

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>
Table 1D-2	NO	YES	NO	Abbreviations for Eastbound, Westbound, Northbound, and Southbound should be shortened to EB, WB, NB, and SB. Using E-BND, W-BND, N-BND, and S-BND adds three additional characters and does not seem to provide clarity beyond the shorter abbreviations.
1B.01	NO	YES	NO	Letter B lists "airports" twice.
1C.02	NO	NO	YES	Definition of "Intersection" should include the junction of a side roadway with a public roadway. It is unclear why this no longer constitutes an intersection.
1C.02	NO	YES	N/A	Suggest clarifying definition of "Pedestrian." Are people on scooters (motorized or non-motorized) classified as pedestrians or a different type of road user?
2A.08	YES	N/A	NO	Agree with new Standard that "except as otherwise provided in this Manual, distances shall be displayed on signs using fractions of a mile rather than decimals." This standard seemed to be implied, but not clearly stated, in the previous version of the Manual.
2A.20	YES	N/A	NO	Agree with new Standard that "Where the color black is specified for the legend or background of a sign, an opaque or non-retroreflective material shall be used." The retroreflective requirements for black colors was unclear in the previous version of the Manual.
Figure 2A-1-E	NO	N/A	YES	Recommend showing the full-length of the vertical retroreflective strip on sign support so it is clear that the strip needs to extend to within 2-feet above the edge of the roadway.
2B.12	YES	N/A	NO	Agree with changing section name to "All-Way Stop Control" for consistency.
2B.20	NO	NO	YES	Disagree that In-Street or Overhead Pedestrian or Trail Crossing signs shall be used only as a supplement to a Pedestrian or Trail Crossing sign with a diagonal downward-pointing arrow. This requirement does not appear to be necessary and should remain as an Option statement. It appears that engineering judgement is

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				adequate to determine the appropriate level of signing at these locations and does not need to be prescribed by a shall statement. There may be crossings where the pedestrian or trail crossing can be adequately signed with In-Street or Overhead signs and the Pedestrian or Trail Crossing signs with diagonal downward-pointing arrows would be unnecessary.
Figure 2B-26	NO	NO	YES	Sign R10-25 in Figure 2B-26 was updated to indicate “Push Button For Warning Lights – Await Gap In Traffic” but text throughout the Manual still seems to reference the previous version of the sign “Push Button To Turn On Warning Lights.”
2B.50, 2B.52	NO	NO	YES	Section 2B.50 indicates that the R6-5P (roundabout circulation plaque) shall be mounted below the Yield sign when a One-Direction Large Arrow sign is used without a One Way sign. But Section 2B.52 appears to indicate that where One Way and/or One-Direction Large Arrow signs have been installed in the central island, the R6-5P may be placed below the Yield signs. These two sections appear to contradict each other. There also appears to be inconsistency since the R6-5P should be placed below the Yield sign where the central island does not provide a reasonable place to install a sign. Recommend that the use of the R6-5P (roundabout circulation plaque) is standardized, rather than variable between shall, should, and may conditions.
2B.60	NO	N/A	N/A	Provide versions of R10-15 and R10-15a that include both a Pedestrian and Bicycle symbol for use where turning vehicles must yield/stop for both pedestrians and bicycles.
2B.72	NO	NO	YES	Sign R16-3 legend seems to indicate that drivers must move over or reduce speed for any vehicle that is stopped on the shoulder. But many state laws only require this action for stopped emergency, maintenance, or service/repair trucks with flashing warning lights. Consider revising sign legend to provide more precise wording.
2C.06	NO	NO	YES	The relationship between Tables 2C-4a and 2C-4b is not immediately clear. Does the designer first go to table 2C-4a to determine the applicability of Table 2C-4b? A flow chart may be helpful to show the process of determining where and what horizontal alignment signs are optional, recommended, or required. The process for making this determination is currently unclear.
2C.07	YES	N/A	NO	Agree with change in guidance regarding use of the Turn sign instead of a Curve sign.
Figure 2C-7	NO	NO	YES	Orientation of Sign W12-1 (Double Arrow) should be flipped about the horizontal so that the arrows point in the directions of travel.
2C.08	NO	NO	YES	Do not agree with the prohibition of LEDs flashing from one chevron sign to the next along the curve or turn. This should be up to engineering judgement of each particular curve to determine if the LEDs should be flashed at the same time or sequentially. It is also unclear why the section states that LEDs “may” be flashed on all signs concurrently, but “shall not be flashed from one sign to the next.” Why is one statement “may” and the next “shall not”? It is not clear what other options would be available for flashing the LEDs.
2C.13	YES	N/A	NO	Agree with standard requiring speed feedback plaque to be mounted below a speed limit sign when used as a warning to motorist of their speed in relation to the posted speed limit. This places the feedback sign in the proper location for the motorist to take appropriate action if over the speed limit. Agree with standard to not flash, change color, strobe, or use other dynamic elements on the speed feedback sign.
Figure 2C.13	NO	NO	YES	Notes on Sheet 3 of 5 is unclear where signs would be located for a left-lane termination. Would signs be located across the roadway where visibility could be limited by oncoming traffic? Recommend

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				showing a figure with this condition, rather than just using notes on the right-lane termination figure. Based on the text of Section 2C.47, it appears that signs are only located on the left side of the roadway on one-way streets or divided highways, not on two-way roadways; this appears to conflict with Figure 2C.13. Please clarify.
Figure 2C.14	NO	NO	YES	Do not agree with the proposed signs shown on top figure of Figure 2C-14. The signs on the left portion of the figure seem to contradict each other. Why does the sign on each ramp appear to show that it is the “major” roadway and the other ramp is the “minor” roadway? Road users on each merging ramp may assume that they are on the major roadway and the other traffic stream will Yield to them. In addition, do not agree with the signs shown for the merge of the ramp and the major freeway. Why does the W4-1L sign on the ramp show the ramp as the major roadway and the freeway as smaller width line merging with it. This seems to violate driver expectancy and may be incorrectly interpreted that the roadway with the larger width on the sign is the major roadway. In general, recommend that the portion of the arrow that is wider always be used to represent the major roadway and the smaller width line always be used to represent the minor roadway.
2E.41	YES	N/A	N/A	Agree with alternate proposal that freeway and expressway diagrammatic signs should be discontinued.
2E.42	NO	NO	YES	Although it is understood why the through route destination would not be displayed on a modified Overhead Arrow-per-Lane guide sign, it is also unclear if this lack of positive guidance for the use of the option lane to continue through could also lead to confusion. It appears that the signing options in Figure 2E-48 and Figure 2E-49 would be more readily understood than the partial width Overhead Arrow-per-Lane guide sign.
Figure 2E-37	YES	YES	NO	Exit numbering (11 versus 13) is inconsistent on the signs.
2H.09	NO	NO	YES	The Project Information Sign in Figure 2H-3 appears to conflict with good signing practices established elsewhere in the MUTCD. The sign provides extraneous information (dollar value of project provided by various funding sources) that is of no value (and may serve only as a distraction) to the motoring public. This type of information is better conveyed to the public through other means (project website, etc.) rather than a roadside sign.
3A.04	NO	YES	NO	Agree with requiring 6 inch markings on freeways, expressways, and ramps. However, do not agree with requirement for 6 inch wide markings on roadways with speed limits over 40 mph (4 inch wide markings should be optional). Recommend that wide lines be defined simply as 8 inches wide. Ten inch wide longitudinal markings seems excessively wide.
3B.25, Figure 3B-8	YES	N/A	N/A	Agree with making chevron markings in the neutral area a recommended treatment.
3B.07	YES	N/A	N/A	Agree with changes from Option to Standard for uses of dotted white lines described in this section.
3B.11	NO	NO	YES	Reference to Definition 101 in Section 1C.02 points to definition of ILEV. Assume that the intention is to point to definition 106 “Intersection.” However, Section 3B.11 states that driveways can be considered intersections, which contradicts Section 1C.02 which states that driveways shall not constitute an intersection unless the public roadway or highway is controlled by a traffic control device.
Figure 3B.16	NO	YES	NO	Include a version of Figure 3B.16 (A) which shows the layout of signs and markings when the channelized right turn lane is a wider radius and there is sufficient room for vehicles to queue between the major roadway and the crosswalk.

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3B.25	NO	YES	NO	Page 364 of 781 in markup, line 12 lists “on paved shoulders” twice.
3B.24	NO	YES	NO	Please confirm 30 foot minimum distance from crosswalk to parking on approach to signal per UVC. Unclear where this is stated in the UVC.
Figures 3B-28, 29	N/A	N/A	N/A	Figures 3B-28 and 3B-29 were not included in the set of Figures downloaded from the Register and could not be reviewed.
3H.06	NO	NO	YES	A clarification may be appropriate in this section to reinforce that the MUTCD does not apply to parking areas that are either publicly or privately owned (following standard that green-colored pavement shall not be used for electric-vehicle parking).
3H.07	NO	NO	N/A	First option statement that “Red-colored pavement may be used where an engineering study determines that...” should be changed to “engineering judgment” rather than study. It appears that a reasonable assessment can be made through the application of engineering judgment rather than a formal study.
4C.02-10	NO	N/A	YES	Disagree with changing signal warrant criteria from Standard to Guidance. This could lead to signal installations at questionable locations and once those signals are installed, people may use those installations as justification to install additional signals at questionable locations (i.e., a signal that doesn’t meet warrants is installed at location “X”, and then is used to justify a signal at location “Y”).
4F.08	NO	N/A	YES	Disagree with optional use of three-section signal faces with a combined Flashing Yellow Arrow and steady yellow arrow indication. The flashing yellow arrow is still too new and not universally understood to begin using standard three section head. Using the four-section head helped alert motorists to a new type of traffic control. At least in locations where most motorists are not yet familiar with FYA operations, recommend only using the four-section signal layout.
4K.04	NO	N/A	YES	Disagree with change from Standard to Guidance regarding pushbutton locator tones to be audible from 6 to 12 feet from the pushbutton or building line. It would seem to eliminate the purpose of the locator tone if you can’t hear it 6-12’ from the button. It is unclear what in situations it would be useful or acceptable to have an indicator tone that cannot be heard 6’ from the push button.
4L.01	NO	NO	YES	Language stating that RRFB can be used at free-flow right turn lanes separated by a channelizing island should not be limited to right-turns only. RRFB should also be allowed for free-flow LEFT-turn lanes separated by a channelizing island.
7B.03	NO	YES	N/A	Clarify if the School Crossing assembly may be installed on a signalized approach.
7D.02	NO	NO	YES	This section appears to be written for crossing guards at uncontrolled crossings. Please consider how this language would apply to crossing guards at signalized locations. It appears that revisions or a separate section is needed to clarify operating procedures for crossing guards at signalized locations.
9E.08	YES	N/A	N/A	Agree with requirement that counter-flow bike lanes shall not be used between a general-purpose lane and an on-street parallel parking lane for motor vehicles. There are significant safety concerns regarding conflicts between bikes and vehicles pulling out of parking spaces, “door zone” conflicts, and conflicts with vehicles illegally stopped in the bike lane. The Bicycle Coalition of Greater Philadelphia has analyzed a design such as this and expressed similar concerns (https://bicyclecoalition.org/statement-new-2-way-spring-garden-street-cycletrack/). This design should be prohibited for the safety of all road users.

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9E.08	NO	YES	NO	Although we agree with the prohibition of a counter-flow bike lane between a general-purpose lane and an on-street parking lane, the prohibition should not be limited to “parallel” parking lanes. This may create an undesirable “loophole” allowing other types of parking lanes (e.g. angle parking lanes). The prohibition should include all types of parking lanes.
9E.08	NO	YES	NO	It is unclear why one-way signs with an “Except Bicycles” plaque cannot be used to regulate turns onto the one-way roadway with a counter-flow bike lane. It seems that recognition would be similar for this condition as for movement prohibition signs.
Figure 9B-7	NO	NO	YES	Waterfront – KEEP RIGHT sign appears that it should be labeled as sign “C”, but label is missing. Also, rather than KEEP RIGHT, suggest that this guide sign should indicate “NEXT EXIT” or “NEXT RIGHT.” It is unclear what bicycle traffic would be “keeping right” of since all bike traffic is in the single bike lane.
Figure 9B-7-2	NO	NO	YES	On the bottom left quadrant of the intersection, why is there a detectable warning surface shown where the trail connects to the sidewalk?
Figure 9D-1	NO	NO	YES	Multiple line bicycle guide signs (D1-2b, D1-2c, D1-3b, D1-3c) can be simplified by placing a single bicycle symbol in a top “header” rather than placing a bicycle symbol on each individual line.
Figure 9E-3	NO	NO	YES	Why are there no arrow legends shown in the right-hand bike lane (only the words BIKE LANE)?
Figure 9E-3	NO	NO	YES	In the left-hand bike lane, why is the upstream arrow a straight-ahead arrow and only the downstream arrow is a left-turn arrow? For consistency along the bike lane (and consistency with the vehicular lane), it appears that both arrows in the bike lane should be left-turn arrows.
Figure 9E-6-A	NO	NO	YES	It appears that portions of solid white line are missing from the “top” edge of the buffer space between the travel lane and the bike lane.
Figure 9E-10	NO	NO	YES	There appears to be extraneous arrow markings in the middle of the intersection.
9E.12	NO	NO	YES	Countdown pedestrian signal heads are required for certain bike box installations. However, in locations where the walk & flashing hand with countdown is provided upon pedestrian actuation only, the countdown may not be displayed when it is needed for the safe use of the bike box. If it is determined that the countdown information is absolutely needed for safe operation of the bike box, the MUTCD should require that the walk & flashing hand with countdown display be provided in every cycle.

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