



**Association for Education and Rehabilitation of the Blind and Visually Impaired**

May 7, 2021

Stephanie Pollack Acting Administrator (HOA-1)  
Federal Highway Administration  
1200 New Jersey Avenue, S.E.  
Washington, DC 20590

Re: Association for Education and Rehabilitation of the Blind and Visually Impaired (AER)  
Comments on Notice of Proposed Amendment for Proposed 11th Edition of the Manual on  
Uniform Traffic Control Devices (MUTCD)

Dear Acting Administrator Pollack:

The Association for Education and Rehabilitation of the Blind and Visually Impaired (AER) is a professional organization, encompassing multiple professions within the field of blindness and is organized into divisions such as the Orientation and Mobility (O&M) Division, of which the Environmental Access Committee (EAC) is a part. O&M Specialists teach blind adults and children to travel with greater independence. The EAC's mission is to monitor changes in the built environment and advocate for solutions that provide continued and improved access to the public rights of way for people who are blind and visually impaired. One member of the Environmental Access Committee, Dr. Billie Louise Bentzen, also sits on the Signals Technical Committee of the NCUTCD, and other members have provided input on access for visually impaired people to the National Committee for many years.

AER appreciates the opportunity to provide comments on this NPA. The comments attached were developed by people who teach individuals who are blind to travel in the Public Right of Way (PROW) and researchers in our field. The comments summarized below are a subset of this input and focus largely on high level issues of greatest importance and impact, and supplement the detailed comments made individually by EAC members.

Many of the proposed changes in this version impact issues that are of concern to individuals who are blind or who have low vision and to us, as the professionals in this field. Some members of the O&M Division's Environmental Access Committee (EAC) of the Association for the Education and Rehabilitation of Blind and Visually Impaired have reviewed the extensive document and changes and our overwhelming theme is to safeguard accessibility for blind and visually impaired road users.



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### **Part 3: New Crosswalk Markings**

We are deeply concerned about the accessibility or lack thereof for pedestrians who are blind with the potential implementation of new colors and textures within the crosswalk markings and concerned that the revised terms used for crosswalk markings are not clear and understandable.

### **Part 4: Signals - Accessible Pedestrian Signals**

There are some changes related to accessible pedestrian signals (APS) that we strongly support or where we have minor changes to suggest, such as an updated and more accurate graphic about the location of pedestrian pushbuttons (and APS) and a clarification of how audible beaconing should be provided, based on research results.

Other changes that we had hoped to see have not been made! First and foremost, this new edition of the MUTCD still does not require accessible pedestrian signals (APS) where pedestrian signals are installed. With the advances in the complexity and variability of signals, we are advocating, as we did in our 2009 Manual comments, for APS at all pedestrian signals.

We understand that the MUTCD, like the ADA, does not require immediate changes to facilities but would require future installations and renovations to include APS. Currently, many cities are installing signals that are intended to make intersections safer for pedestrians, such as Leading Pedestrian Intervals (LPI) and Exclusive Pedestrian Phases (EPP), that make traditional orientation and mobility techniques obsolete because they provide the pedestrian walk signal before vehicles begin moving parallel to the crosswalk. In the appropriate sections of this complex document the Environmental Access Committee is advocating strongly for the principle of equivalent information where pedestrian signals are implemented, especially at LPIs and EPPs.

### **Part 5:AV**

We were surprised and disappointed that the word 'pedestrian' did not come up in a search of the new Section 5 on Connected and Autonomous vehicles!

In response we would like to quote from the letter to the docket sent by the Institute of Traffic Engineers. "We commend FHWA on proactively developing initial MUTCD content focused on traffic control device provisions needed support automated vehicles (AVs), recognizing that this is an evolving area that will continue to change.... We would caution that much more needs to be understood about how automated vehicles will safely interact with pedestrians, bicycles, and other vulnerable road users and that the evolving AV guidance needs to focus as much on the safety of these users as on the operation of the automated vehicles themselves."



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We join in this wise recommendation to FHWA and add that the Environmental Access Committee believes that it is of critical importance that road design that safeguards all pedestrians be of concern from the ground up as we plan for a future with Connected and Automated Vehicles. The interaction, and more importantly the recognition of pedestrians when they are in close proximity to AV is critical. Furthermore, as technology evolves pedestrians with visual impairments must be able to recognize and identify the proximal location of autonomous vehicles.

### **Part 6 Temporary Traffic Control**

We support many of the changes to the language and graphics regarding temporary traffic control (TTC) barriers and audible information devices.

We hope that the FHWA considers these robust suggestions and recommendations with the intention of creating an accessible, vibrant, and inclusive built environment.

Thank you for your time and consideration.

Sincerely,

Mark Richert  
Interim Executive Director