

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>
2J – ALL				Please see our correspondence submitted to the docket which further details our positions on NPA Items #283-#291 and the draft revisions to the MUTCD of Chapter 2J.
2K – ALL				Please see our correspondence submitted to the docket which further details our positions on NPA Items #292-#294 and the draft revisions to the MUTCD of Chapter 2K.
2J.02	NO	NO	YES	<p>We agree with the portion of paragraph 1 of NPA Item #285 and the new language as shown in Section 2J.02 of the marked up version of the MUTCD prohibiting the display of distance information on the mainline Specific Service signs.</p> <p>We oppose paragraph 3 of NPA Item #285 and any changes which would result from this statement, both those shown in the marked-up version of the MUTCD and those not shown.</p> <p>We oppose paragraph 4 of NPA Item #285 and the changes shown in the marked-up version of the MUTCD limiting ATTRACTION Specific Service signs to no more than 4 business identification sign panels. Specific Service Signs often serve as reinforcement or confirmation of an available service or attraction to a motorist as much as identification of available services or attractions. Many transportation agencies promote the use of ATTRACTION signing to eliminate sign clutter and consolidate signing for some locations that otherwise might be signed on stand-alone supplemental guide signs.</p> <p>We have included specific language in our attached correspondence we recommend revising and/or striking in 2J.02.</p>
2J.03	NO	YES	NO	We support paragraph 1 of NPA Item #286 and the resulting changes in the marked-up version of the MUTCD to promote

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				<p>consistency between the logo sign panel and the on-premise business identification signs.</p> <p>We would also encourage consideration of further editing Section 2J.03, as shown in our attached correspondence, to allow for additional flexibility for those participants with a word message business identification sign panel to use a color scheme that more closely matches or aligns with their on-premise signing and/or provides contrast with the blue background panel.</p> <p>We support paragraphs 3 and 4 of NPA Item #286 and the resulting changes in the marked-up version of the MUTCD prohibiting certain supplemental messages on business identification sign panels and the display of messages related to the promotion or availability of logo space on Specific Service signs.</p> <p>In paragraph 6 of NPA Item #286, we support revising the Guidance provision regarding the legend and background color of supplemental messages to add consistency and improve motorists' ability to recognize supplemental information that is critical to their decision making; however, we have included an alternative to a single color combination for all types of supplemental messages in our attached correspondence.</p> <p>We support paragraph 8 of NPA Item #286 and the resulting changes in the marked-up version of the MUTCD that prohibit a business identification sign panel from displaying the identification logo/trademark or name of more than one business.</p> <p>We have included specific language in our attached correspondence we recommend revising and/or striking in 2J.03.</p>
2J.06	NO	NO	YES	<p>We oppose paragraph 2 of NPA Item #287 and the changes shown in the marked-up version of the MUTCD. The design and length of exit ramps varies greatly, and establishing an arbitrary longitudinal distance could significantly impact providing motorists with information designed to make travel safer and more efficient.</p> <p>We have included specific language in our attached correspondence we recommend revising and/or striking in 2J.06.</p>
2J.07	NO	NO	YES	<p>We support paragraphs 1 and 2 of NPA Item #288 and the resulting changes in the marked-up version of the MUTCD to provide greater flexibility regarding ramp signs and the display of distances on ramp signs.</p> <p>We oppose paragraph 4 of NPA Item #288 and the changes shown in the marked-up version of the MUTCD eliminating the option to use an exit number plaque on Specific Service signs. The use of exit number plaques provides greater flexibility, as well as, when used, reduces the overall square footage of the Specific Service sign, thus creating potential savings for the transportation agencies in the cost of the actual background panel and, in many cases, the support systems as well.</p> <p>We have included specific language in our attached correspondence we recommend revising and/or striking in 2J.07.</p>
2J.09	NO	NO	YES	<p>We oppose NPA Item #289 and the changes shown in the marked-up version of the MUTCD, and we believe the entire new Section 2J.09 should be stricken. This language also appears in NPA</p>

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				<p>Item #211 and in new Section 2E.36 Collector-Distributor Roadways for Successive Interchanges. The language should be stricken in 2E.36 as well.</p> <p>Should the decision be made to retain this new Section, we recommend changes shown in our attached correspondence replacing the General Service signs on the mainline with Specific Service signs, as well as changing the proposed Standard to Guidance to provide additional flexibility for the transportation agencies. These changes should also be reflected in new Figure 2J-4 and Figure 2E-32.</p> <p>Should this new Section be retained, we have included specific language in our attached correspondence we recommend revising and/or striking in 2J.09.</p>
2K.01	NO	NO	YES	<p>First, we encourage consideration of changing the Standard in Section 2K.01 that, “A facility shall be eligible for tourist-oriented directional signs only if it derives a major portion of income or visitors during the normal business season from road users not residing in the area of the facility,” to Guidance. As a practitioner, verifying this requirement has proven difficult and subjective.</p> <p>We oppose adding the words “or urbanized,” as this term is undefined and subjective. Additionally, several of the statewide TODS programs for which we are responsible currently allow signing in what could be considered “urbanized” areas without problems or issues.</p> <p>We have included specific language in our attached correspondence we recommend revising and/or striking in 2K.01.</p>
2K.02	NO	YES	NO	<p>We support the option to use recreational and cultural interest area symbols on tourist-oriented directional signs; however, we encourage consideration to making these symbols white on a blue background rather than white on a brown background in Section 2K.02.</p> <p>We also encourage consideration to increasing the allowable symbol height from 15 to 18 inches to match typical 4:3 sign dimension ratio in Section 2K.02. Alternatively, this new language could be changed from Standard to Guidance.</p> <p>We have included specific language in our attached correspondence we recommend revising and/or striking in 2K.02.</p>
2K.04	NO	NO	YES	<p>We oppose NPA Item #294 and the changes shown in the marked-up version of the MUTCD. The research completed by the Quebec Ministry of Transport and cited as support for reducing the number of signs per assembly from four (4) to three (3) used laboratory driving simulations with sign designs that have significant differences to the design, location, and application of tourist-oriented directional signs as outlined in the MUTCD. Additionally, several of the statewide TODS programs for which we are responsible currently allow sign assemblies with four (4) signs without problems or issues.</p> <p>We have included specific language in our attached correspondence we recommend revising and/or striking in 2K.04.</p>

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TABLE 2. AGREE WITH ANOTHER COMMENTER. If you agree with another commenter, please indicate the commenter with whom you agree with and note any additional information FHWA may find helpful or any exceptions.

Docket Comment Number and/or Commenter Name	Agree with commenter's comments as written	Agree with commenter; with exception(s)	Additional information helpful to FHWA, or exceptions to commenter's comments