWA is supporting gasoline stations over community or utility supported EV charging stations.*
- "Categories of businesses other than gasoline stations with logo signs (FOOD, LODGING, ATTRACTION) will be prohibited from including a supplemental message indicating they offer an alternative fuel." *For example, a coffee shop will be prohibited from adding a supplemental message on the FOOD sign indicating they have EV charging available at their location. Likewise, a hotel would be unable to indicate on the bottom of their sign they offer EV charging. If the FHWA only allows gasoline stations to indicate EV charging, is that equal treatment to other entities offering the same charging?*
- "Signing for alternative fueling stations will only be permitted using General Service signs." *This is against the wishes of many states that would prefer to sign for alternative fueling stations using Specific Service signs.*
- It is understandable and appropriate that the FHWA proposal designates that Alternative Fuels Corridor sign(s) shall only be installed on highways officially designated as Alternative Fuel Corridors. *States should be allowed to use the Alternative Fuels Corridor sign for the sole purpose of raising corridor awareness (in a manner consistent with what FHWA published in the federal register in 2016) without the requirement of directional signage being installed first.*

I'm sure my comments are similar to many other entities from Tennessee, but I hope FHWA will consider these as they finalize the MUTCD. Again, thank you for allowing public comment.

Sincerely,

Bonnie F. Donnolly
Chief Development & Market Strategy Officer

Submitted electronically as an attachment on Regulations.gov