



Department of Transportation

Margaret Forgione, Acting Commissioner

January 4th, 2021

Nicole R. Nason, Administrator
Federal Highway Administration
U.S. Department of Transportation
1200 New Jersey Avenue S.E.
Washington, DC 20590

Re: Extension of Commenting Period for Docket No. FHWA-2020-0001

Dear Administrator Nason:

The NYC Department of Transportation (NYCDOT) is hereby requesting an extension of the docket period from 90 days to 180 days for the Notice of Proposed Amendments (NPA) for the upcoming 11th Edition of the Manual on Uniform Traffic Control Devices (MUTCD).

NYCDOT provides safe, efficient, and environmentally responsible movement of people and goods in the City of New York maintaining and enhancing the transportation infrastructure crucial to the economic vitality and quality of life of the region. NYCDOT oversees one of the most complex urban transportation networks in the nation managing 6,000 miles of streets and highways, 12,000 miles of sidewalk and over 1,200 miles of bicycle routes. NYCDOT also installs and maintains over one million street signs, 12,700 signalized intersections, and over 200 million linear feet of markings.

NYCDOT develops recommendations for the docket through comprehensive input from seven diverse offices within NYCDOT's Divisions of Transportation Planning & Management and Traffic Operations. These offices each review all proposed changes to the MUTCD, develop lists of comments, and upon receiving input from all offices form a consolidated submission of recommendations to the docket.

As it is known the marked-up text of proposed changes to the MUTCD is 784 pages long and will be incorporating over 150 Official Experiments of novel traffic control devices and applications, Official Interpretations, Interim Approvals, and other research, many of which NYCDOT will need to review in relation to current standards incorporated by this agency.



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While it is of great interest for the new MUTCD to be published as soon as practicable, it should also be noted that the 2008 NPA had a docket period of 180 days meaning only one-half of the time is being afforded to the development of a response for this docket. The availability of a satisfactory time to review the docket is of utmost importance to develop the highest quality version of the Final Rule as possible. NYCDOT sees their contributions towards enhancing traffic safety for all road uses, particularly through the City of New York's Vision Zero initiative, to be especially integral to the review process of this docket. The addition of 90 days to the docket period is a small ask for this value-added process.

Furthermore, as the NPA was published in mid-December, the 90 day period includes a time when many of our staff have taken extended leaves to coincide with the holiday season. This further reduces the effective time that can be used to develop recommendations during this docket period.

For all the above reasons, NYCDOT respectfully requests that the docket period be extended from 90 days to 180 days for the subject NPA. Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Eric Beaton".

Eric Beaton
Deputy Commissioner
Division of Transportation Planning & Management
NYC Department of Transportation