

January 28, 2021

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

Re: Request Extension of Commenting Period for Docket No. FHWA-2020-0001

Dear Acting Administrator Pollack,

The Intelligent Transportation Society of America (ITS America) endorses the request by the National Committee on Uniform Traffic Control Devices (NCUTCD) and other organizations to extend the comment period from 90 days to 180 days for the Notice of Proposed Amendments (NPA) that will ultimately result in the 11th edition of the Manual on Uniform Traffic Control Devices (MUTCD).

As the trade association representing stakeholders across the transportation sector, including state, city, and county departments of transportation, metropolitan planning organizations, automotive manufacturers and suppliers, technology companies, engineering firms, and research universities, ITS America advocates for transportation technology solutions that make our transportation system safer, greener, and smarter. Much of that effort is impacted by the guidance and standards established in the MUTCD, particularly as it pertains to novel traffic control devices and applications and automated driving systems. Given the importance of these standards on transportation innovation, ITS America follows this proceeding with great interest.

To that end, ITS America supports requests to extend the comment deadline for this proceeding submitted by organizations such as NCUTCD, which have identified precedent for providing a comment period of 180 days for these proposed revisions. ITS America agrees that the additional time will allow for greater consensus-building among transportation safety stakeholders, and that 180 days is more reflective of MUTCD revision efforts in previous proceedings. ITS America respectfully requests that the Federal Highway Administration (FHWA) extend the comment period for this NPA from 90 days to 180 days.

We appreciate your consideration of this request. If you would like to discuss this matter further, please contact me at tdrake@itsa.org.

Sincerely,

Timothy Drake

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Vice President, Public Policy and Regulatory Affairs

ITS America