

April 1, 2021

Honorable Nicole Nason  
Administrator Federal Highway Administration  
U.S. Department of Transportation  
1200 New Jersey Avenue S.E.  
Washington, D.C. 20590

Re: Comments for Docket No. FHWA-2020-0001  
Notice of Proposed Amendment (NPA) on the Manual on Uniform Traffic Control Devices (MUTCD)

Administrator Nason:

On behalf of the Greater Pittsburgh Chamber of Commerce, the advocacy affiliate of the Allegheny Conference on Community Development, thank you for the opportunity to submit comments to Docket No. FHWA-2020-0001: Notice of Proposed Amendment (NPA) on the Manual on Uniform Traffic Control Devices (MUTCD). The Greater Pittsburgh Chamber is a regional organization in southwestern Pennsylvania that is committed to improving the Pittsburgh region's economic future and quality of life. We have many members that are industry-leading experts in advancing technology and innovation to support a safe and sustainable transportation, infrastructure, and mobility path for all. As such, policies such as those included in the MUTCD are of great interest to our region.

The Chamber appreciates the work done by the Federal Highway Administration on the proposed 11th edition on the MUTCD. Specifically, we applaud the FHWA's proposed updates to the MUTCD, emphasizing the need to improve roadway safety and begin to prepare roadways for vehicle automation systems. In this regard, we appreciate the opportunity to offer the following comments.

With autonomous vehicles being one of the most significant transformations in the transportation space, there is need for advanced coating technologies. For example, road markings serve as either a primary or secondary guide in all vehicle automation system technologies. These markings must deliberately provide consistent and clear delineation of intended vehicle paths. We fully support the FHWA's emphasis to tighten uniformity of national road marking standards to support automated vehicle deployment.

More specifically, we support the following proposed changes to the MUTCD, all designed to tighten national uniformity to improve roadway safety and begin to prepare roadways for vehicle automation systems:

- Using 6-inch wide markings on interstates, freeways, and expressways (320),
- Using 6-inch wide edge lines on conventional two-lane highways (320),
- Using dotted edge lines along exit and entrance ramps (327),
- Placing chevron markings in gore areas (340), and
- Eliminating the use of intermittent markings as a substitute for continuous markings (333).

These proposals will enable driver assistance and fully automated vehicle systems to address the most common fatal crash type in the US, single vehicle lane departures. These crash types can be reduced by as much as 66 percent, depending on technology adoption rates and roadway readiness levels.<sup>1</sup>

In addition to the benefit these proposals provide in support of machine vision systems, the proposed MUTCD changes to tighten uniformity of national road marking standards have also been shown to reduce single vehicle lane departures on two-lane highways for human-led vehicles.<sup>2</sup> In the FHWA study where data were analyzed from three states that adopted 6-inch wide edge lines, total lane departure crashes were reduced 15 to 30 percent, while fatal and serious injury crashes were reduced 15 to 37 percent.

Overall, the Chamber supports the adoption of the 11th edition of the Manual on Uniform Traffic Control Devices (MUTCD).

Thank you in advance for your consideration of the above comments. Thank you.

Sincerely,



Matt Smith  
President, Greater Pittsburgh Chamber of Commerce

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<sup>1</sup> Penmetsa, P., Hudnall, M., and Nambisan, S. (2019). Potential safety benefits of lane departure prevention technology. *International Association of Traffic and Safety Services Research*, 43(1), pp. 21–26.

<sup>2</sup> Report [FHWA-HRT-12-048](https://www.fhwa.dot.gov/publications/research/infrastructure/pavements/12048/12048.pdf)

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