

Comments on Docket No. FHWA-2020-0001 National Standards for Traffic Control Devices; the *Manual on Uniform Traffic Control Devices for Streets and Highways*; Revision

Please use this form to provide comments on the Notice of Proposed Amendments for the MUTCD.

INSTRUCTIONS:

1. Add your name or organization name where indicated in the footer of this form.
2. Use Table 1 to provide your original comments.
3. Use Table 2 to indicate your agreement with a comment that another commenter has submitted to the docket.
4. Do not adjust formatting of the rows and columns; text will automatically wrap and expand the row height as you type.
5. To add rows to this form, use the "Insert Rows" function, or hover just outside the left edge of the row below which you would like to add a row and click the encircled "+" that appears.
6. If you choose to provide a letter to accompany this comment form, please **print the document as a PDF; please do not scan a hard copy**. This will assist FHWA with cataloging your comments.

TABLE 1. ORIGINAL COMMENTS ON PROPOSED CHANGES. Please indicate the applicable proposed Section numbers in the far-left column. In the next three columns, please indicate your agreement, disagreement, or whether the column is applicable to your response by placing a, "YES," "NO," or "N/A" in the appropriate column of the row. If you agree with a proposed change, then there is no need to fill out the additional columns beyond the first two. However, it can be helpful to explain why you agree with a proposed change based on your objective experience as a roadway operator and/or empirical data. If you disagree in part or in whole, then please provide additional information that FHWA may find helpful.

Proposed Section Number(s)	Agree with concept and text as proposed	Agree with concept; suggested rewording of text in Comments	Disagree with concept	Comments <i>Please include justification for your position based on objective experience and empirical data. If there is a specific statement with which you take exception, please provide the Page and Line numbers from the mark-up version of the proposed MUTCD text.</i>
All				See other file submitted to docket which shows detailed recommended changes to the draft MUTCD text, figures, and tables.
Parts 1-9 (General)	NO	YES	N/A	NCUTCD agrees with the reorganization of the Parts of the MUTCD as presented in the NPA. NCUTCD also agrees with the new format for names of specific traffic control devices, using upper-case letters. NCUTCD notes that this new format for names has been inconsistently applied throughout the NPA text, and requests that this be rectified. Also, NCUTCD has the following recommendations regarding the upper case format: <ol style="list-style-type: none"> 1. That the upper case letter format be used for both word message legends and symbol legends; and 2. That when the upper case letter format is being used for signs (or pavement markings) that have both word message legend and symbol legend variants, the word "symbol" be used in the sign description, as in the following example: "The NO PEDESTRIANS (R9-3) symbol sign may be used to prohibit pedestrians from crossing a roadway at an undesirable location or in front of a school or other public building where a crossing is not designated. The NO PEDESTRIAN CROSSING (R9-3a) word message sign may be used as an alternative to the R9-3 symbol sign."
Part 1 (General)	YES	N/A	N/A	NCUTCD agrees with the reorganization of Part 1 into 4 new Chapters and incorporation of material from the current Introduction as presented in the NPA.

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1A.01	NO	YES	N/A	NCUTCD generally agrees with 1A.01 as presented in the NPA, but recommends an editorial revision to relocate the objective “D” regarding promoting safety and efficiency to the top of the list of objectives, and adding the phrase “of all road users”. While we recognize that the list is not intended to be a ranked priority, we believe that safety is the most significant objective and moving it to top of the list sends a subtle, but significant message to users of the MUTCD. Also, NCUTCD recommends the insertion of the phrase “the user of the Manual has” in the final paragraph for clarity.
1A.02	NO	YES	N/A	NCUTCD generally agrees with 1A.02 as presented in the NPA, including the addition of new item F, but recommends revision of the Section title from “Traffic Control Devices - Definition” to “Traffic Control Devices - General Description and Purpose”, to avoid confusion with the actual definitions that are consolidated in Section 1C.02. NCUTCD also recommends relocation of a portion of the text shown in the NPA as the Section 1C.02 definition of Traffic Control Device” to Section 1A.02 as Support text, because it is information that is beyond what could be considered as a definition (Please see also NCUTCD comments on Section 1C.02 regarding insertion within the definition of a reference to Section 1A.02.)
1A.03	N/A	N/A	YES	NCUTCD recommends entirely deleting 1A.03 as presented in the NPA. NCUTCD agrees that the language is consistent with the 2012 MUTCD Strategic Plan; however, it does not necessarily belong in the MUTCD itself. It is counterintuitive to suggest that the Target Road User is “alert and attentive,... and is operating in a lawful manner...” when there are provisions in the MUTCD that are specifically included for road users that are just the opposite. This includes measures to enhance sign conspicuity, most warning signs, RRFBs, PHBs, and many other devices and treatments. Either those items do not belong in the MUTCD or the Target Road User is the person, persons, or machine that warrant such traffic control devices. Please also note that proposed Section 1D.01 Purpose and Principles of Traffic Control Devices includes Guidance that “The proper use of traffic control devices should provide the reasonable and prudent road user with the information necessary to efficiently and lawfully use the streets, highways, pedestrian facilities, and bikeways.” The concept of ‘target road user’ is captured in that statement and is not needed here.
1A.04	NO	YES	N/A	NCUTCD generally agrees with 1A.04 as presented in the NPA, but recommends several minor editorial revisions.

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1A.05	NO	YES	N/A	<p>NCUTCD recommends revising 1A.05 as follows. We base these recommendations on the following criteria for listing as developed by NCUTCD:</p> <ol style="list-style-type: none"> 1. Addresses only items that meet the definition of a traffic control device as defined by the Manual. 2. Is the most appropriate reference to supplement the MUTCD by providing additional background information to assist in device application and bridge gaps between Manual provisions and field decisions. 3. Augments the Manual by providing information, data collection, considerations, and criteria needed to exercise engineering judgment or prepare an engineering study. 4. Enables smaller jurisdictions to implement Manual requirements without special training, seeking other information sources or engaging a Consultant. 5. Introduces the application of new technology or newer devices for national implementation. 6. Deals with traffic control devices on the roadway, walkway, path, railway, airports, transit, parking facilities, private property or other transportation facilities. 7. Publication is based on significant research approved by peers, or multiple field applications with documented effectiveness or an authoritative source. 8. Has been reviewed by one or more of the NCUTCD Technical Committees and recommended for listing as a reference.
1A.05 (continued)	NO	YES	N/A	<p>NCUTCD recommends adding the following publications to 1A.05:</p> <ul style="list-style-type: none"> • “AASHTO Transportation Glossary (Highway Definitions),” 2009 Edition (American Association of State Highway and Transportation Officials - AASHTO) - add because the document is referenced in Section 1C.02. • “LRFD Specifications for Structural Supports for Highway Signs, Luminaries and Traffic Signals”, 6th Edition, 2015, 2017, 2019 Interim Revision, AASHTO - add, as this document is consistent with Item 8 of this list for traffic signal heads and their supports. • “Standard Specifications for Reflective Sheeting for Traffic Control”, ATSM D4956-19, 2019 • “Urban Bikeway Design Guide” 2nd Edition 2014 (NACTO)

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1A.05 (continued)	NO	YES	N/A	<p>NCUTCD recommends revising the references to the following publications:</p> <ul style="list-style-type: none"> • “American National Standard for High-Visibility Public Safety Vests (International Safety Equipment Association—ISEA) - reference latest adopted edition (2020). • “A Policy on Geometric Design of Highways and Streets,” (American Association of State Highway and Transportation Officials—AASHTO - reference latest adopted edition (2018). • “Highway Capacity Manual, Sixth Edition: A Guide for Multimodal Mobility Analysis,” (TRB) - reference latest adopted edition (6th Edition, 2016). • “Maintaining Traffic Sign Retroreflectivity,” 2013 Edition (FHWA) - replace with “Methods for Maintaining Traffic Sign Retroreflectivity, FHWA-HRT-08-026, November 2007, as as it is more comprehensive than the 2013 document, which is merely a 4-page fact sheet. • “Manual for Assessing Safety Hardware,” (AASHTO) - reference latest adopted edition (2016). • “NEMA Standards Publication TS 4-2010 2016 Hardware Standards for Dynamic Message Signs (DMS) With NTCIP Requirements,” (National Electrical Manufacturers Association—NEMA) - reference latest adopted edition (2016). • “Pedestrian Traffic Control Signal Indications--Light Emitting Diode (LED) Pedestrian Traffic Signal Modules,” (ITE) - reference latest adopted edition (2011). • “Recommended Practice for Design and Maintenance of Roadway and Parking Facility Lighting, Practice for Roadway Lighting,” ANSI/IES RP-8 (Illuminating Engineering Society—IES, and American National Standards Institute - ANSI) - reference latest adopted edition (2018). • “Recommended Practice for Preemption of Traffic Signals Near Railroad Crossings,” (ITE) - reference latest adopted edition (2021). • “Highway-Rail Crossing Handbook,” (FHWA) - reference latest adopted edition (2019). • “Signal Timing Manual Second Edition (NCHRP Report 812) - reference latest adopted edition (2015). • “2010 ADA Standards for Accessible Design,” US Department of Justice - reference latest adopted edition (2010). • “Traffic Engineering Handbook,” (ITE) - reference latest adopted edition (2016).
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1A.05 (continued)	NO	YES	N/A	<p>NCUTCD recommends deleting the following publications:</p> <ul style="list-style-type: none"> • “AAA School Safety Patrol Operations Manual,” 2006 Edition (American Automobile Association-AAA) - delete as it does not describe how or when to erect traffic control devices nor does it offer guidance about the operation of devices. • “Guide to Metric Conversion,” 1993 Edition (AASHTO) - delete because the metric system no longer applies to the MUTCD. • “Guidelines for Accessible Pedestrian Signals (NCHRP Web-Only Document 117B),” 2008 Edition (TRB) - delete because this document has been superseded by “(Proposed) Public Rights-of-Way Accessibility Guidelines”. • “Guidelines for Determining Traffic Signal Change and Clearance Intervals: A Recommended Practice of Institute of Transportation Engineers,” 2020 (Institute of Transportation Engineers – ITE) - delete because NCUTCD recommends deleting this as a reference in Part 4, because no State has adopted it, because many questions have been raised about the reasonableness of the equation for calculating values for turning movements, and further research is planned to consider revisions to the policy. • “LRFD Movable Highway Bridge Design Specifications,” 2007 Edition (AASHTO) - delete because this document is scheduled to be revised through NCHRP in 2021 and this edition would no longer be current at the time of Final Rule. • “Manual of Traffic Signal Design,” 1998 Edition (Institute of Transportation Engineers—ITE) - delete as it is out of date and not referenced in Part 4. • “Purchase Specifications for Flashing and Steady Burn Warning Lights”, 1981 Edition (ITE) - deleted in NPA. • “Recommended Procedures for the Safety Performance Evaluation of Highway Features,” (NCHRP Report 350), 1993 Edition (TRB) - delete as this document has been replaced by the 2016 edition of the AASHTO Manual for Assessing Safety Hardware (MASH), item #16. • “Traffic Engineering Metric Conversion Folders—Addendum to the Guide to Metric Conversion,” 1993 Edition (AASHTO) - delete because the metric system no longer applies to the MUTCD. • “Traffic Signal Lamps”, 1980 Edition (ITE) - deleted in NPA. • “Travel Better, Travel Longer: A Pocket Guide to Improving Traffic Control and Mobility for Our Older Population (FHWA-OP-03-098),” 2003 Edition (FHWA) - delete as it is out of date and not referenced in the MUTCD.
1A.05 (continued)	NO	YES	N/A	NCUTCD also recommends revising the last Standard statement to avoid misinterpretation as to which resource is being revised.
1A.06	NO	YES	N/A	<p>NCUTCD recommends revising 1A.06 since the Uniform Vehicle Code, historically published by the National Committee on Uniform Traffic Laws and Ordinances (NCUTLO) has not been revised since 2000 and that NCUTLO no longer exists as an organization and thus has no plans to keep it maintained. NCUTCD notes the important relationship between uniform rules of the road and uniform traffic control devices and has committed to revise, update, and publish the UVC “Rules of the Road,” the portion of the UVC that deals with road user behaviors in compliance with traffic control devices. The recommended changes to this section reflect this commitment by NCUTCD.</p>