



January 6, 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 International Bridge, Tunnel and Turnpike Association (IBTTA) endorses the request by the National Committee on Uniform Traffic Control Devices (NCUTCD) and other organizations to extend the docket period from 90 days to 180 days for the Notice of Proposed Amendments (NPA) that will ultimately result in the 11th edition of the Manual on Uniform Traffic Control Devices (MUTCD).

IBTTA represents the 128 toll operators in 34 states that support more than 8.5 billion freight and passenger trips per year and generate more than \$20 billion in toll revenues annually to pay for maintenance and upgrades on 6,300 miles of highways, bridges, and tunnels. IBTTA's members not only operate some of the most critical highway infrastructure in the U.S., but also represent a fundamental element of the safety and efficiency in road operations that are core mission for toll facilities. The MUTCD is a foundational element to a record of operations performance and customer experience that motorists of toll facilities expect and deserve.

Considering the extent of the changes and additions that have been proposed in the December 2020 NPA and the fact that the last review in 2008 allowed for 180 days for comments, we believe the request for an extension of the review period is reasonable and justifiable. Given the role of IBTTA's representatives in providing comments on new aspects of the MUTCD addressing tolling and road pricing, the extension will support our ability to ensure a thorough review and subsequent communication of comments to the Association's membership. We pride ourselves on a collaborative and consensus-based review process that allows for input from a diverse array of stakeholders, which will benefit from allowing 180 days for review. Additionally, the NPA was published just prior to the December holiday period, which made many key people unavailable for any meaningful review until this week, further curtailing the effective review period.

As such, the IBTTA respectfully requests that the docket period be extended from 90 days to 180 days for the MUTCD Notice of Proposed Amendments. Thank you for your consideration of this request and best wishes for a happy, safe, and productive new year.

Sincerely,

A handwritten signature in black ink, appearing to read "P. Jones", with a stylized, cursive script.

Patrick D. Jones
Executive Director & CEO
IBTTA

Copy to:
Gene Hawkins, Chair, National Committee on Uniform Traffic Control Devices