

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.
1B.01	NO	YES	N/A	NCUTCD generally agrees with 1B.01 as presented in the NPA, but recommends adding "or use a registered account" to the item on toll roads and adding "sidewalks or pathways" to the items on grade crossings to fully encompass the scope of the standard.
1B.02	NO	YES	N/A	NCUTCD generally agrees with 1B.02 as presented in the NPA, but recommends changing the 2nd paragraph of the NPA proposed Standard to Guidance. While it is clear that traffic control devices need to be in substantial conformance with the MUTCD, the Standard would imply that all documents related to the use and application of traffic control devices are considered agency Supplements to the MUTCD and therefore subject to FHWA approval. This would be overly burdensome if applied literally. NCUTCD also recommends deleting the NPA proposed Guidance as it contradicts the proposed Standard. Agencies would have to document guidelines for the implementation of Interim Approval items in some manner, and the previous proposed Standard would consider that documentation to be a Supplement to the MUTCD, while this Guidance says that Interim Approval items should not be in State MUTCDs or Supplements.
1B.03	YES	N/A	N/A	NCUTCD agrees with 1B.03 as presented in the NPA.
1B.04	NO	YES	N/A	NCUTCD agrees with 1B.04 as presented in the NPA.
Table 1B-1	YES	N/A	N/A	NCUTCD agrees with Table 1B-1 as presented in the NPA.
1B.05	YES	N/A	N/A	NCUTCD agrees with 1B.05 as presented in the NPA.

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1B.06	NO	YES	N/A	<p>NCUTCD supports the premise that no traffic control device should be placed on a public way or site open to public travel that would compromise the safety or mobility of road users; however, NCUTCD also notes that there are "provisions of this Manual" that are arguably not related to traffic control devices and others that have a wide variety of associated risk. NCUTCD recommends that this be considered when the Standards in this section are applied.</p> <p>NCUTCD recommends revising 1B.06 as follows:</p> <ul style="list-style-type: none"> • Add a Support paragraph at the beginning of the Section explaining the importance of experimentation • Add a Support paragraph after the first Standard statement to reinforce the value of experienced research professionals in the planning and implementation of effective experimentation plans and the subsequent value when the results are considered for inclusion in the MUTCD • Delete "authority" and restore the 2009 MUTCD term "operator" in Support, as the term "authority" is commonly used in the industry to represent public toll agencies and may imply that the condition would not apply to privately-owned and operated toll facilities - recommend this change in 6 other instances of "authority" in this context in the MUTCD • Change the second Standard statement to Guidance as it was in the 2009 MUTCD and in accordance with NCUTCD recommendation 17A-EC-01, because there should be flexibility to adjust the level of experimentation on a case-by-case basis • Add "if applicable" to control sites because not all experiments can/will have control sites available • Add "or as otherwise directed by FHWA" to Guidance to provide more flexibility for sites where the experimental device or application is unquestionably successful and may remain pending Interim Approval or inclusion in revisions to the MUTCD or subsequent editions • Add an Option statement that details the various means for jurisdictions to participate in, contribute to, or extend the scope of ongoing experimentation efforts to help simplify the process for subsequent jurisdictions • Clarify Support and Option language, simplify the reporting language, and delete added material that is considered unnecessary
Figure 1B-1	NO	YES	N/A	NCUTCD agrees with Figure 1B-1 as presented in the NPA, but recommends correcting the figure number as depicted from 1A-1 to 1B-1.
1B.07	NO	YES	N/A	NCUTCD agrees with 1B.07 as presented in the NPA, but with a minor editorial correction.
Figure 1B-2	NO	YES	N/A	NCUTCD agrees with Figure 1B-2 as presented in the NPA, but recommends correcting the figure number as depicted from 1A-2 to 1B-2.
1B.08	NO	YES	N/A	NCUTCD generally agrees with 1B.08 as presented in the NPA, but recommends corrections consistent with revisions to Sections 1B.06 and 1B.07.
1B.09	NO	YES	N/A	NCUTCD generally agrees with 1B.09 as presented in the NPA, but recommends corrections consistent with revisions to Sections 1B.06.