

# 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>
All				See other file submitted to docket which shows detailed recommended changes to the draft MUTCD text, figures, and tables.
1D.01	NO	YES	N/A	NCUTCD generally agrees with 1D.01 as presented in the NPA, but recommends deletion of the text in the first paragraph cross-referencing to Section 1A.03, because NCUTCD has recommended deletion of all of Section 1A.03 (see docket comments on Chapter 1A.) In the Standard paragraph, NCUTCD notes that the reference to Section 1A.03 is apparently incorrect and we assume that the reference is to Section 1A.03 of the 2009 MUTCD, which does not have a Paragraph 5. Section 1A.03 of the 2009 MUTCD corresponds with Section 1D.06 Design of Traffic Control Devices, of the NPA, which does not appear to have language relevant to this Standard. NCUTCD believes the referenced material is included in proposed Section 2A.07, but FHWA should confirm this. The other recommended change shown below in this Standard paragraph is editorial.
1D.02	NO	YES	N/A	NCUTCD generally agrees with 1D.02 as presented in the NPA, but recommends editorial changes to separate the list of characteristics and activities into two separate lists, one for characteristics and one for activities for clarity.
1D.03	YES	N/A	N/A	NCUTCD agrees with 1D.03 as presented in the NPA.

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1D.04	NO	YES	N/A	NCUTCD generally agrees with 1D.04 as presented in the NPA, but recommends deleting the first Support paragraph, because the referenced 23 CFR 1.23(b) does not apply to all public right-of-way, especially within local jurisdictions. Also, there are some public highways that are located on easements (such as through National Forests) and not within a right-of-way. Further, the regulation is not related to traffic control devices and should not be included in the MUTCD.
1D.05	YES	N/A	N/A	NCUTCD agrees with the text of 1D.05 as presented in the NPA.
1D.06	NO	YES	N/A	NCUTCD generally agrees with 1D.06 as presented in the NPA. However, NCUTCD recommends that FHWA consider moving the second Standard paragraph regarding color gradients to Chapter 2A. The first Standard paragraph regarding shapes applies to at least two parts of the Manual and therefore is appropriate for Part 1 and should remain in Section 1D.06. However, in that second Standard paragraph, NCUTCD recommends adding “triangle for Yield” because it is a shape that is exclusive to a particular sign.
1D.07	YES	N/A	N/A	NCUTCD agrees with 1D.07 as presented in the NPA.
1D.08	YES	N/A	N/A	NCUTCD agrees with 1D.08 as presented in the NPA.
1D.09	YES	N/A	N/A	NCUTCD agrees with 1D.09 as presented in the NPA.
1D.10	NO	YES	N/A	NCUTCD agrees with 1D.10 as presented in the NPA.
Table 1D-1	NO	YES	N/A	NCUTCD generally agrees with Table 1D-1 as presented in the NPA, except that THURS should be removed from the General Abbreviations portion of the table, because it duplicates what is listed in the Days of the Week portion of the table.
Table 1D-2	YES	N/A	N/A	NCUTCD agrees with Table 1D-2 as presented in the NPA.
Table 1D-3	YES	N/A	N/A	NCUTCD agrees with Table 1D-3 as presented in the NPA.
1D.11	YES	N/A	N/A	NCUTCD agrees with 1D.11 as presented in the NPA.
1D.12	YES	N/A	N/A	NCUTCD agrees with 1D.12 as presented in the NPA.
1D.13 (proposed by NCUTCD)	N/A	N/A	N/A	NCUTCD recommends relocating text from Sections 6A.04 and 1C.02 to create a new Section 1D.13 incorporating all material related to crashworthiness into one section. As noted in the comments on Section 1C.02, the Section 1C.02 definition of “Crashworthy” extends beyond what would be considered a definition and includes material that warrants discussion in a separate Section. The recommended new 1D.13 includes language from 6A.04 that NCUTCD recommends changing from Support to Standard, and also includes a Support statement adapted from the proposed definition of “Crashworthy”. NCUTCD recommends that all cross-references regarding crashworthy and crashworthiness in other Parts of the MUTCD should refer to this new Section 1D.13.