

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>
A1	NO	N/A	YES	<p>Disagree with the proposal to add Clearview 5-W as an alternative letter style for sign destination legends. Research has shown no improvement in legibility when using Clearview, with any actual improvement coming from a larger text size (which obviously provides improved legibility in any font). Additionally, having multiple fonts in use at a time on signage—especially with different rules regarding their appropriate usage—causes confusion among agencies designing signs. This is apparent in the large number of signs old and new which use the Clearview font inappropriately (e.g., all-caps, negative contrast, numerals, etc.). Lastly, having a single font on all roadway signage across the United States makes it clear to the general public what a proper road sign is. This subtle messaging is confused when some regions use a different font than others.</p> <p>The <i>Report on Highway Guide Sign Fonts</i> has subsequently shown no new information that contradicts any of the above. I agreed with the 2016 rescindment of Clearview's Interim Approval and now disagree with the proposal to introduce Clearview to the MUTCD. I also believe that Interim Approval IA-5 should once again be rescinded as it was in 2016, though this is likely outside of the scope of the MUTCD public comments.</p>
2A.08	NO	YES	N/A	<p>The text "...when a mixed-case legend is used, the nominal loop height of the lower-case letters shall be 3/4 of the height of the initial upper-case letter" in Section 2A.08 should be clarified. It is already an improvement from the text of the 2009 MUTCD, which did not specify "nominal loop height," but still has potential for confusion. Because of the widespread misinterpretation of the previous text of this clause resulting in incorrectly proportioned lettering on signs</p>

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				(examples here , here , and here), it should be further clarified by the use of an extra sentence at the end. For example, "...the nominal loop height of the lower-case letters shall be $\frac{3}{4}$ of the height of the initial upper-case letter, sized proportionally according to the Standard Alphabet letter forms.
2E.18	NO	N/A	YES	I disagree that directional arrows on post-mounted Exit Direction signs should be located at the bottom. The arrows should be able to be placed at the left or the right side of the sign if appropriate, resulting in less materials cost and greater flexibility of design with post-mounted Exit Direction signs.
2D.11	NO	YES	N/A	<p>I agree with or have no opinion on the proposed changes to this section, but I would like to suggest an addition: where the text specifies "...the word INTERSTATE in white upper-case letters on a red background...", an additional specification requiring the word INTERSTATE to use Series C lettering should be added. (Alternatively, specify a proposed consistent width for the word on both 1- and 2-digit Interstate shields and 3-digit Interstate shields.)</p> <p>The purpose of this suggestion is to avoid agencies rendering the word INTERSTATE using a wider series such as Series E or F on 3-digit shields to fill the red space (examples here and here, compared to the word using the same width as on a 2-digit shield as seen here and here). I've noticed this much wider word INTERSTATE more often on recent signs and would like a clarification. If this is the intended style, then the text of this section of the MUTCD should be altered to reflect this so that all 3-digit Interstate shields have a consistent appearance.</p>
2D.16	NO	YES	N/A	I agree with the proposed changes to this section, but I also propose modifying the standard for the BY-PASS plaque to read BYPASS (unhyphenated) instead of BY-PASS. The word "bypass" has not been hyphenated in common usage for decades, with the BY-PASS plaques on alternate routes being one of the last places the hyphenated word is regularly used. This change would bring bypass route signage in agreement with modern language.

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