



Florida Department of Transportation

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KEVIN J. THIBAUT, P.E.
SECRETARY

May 13, 2021

Mr. Mark Kehrli
Director, Office of Transportation Operations
Federal Highway Administration
1200 New Jersey Avenue, S.E., HOTO-1
Washington, DC 20590

Also by upload to: <https://www.regulations.gov/docket/FHWA-2020-0001>

RE: FHWA Docket No. FHWA-2020-0001
11th Edition of the Manual on Uniform Traffic Control Devices
Comments on Notice of Proposed Amendment

Dear Mr. Kehrli,

The Florida Department of Transportation (FDOT) strongly supports the December 14, 2020 Notice of Proposed Amendment (NPA) to update the 2009 Edition Manual on Uniform Traffic Control Devices (MUTCD). We recognize the extensive effort the FHWA has made toward issuing a new MUTCD, and we appreciate your leadership throughout this demanding process.

The proposed changes and additions to the MUTCD will help transportation practitioners better respond to traffic operations and safety needs on Florida's streets and highways. Since the last issue of the MUTCD in 2009, the transportation industry has experienced an exponential growth in several areas including technological advancements, behavioral research, and quantitative methods to evaluate traffic control devices for safety performance. FDOT's primary mission is to improve safety and mobility for all road users and an updated MUTCD that better reflects our current conditions and needs is key to achieving this mission.

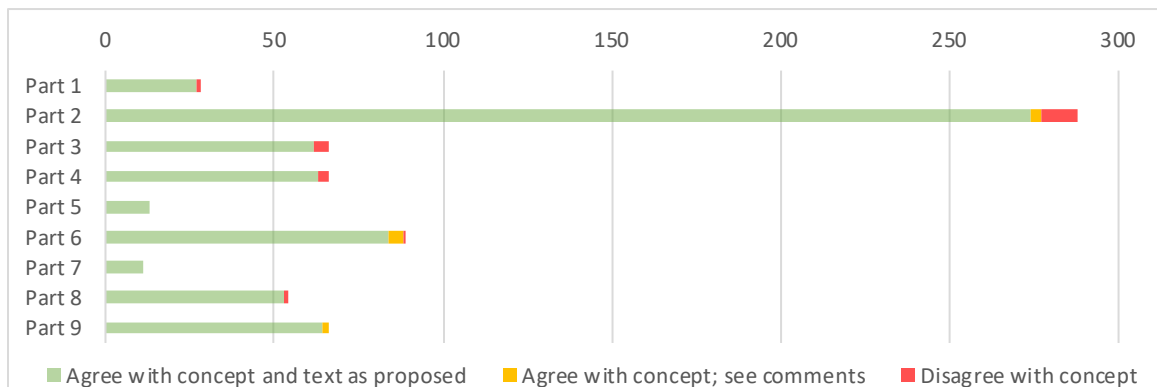
We understand the need for increased attention to non-motorists' safety and mobility as we experience a cultural shift to a context sensitive design approach. As our industry and processes transform, we look forward to supporting an in-depth review of the MUTCD structure and content. Nonetheless, this task should be further explored without negatively impacting the current NPA process and avoid delaying the new edition of the MUTCD. In addition, we suggest reducing the gaps in between MUTCD editions to better reflect new standards, technology, and best practices adopted with the progression of our industry.

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Attached is a spreadsheet with the FDOT comments on the changes proposed to be adopted in the MUTCD 11th Edition. FDOT's comments were developed through a thorough review of each NPA by a diverse group of technical experts. The comments represent the issues that we feel could have a negative impact to Florida and do not include editorial or "nice to have" comments.

While FDOT marked 651 NPAs as agree with concept and text as proposed, we recognize that many of our partner State DOTs may have concerns with some of these. We support the American Association of State Highway and Transportation Officials (AASHTO) comments on behalf of the State DOTs. Out of the provided 680 NPAs (647 NPAs with NPA 516 having 33 figures with alphanumerical NPAs), following is the breakdown of FDOT's comments by type and MUTCD Part number:

- FDOT **agrees with concept** (651 NPAs / 96%)
- FDOT **agrees with concept; but has edits on the proposed language** (9 NPAs / 1%)
- FDOT **disagrees with concept** (21 NPAs or 3%)*



* While Section 2G.18 has not been assigned a NPA, we recommend that NCUTCD 18A.GMI.02 be included in the new edition of the MUTCD.

Thank you for your consideration of these comments and please call me at (850) 410-5419 or Email me at trey.tillander@dot.state.fl.us if you have any questions or need further information.

Sincerely,

DocuSigned by:

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5/14/2021 | 10:35 AM EDT

V. Y. "Trey" Tillander III, P.E.
 State Traffic Operations Engineer
 Director, Traffic Engineering & Operations

cc: District Traffic Operations Engineers
 Khoa Nguyen, FHWA Florida Division Office
 Kevin Burgess, FHWA Florida Division Office