



**Moeurengineering, PLLC**  
[www.moeurengineering.com](http://www.moeurengineering.com)

May 14, 2021

United States Department of Transportation  
Docket Management Facility  
1200 New Jersey Ave. SE, Room W12-140  
Washington, DC 20590-0001

**Re: FHWA Docket FHWA-2020-0001, RIN 2125-AF85, National Standards for Traffic Control Devices; the Manual on Uniform Traffic Control Devices for Streets and Highways; Revision**

The following are comments submitted on the draft of the 11th Edition of the Manual on Uniform Traffic Control Devices published by the Federal Highway Administration (FHWA) for review and comment on December 14, 2020 with comments due by May 14, 2021.

These comments are submitted by Moeurengineering, PLLC, an Arizona corporation, and represent the positions, viewpoints, and professional opinions of Moeurengineering PLLC and its chief engineer, Richard C. Moeur, PE.

**These comments do not represent the position or opinions of any group, organization, corporation, or agency with which Mr. Moeur or Moeurengineering has or has had a personal, professional, employment, contractual, or business relationship. To be specific, these comments do not represent the position or opinions of NCUTCD, Bentley Systems, ADOT, AASHTO, LAB, ACA, ATSSA, TRB, ITE, PMBC, or other organizations, agencies, or groups.**

Moeurengineering PLLC is pleased to submit the following comments on the draft of the long-awaited 11th Edition of the MUTCD. Although Moeurengineering staff have probably read every word, table, and figure of the draft, and Mr. Moeur has a history of submitting a copious number of comments on past proposed amendments, an extraordinarily busy winter and spring has resulted in very little time for a deep review and analysis, and therefore the contributions for this draft will be modest.

Moeurengineering expresses the strongest support for completing the current rulemaking process and publishing the 11th Edition as soon as reasonably practicable. This nation has been waiting over 11 years for a new edition of the MUTCD, and we hope FHWA will move with all deliberate speed to publish this new edition.

The comments follow, presented on the Word table form as requested by FHWA.

I thank you for your time and interest.

Richard C. Moeur, PE  
Chief Engineer

# 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>
General				These comments are submitted by Moeurengineering, PLLC, an Arizona corporation, and represent the positions, viewpoints, and professional opinions of Moeurengineering PLLC and its chief engineer, Richard C. Moeur, PE.
General				<b>These comments do not represent the position or opinions of any group, organization, corporation, or agency with which Mr. Moeur or Moeurengineering has or has had a personal, professional, employment, contractual, or business relationship. To be specific, these comments do not represent the position or opinions of NCUTCD, Bentley Systems, ADOT, AASHTO, LAB, ACA, ATSSA, TRB, ITE, PMBC, or other organizations, agencies, or groups.</b>
General				Moeurengineering expresses the strongest support for completing the current rulemaking process and publishing the 11th Edition as soon as reasonably practicable. This nation has been waiting over 11 years for a new edition of the MUTCD, and we hope FHWA will move with all deliberate speed to publish this new edition.
General				Some of these comments differ from and in some cases disagree with or contradict comments submitted by other persons, agencies, or organizations. In those cases, Moeurengineering is clear that although there is a difference in professional opinion on that particular item, this does not reflect on other contributions by any other party or imply a lack of respect for the effort and deliberation behind their comments.


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1B.02	NO	NO	YES	Moeurengineering notes a new Standard statement added to Section 1B.02 defining all policies, directives, specifications, standard drawings, or similar documents relating to traffic control devices as being considered "MUTCD supplements" requiring FHWA approval per 23 CFR 655.603. While rewriting these documents to meet FHWA expectations could be a lucrative source of income for a consulting firm such as Moeurengineering, a better approach would be to delete this Standard paragraph, reduce the workload on agencies and FHWA, and trust agencies and practitioners to do the best job in developing these references to serve practitioners and the public without onerous oversight, similar to how other functions have been devolved to local and state agencies.
2C.40	NO	YES	N/A	<p>Moeurengineering recommends adding a SPEED REDUCED AHEAD sign to the W3-5 series. This sign has a clear, simple message similar to the old R2-5a, and can be used for a wide variety of speed transitions, which could greatly reduce the need for agencies to fabricate and stock W3-5 signs for different speeds, especially for temporary traffic control. This sign has been successfully used in Arizona for nearly 20 years.</p> 
2C.44	NO	NO	YES	The traffic signal practice commonly known as "yellow trap" is a very serious safety concern, and can result in severe or fatal crashes. The W25 series of signs were added to the MUTCD to attempt to address this issue. However, there seems to be little evidence these signs are effective in influencing driver left turn behavior. In recent years other engineering tools such as flashing yellow arrow and split phasing have been added to the MUTCD. Moeurengineering recommends that FHWA consider a plan to phase out "yellow trap" signal conditions and W25 signs, possibly with a 10-15 year compliance date in order to reduce the burden on affected agencies.
Table 2D-1	NO	YES	N/A	Moeurengineering recommends reassigning Table 2D-1 from Standard to Guidance, in much the same way that other authoritative tables in Part 2 are at Guidance level. This will establish uniform recommended minimum sizes for these signs, but allow variances where physical and other constraints do not practically accommodate the use of recommended sizes.

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2D.05	NO	NO	YES	<p>Current electronic sign design practice uses only the upper case letter height to correctly select the letter size for all text, similar to nearly all other software. Some sign designers seem to think that upper &amp; lower case letter heights are handled identically to the practice for cardinal directions of specifying shorter upper case letter heights for letters following the initial letter. This then creates a sign with lower case legend that is too small, which greatly reduces legibility and no longer meets MUTCD Standards.</p> <p>Examples from across the US of misformatted signs due to confusion on lower case letter height:</p>  <p>Moeurengineering strongly recommends revising Section 2D.05 by removing any and all references to the obsolete practice of referring to lower-case letter loop height and instead refer solely to upper case or mixed case letter height.</p>
Table 2D-2	NO	NO	YES	<p>See comments on Section 2D.05 regarding lower case text.</p>

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Table 2D-5	NO	NO	YES	See comments on Section 2D.05 regarding lower case text.
2D.58	NO	NO	YES	<p>Moeurgineering does not agree with the Standard statement in 2D.58 that reads “Scenic byway, historic trail and auto tours route signs shall not incorporate standard highway sign legend elements into their design.” This would result in the prohibition and elimination of nearly all historic US or state highway route markers used in many states, even though these markers have been used successfully for decades to provide guidance to travelers and have arguably resulted in many millions of dollars of tourist revenue along these signed corridors. These function identically to standard route markers, and should not be arbitrarily prohibited.</p> <p>An example:</p>  <p>Moeurgineering strongly recommends deleting this Standard paragraph and allowing the continued use of these signs.</p>
2E.12	NO	NO	YES	Moeurgineering recommends modifying Section 2E.12 to allow the use of appropriate alphabets other than Series E Modified on freeway and expressway guide signs. For example, Series E offers excellent legibility and avoids halation issues at night, and is arguably superior to Series E Modified when used on modern high-performance sign sheetings. Series D can be very useful where lateral space is constrained, such as for a longer destination message on an overhead sign over a single lane.
2E.12	NO	NO	YES	See comments on Section 2D.05 regarding lower case text.
Table 2E-1 to 2E-5	NO	YES	N/A	Moeurgineering recommends reassigning Table 2E-1 through 2E-5 from Standard to Guidance, in much the same way that other authoritative tables in Part 2 are at Guidance level. This will establish uniform recommended minimum sizes for these signs and related legend elements, but allow variances where physical and other constraints do not practically accommodate the use of recommended sizes.
Tables 2E-2 to 2E-5	NO	NO	YES	See comments on Section 2D.05 regarding lower case text.
Table 2E-5	NO	NO	YES	Moeurgineering recommends either reducing the minimum heights of arrows used on arrow-per-lane signs, or deleting these heights entirely until current ongoing pooled fund research on the topic is complete and reviewed. Arrow-per-lane signs are already very large, and require special sign support structures. Signs that are unnecessarily large can impose severe impacts on agencies for what could be only marginal effects on legibility.



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2E.18	NO	NO	YES	Moeurengineering strongly disagrees with the Standard paragraph requiring directional arrows on post-mounted exit direction signs to be located at the bottom portion of the sign and centered under the legend. This is not consistent with decades of sign design practice and many examples depicted in Chapter 2E itself. As seen on arrows on direction signs on conventional roads, placing the arrow on the side where the arrow points is simply good human factors practice. This will also result in unnecessarily taller panels, which will require larger, more expensive, and possibly less crashworthy posts or supports. Deleting this paragraph and continuing the accepted practice of arrows either at the side or bottom based on engineering judgment is best.
9D.04	NO	NO	YES	Moeurengineering staff have decades of experience with numbered bicycle route systems, including chairing a national-level task force on numbered routes for over a decade and a key role in the redesign of the M1-9 marker. We recognize the value of route signing in providing traveler guidance, but also recognize the limitations of agencies and organizations in their ability to provide guide signing for numbered routes. Moeurengineering <u>does not agree</u> with the Standard statement requiring all numbered routes to be signed, as even if well-intentioned it seems to be a case of “perfect as the enemy of good”. If implemented, this will likely have a net negative effect, where some agencies will cease development on numbered route systems or even abandon existing designated routes since they don’t have the resources to provide and maintain a full set of signs. This would stymie efforts to create connected route networks at the local, regional, and national level. Delete this Standard.
9E.14	NO	NO	YES	Moeurengineering agrees with adding bicycle route pavement markings to the MUTCD, recognizing their value (see 9D.04 above). However, Moeurengineering does not agree with the Standard statements limiting these markings to shared-use paths or separated bicycle lanes, and prohibiting them on standard bicycle lanes, buffer-separated bicycle lanes, or in shared lanes. We understand there may be concerns regarding other road users reacting inappropriately to these markings, but a body of experience indicates that drivers ignore markings they perceive as being irrelevant to their task. Restricting these markings in this manner prevents their use in creating a consistent network of bicyclist guidance on a full range of facilities. Delete this Standard.  Moeurengineering also does not agree with prohibiting elongation of bicycle route markings, as bicyclists also scan down the road or other facility at a shallow angle similar to motorists, and elongated markings can assist in correcting for legibility. A review of the 2004 Standard Highway Signs and Markings document reveals that nearly all bicyclist markings are indeed elongate, and several figures in Part 9 in the NPA display elongated markings. Delete this Standard.

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Appendix A1	NO	NO	YES	<p>Moeurengineering staff have extensive experience (both good and not-as-good) in using Clearview in accordance with Interim Approval IA-5. Moeurengineering does not endorse the use of Clearview, but does not object to its use by agencies to see value in it.</p> <p>Moeurengineering strongly disagrees with renaming Clearview as “Series E(modified)-Alternate”, as this term will very likely result in confusion by practitioners, decisionmakers, and others as to what is meant by that term. First, this term would seem only to encompass the 5-W character set and 5-W or 5-W-R spacing tables, and leaves out the full range of 1W-6W alphabets useful for a variety of conditions. Also, E(M) and 5-W are notably different typefaces and have notably different characteristics in practical use. Although FHWA should be commended for trying to move this issue forward, Moeurengineering recommends any action to incorporate Clearview should be consistent with the following guidelines:</p> <ul style="list-style-type: none"> <li>• Use the common term “Clearview”, as it is best understood by practitioners and the public</li> <li>• Incorporate the full range of 1W-6W positive contrast alphabets</li> <li>• Allow its use for all positive-contrast messages on guide signs</li> </ul>
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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
General Note			Agreement with other organizations does not constitute representation of those organizations.
FHWA-2020-0001-0275	YES	N/A	Moeurengineering agrees with the content and intent of the joint NCUTCD / AASHTO / ITE letter calling for FHWA to proceed to a Final Rule and 11th Edition as fast as practicable.
FHWA-2020-0001-2638	YES	N/A	Moeurengineering agrees with NCUTCD's comments on Chapter 1A.
(tracking number ko1-mft3-rseb)	YES	N/A	Moeurengineering agrees with NCUTCD's comments on Chapter 1B.
(tracking number koi-mk63-rt8k)	YES	N/A	Moeurengineering agrees with NCUTCD's comments on Chapter 1C.
FHWA-2020-0001-2639	YES	N/A	Moeurengineering agrees with NCUTCD's comments on Chapter 1D.
FHWA-2020-0001-1701	YES	N/A	Moeurengineering agrees with NCUTCD's comments on Chapter 2A.
FHWA-2020-0001-1558	YES	N/A	Moeurengineering agrees with NCUTCD's comments on Chapter 2B, and endorses NCUTCD's position on speed zoning in Section 2B.21. Mr. Moeur was in the past professionally responsible for statewide speed zoning for a large western US state, and has considerable experience in the topic. Focusing the MUTCD on defining the use of the device and giving agencies and practitioners the latitude to use credible traffic engineering references for setting speed zones seems to be the best balance on this important and politically-charged topic.
(tracking number koi-qlon-k3n9)	NO	YES	Moeurengineering generally agrees with NCUTCD's comments on Chapter 2C, with exceptions noted in Table 1.

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(tracking number kol-lft2-goux)	NO	YES	Moeurengineering generally agrees with NCUTCD's comments on Chapter 2D, with exceptions noted in Table 1. Moeurengineering especially endorses NCUTCD's position on deleting lower case letter height references in 2D.05 and Table 2D-2.
(tracking number koo-cfof-n8s1)	NO	YES	Moeurengineering generally agrees with NCUTCD's comments on Chapter 2E, with exceptions noted in Table 1.
(tracking number koo-cktc-z64p)	YES	N/A	Moeurengineering agrees with NCUTCD's comments on Chapter 2F.
(tracking number koo-cr37-o2bk)	YES	N/A	Moeurengineering agrees with NCUTCD's comments on Chapter 2G.
FHWA-2020-0001-1744	YES	N/A	Moeurengineering agrees with NCUTCD's comments on Chapter 2H.
FHWA-2020-0001-2458	YES	N/A	Moeurengineering agrees with NCUTCD's comments on Chapter 2I.
FHWA-2020-0001-1745	YES	N/A	Moeurengineering agrees with NCUTCD's comments on Chapter 2J.
FHWA-2020-0001-1746	YES	N/A	Moeurengineering agrees with NCUTCD's comments on Chapter 2K.
FHWA-2020-0001-2492	YES	N/A	Moeurengineering agrees with NCUTCD's comments on Chapter 2L.
(tracking number kol-vd1i-1bea)	YES	N/A	Moeurengineering agrees with NCUTCD's comments on Chapter 2M.
(tracking number kol-k823-uaek)	YES	N/A	Moeurengineering agrees with NCUTCD's comments on Chapter 2N.
(tracking number koi-mwjq-vg6i)	YES	N/A	Moeurengineering agrees with NCUTCD's comments on Chapter 3A.
(tracking number kok-2swm-8rku)	YES	N/A	Moeurengineering agrees with NCUTCD's comments on Chapter 3B.
(tracking number koi-mznt-bjc1)	YES	N/A	Moeurengineering agrees with NCUTCD's comments on Chapter 3C.
(tracking number koi-n6dv-im0v)	YES	N/A	Moeurengineering agrees with NCUTCD's comments on Chapter 3D.
(tracking number koi-r7bn-hycf)	YES	N/A	Moeurengineering agrees with NCUTCD's comments on Chapter 3E.
(tracking number koi-rlzb-rzjq)	YES	N/A	Moeurengineering agrees with NCUTCD's comments on Chapter 3F.
(tracking number koi-t0cu-0q7h)	YES	N/A	Moeurengineering agrees with NCUTCD's comments on Chapter 3G.
(tracking number koi-xkmr-s5bj)	YES	N/A	Moeurengineering agrees with NCUTCD's comments on Chapter 3H.
(tracking number koi-vdxi-klp2)	YES	N/A	Moeurengineering agrees with NCUTCD's comments on Chapter 3I.
(tracking number koi-vptt-vvno)	YES	N/A	Moeurengineering agrees with NCUTCD's comments on Chapter 3J.
(tracking number koi-vw67-4186)	YES	N/A	Moeurengineering agrees with NCUTCD's comments on Chapter 3K.
FHWA-2020-0001-2493	YES	N/A	Moeurengineering agrees with NCUTCD's comments on Chapter 4A.
FHWA-2020-0001-2412	YES	N/A	Moeurengineering agrees with NCUTCD's comments on Chapter 4B.
FHWA-2020-0001-2413	YES	N/A	Moeurengineering agrees with NCUTCD's comments on Chapter 4C.



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FHWA-2020-0001-2414	YES	N/A	Moeurengineering agrees with NCUTCD's comments on Chapter 4D.
FHWA-2020-0001-2586	YES	N/A	Moeurengineering agrees with NCUTCD's comments on Chapter 4E.
(tracking number koi-nepj-rdbj)	YES	N/A	Moeurengineering agrees with NCUTCD's comments on Chapter 4F.
FHWA-2020-0001-2415	YES	N/A	Moeurengineering agrees with NCUTCD's comments on Chapter 4G.
FHWA-2020-0001-2571	YES	N/A	Moeurengineering agrees with NCUTCD's comments on Chapter 4H.
FHWA-2020-0001-2416	YES	N/A	Moeurengineering agrees with NCUTCD's comments on Chapter 4I.
FHWA-2020-0001-2417	YES	N/A	Moeurengineering agrees with NCUTCD's comments on Chapter 4J.
FHWA-2020-0001-2418	YES	N/A	Moeurengineering agrees with NCUTCD's comments on Chapter 4K.
FHWA-2020-0001-2419	YES	N/A	Moeurengineering agrees with NCUTCD's comments on Chapter 4L.
FHWA-2020-0001-2420	YES	N/A	Moeurengineering agrees with NCUTCD's comments on Chapter 4M.
FHWA-2020-0001-2421	YES	N/A	Moeurengineering agrees with NCUTCD's comments on Chapter 4N.
FHWA-2020-0001-2422	YES	N/A	Moeurengineering agrees with NCUTCD's comments on Chapter 4O.
FHWA-2020-0001-2423	YES	N/A	Moeurengineering agrees with NCUTCD's comments on Chapter 4P.
FHWA-2020-0001-2424	YES	N/A	Moeurengineering agrees with NCUTCD's comments on Chapter 4Q.
FHWA-2020-0001-2425	YES	N/A	Moeurengineering agrees with NCUTCD's comments on Chapter 4R.
FHWA-2020-0001-2426	YES	N/A	Moeurengineering agrees with NCUTCD's comments on Chapter 4S.
FHWA-2020-0001-2427	YES	N/A	Moeurengineering agrees with NCUTCD's comments on Chapter 4T.
FHWA-2020-0001-2428	YES	N/A	Moeurengineering agrees with NCUTCD's comments on Chapter 4U.
(tracking number kol-ne3x-bair)	YES	N/A	Moeurengineering agrees with NCUTCD's comments on Chapter 5A, especially the recommendation that all Part 5 material be at the Support level.
(tracking number kol-np ef-0juk)	YES	N/A	Moeurengineering agrees with NCUTCD's comments on Chapter 5B, especially the recommendation that all Part 5 material be at the Support level.
(tracking number kol-k2mc-ztli)	YES	N/A	Moeurengineering agrees with NCUTCD's comments on Chapter 6A.
FHWA-2020-0001-2508	YES	N/A	Moeurengineering agrees with NCUTCD's comments on Chapter 6B.
FHWA-2020-0001-2509	YES	N/A	Moeurengineering agrees with NCUTCD's comments on Chapter 6C.
FHWA-2020-0001-2495	YES	N/A	Moeurengineering agrees with NCUTCD's comments on Chapter 6D.
FHWA-2020-0001-2496	YES	N/A	Moeurengineering agrees with NCUTCD's comments on Chapter 6E.
(tracking number kol-vh xh-0ouv)	YES	N/A	Moeurengineering agrees with NCUTCD's comments on Chapter 6F.

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(tracking number kol-vmu9-lxxv)	YES	N/A	Moeurengineering agrees with NCUTCD's comments on Chapter 6G.
(tracking number kol-vpuv-w88h)	YES	N/A	Moeurengineering agrees with NCUTCD's comments on Chapter 6H.
FHWA-2020-0001-2499	YES	N/A	Moeurengineering agrees with NCUTCD's comments on Chapter 6I.
FHWA-2020-0001-2500	YES	N/A	Moeurengineering agrees with NCUTCD's comments on Chapter 6J.
(tracking number kol-vt9a-ancm)	YES	N/A	Moeurengineering agrees with NCUTCD's comments on Chapter 6K.
(tracking number kol-vx39-32m2)	YES	N/A	Moeurengineering agrees with NCUTCD's comments on Chapter 6L.
(tracking number kol-w0m7-f89o)	YES	N/A	Moeurengineering agrees with NCUTCD's comments on Chapter 6M.
(tracking number kol-wrcg-0sio)	YES	N/A	Moeurengineering agrees with NCUTCD's comments on Chapter 6N.
FHWA-2020-0001-2501	YES	N/A	Moeurengineering agrees with NCUTCD's comments on Chapter 6O.
(tracking number koi-xon9-27ts)	YES	N/A	Moeurengineering agrees with NCUTCD's comments on Chapter 6P.
FHWA-2020-0001-2459	YES	N/A	Moeurengineering agrees with NCUTCD's comments on Chapter 7A.
FHWA-2020-0001-1750	YES	N/A	Moeurengineering agrees with NCUTCD's comments on Chapter 7B.
FHWA-2020-0001-2461	YES	N/A	Moeurengineering agrees with NCUTCD's comments on Chapter 7C.
FHWA-2020-0001-1752	YES	N/A	Moeurengineering agrees with NCUTCD's comments on Chapter 7D.
FHWA-2020-0001-2572	YES	N/A	Moeurengineering agrees with NCUTCD's comments on Chapter 8A.
FHWA-2020-0001-2573	YES	N/A	Moeurengineering agrees with NCUTCD's comments on Chapter 8B.
FHWA-2020-0001-2575	YES	N/A	Moeurengineering agrees with NCUTCD's comments on Chapter 8C.
FHWA-2020-0001-2576	YES	N/A	Moeurengineering agrees with NCUTCD's comments on Chapter 8D.
FHWA-2020-0001-2577	YES	N/A	Moeurengineering agrees with NCUTCD's comments on Chapter 8E.
FHWA-2020-0001-2429	YES	N/A	Moeurengineering agrees with NCUTCD's comments on Chapter 9A.
FHWA-2020-0001-2538	YES	N/A	Moeurengineering agrees with NCUTCD's comments on Chapter 9B.
FHWA-2020-0001-2516	YES	N/A	Moeurengineering agrees with NCUTCD's comments on Chapter 9C.
FHWA-2020-0001-2536	NO	YES	Moeurengineering agrees with NCUTCD's comments on Chapter 9D, with exceptions noted in Table 1.
(tracking number koi-nqcb-9i5c)	NO	YES	Moeurengineering generally agrees with NCUTCD's comments on Chapter 9E, with exceptions noted in Table 1.
(tracking number koi-nt9q-0j8a)	YES	N/A	Moeurengineering agrees with NCUTCD's comments on Chapter 9F.
(tracking number koo-cwzf-097n)	NO	YES	Moeurengineering agrees with NCUTCD's comments on Appendix A1, with exceptions noted in Table 1.
FHWA-2020-0001-1719	YES	N/A	Moeurengineering agrees with NCUTCD's comments on Appendix A2.

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(seemingly-infinite)	NO	NO	<p>Moeurineering does not agree with the numerous comments calling for stopping work on the NPA or immediately “reframing and rewriting the MUTCD”. FHWA has performed a rather good job overall in issuing Interim Approvals to introduce new devices and treatments. Changes to the MUTCD, even ones that might on their face seem minor, can have very significant, operational, safety, and risk management impacts. The current frustration with the lack of progress on the MUTCD may be due to political considerations, as regulatory activities may be drawn into high-level policy decisions based more on partisan interests than the needs of the American traveling public. The Trump Administration should be commended for moving the 11th Edition forward (although at a pace that resulted in the rulemaking extending beyond his term), and hopefully the Biden/Harris Administration will complete this work. The current process may seem slow and antiquated to activists accustomed to seeing their will expressed quickly. But the current process of thorough and careful analysis, deliberation, consensus-building, and review by experienced subject matter experts from a very wide variety of backgrounds and professional practice results in the best practicable traffic control standards and guidance for all US road users that can be applied for decades to come across the entire nation. Any efforts to shortcut or bypass this process may likely have unforeseen safety and operational consequences that are greater than then well-documented concerns that have been raised, and could result in traffic ‘control’ that is ineffective or even ignored, resulting in an even-worse situation.</p>
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