



Department of Transportation

Henry B. Gutman, Commissioner

May 14, 2021

Stephanie Pollack
Acting Administrator
U.S. Department of Transportation
Federal Highway Administration
1200 New Jersey Avenue, SE
Washington, DC 20590

Dear Administrator Pollack:

The New York City Department of Transportation (NYCDOT) hereby submits the following comments on the Proposed Rule by the Federal Highway Administration (FHWA) on the National Standards for Traffic Control Devices: Manual on Uniform Traffic Control Devices for Streets and Highways (MUTCD); Revision.

While NYCDOT is providing these extensive specific comments on the current MUTCD draft, we support the call for FHWA to reframe and rewrite the Manual in a more limited way, with a focus on safety, and leaving room for flexibility and innovation at the state and local level, along the lines of the comments submitted by the National Association of City Transportation Officials (NACTO). We urge FHWA to take these comments in full as they embark on the process of finalizing the 11th edition of the MUTCD.

In addition to this update, NYCDOT supports the call to expand the transparency and inclusivity of its process for reconciling comments and also commit to a more timely process for future updates. This process should include all relevant stakeholders, and be fundamentally informed by a safe systems approach that considers data while also leaving room for local innovation.

The MUTCD can be a powerful tool to help the Biden Administration meet its ambitious goals around climate and equity, while ensuring safety for all road users. If enacted, the recommendations in this letter will help transform the MUTCD into a document that can advance these causes. We thank you for your thoughtful consideration of these comments and look forward to working with you on both the immediate updates, and ongoing collaborative efforts.

Sincerely,

A handwritten signature in black ink, appearing to read "Eric Beaton".

Eric Beaton
Deputy Commissioner, Deputy Commissioner
Transportation Planning and Management