

May 13, 2021

submitted via Portal

U.S. Department of Transportation
Federal Highway Administration
1200 New Jersey Avenue, SE
Washington, DC 20590

RE: Comments to the Docket FHWA -2020-001

Interstate Logos, L.L.C., through its' subsidiaries, Colorado Logos, Inc., Delaware Logos, L.L.C., Florida Logos, L.L.C., Georgia Logos L.L.C., Kansas Logos, Inc., Kentucky Logos, L.L.C., Louisiana Interstate Logos, L.L.C., Michigan Logos, Inc., Minnesota Logos, Inc., Mississippi Logos, L.L.C., Missouri Logos, Montana Logos, Nebraska Logos, Inc., Nevada Logos, Inc., New Hampshire Logos, L.L.C., New Jersey Logos, L.L.C., New Mexico Logos, Inc., Ohio Logos, Inc., Oklahoma Logos, L.L.C., South Carolina Logos, Inc., Tennessee Logos, Inc., Utah, Logos, Inc., Virginia Logos, Inc., and Wisconsin Logos, L.L.C., is currently responsible for the administration and operation of:

- 23 State Transportation Agency statewide Specific Service Sign programs,
- 4 Turnpike/Toll Authority Specific Service Sign programs,
- 3 local municipality Specific Service Sign programs, and
- 14 State Transportation Agency statewide Tourist-Oriented Directional Sign (TODS) programs.

Collectively, we hereby submit the following comments detailing our positions on the Notice of Proposed Amendments (NPA) Items #283 - #294 and the draft revisions to Chapter 2J. Specific Service Signs and Chapter 2K. Tourist-Oriented Directional Signs of the Manual on Uniform Traffic Control Devices (MUTCD).

Chapter 2J. Specific Service Signs

NPA Item #284 – Of the 37,000+ participants in the 23 statewide Specific Service Sign programs for which we are responsible, there are only two (2) 24-hour pharmacies participating.

NPA Item #285 – Of the 37,000+ participants in the 23 statewide Specific Service Sign programs for which we are responsible, there are only two (2) 24-hour pharmacies participating.

We agree with the portion of paragraph 1 of NPA Item #285 and the new language as shown in Section 2J.02 of the marked up version of the MUTCD prohibiting the display of distance information on the mainline Specific Service signs.

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We oppose paragraph 3 of NPA Item #285 (restated below in italics) and any changes which would result from this statement, both those shown in the marked-up version of the MUTCD and those not shown.

“FHWA also proposes Standard, Guidance, and Support statements limiting the allowable number of business identification sign panels for each Specific Service to six and recommending that when there are more than six eligible facilities for one or more categories of service, General Service signs for those services should be used instead. The proposed Support statement explains that Specific Service signs are intended for areas primarily rural in character, and that when services at an interchange are abundant, the character of the area is no longer primarily rural and the need to identify specific types or brands of facilities is generally unnecessary and General Service signs would be more appropriate.”

It should be noted that the changes in the marked-up version of the MUTCD do not align with the first statement limiting the allowable number of business identification sign panels for each Specific Service to six (6). Instead, the language in the marked-up version of the MUTCD continues to provide transportation agencies flexibility to fully utilize the Specific Service signs at an interchange by allowing the continuance of a specific service type to appear on up to two (2) Specific Service signs on the approach to an interchange as long as: 1. no more than twelve (12) business identification panels of a specific service type are displayed on an approach; 2. no more than six (6) business identification panels are displayed on a single Specific Service sign; and 3. no more than four (4) Specific Service signs are installed on an approach. In the 23 statewide Specific Service Sign programs for which we are responsible, we currently have almost 4,000 locations participating under this provision providing additional information to the motorist to make travel safer and more efficient.

The statement that, *“Specific Service signs are intended for areas primarily rural in character,”* is redundant and already expressed in Section 2J.01. Additionally, an argument could be made that Specific Service Signs are equally important, if not more important, in urban areas given the potential complexity of urban roadway and interchange design. In urban areas, Specific Service Signs provide motorists not only with information about which interchanges provide essential services, but also signal to the motorists which interchanges are designed to allow for convenient reentry to the freeway or expressway to continue in the same direction of travel. 22 of the 23 statewide Specific Service Sign programs for which we are responsible allow signing in urban areas without problems or issues.

We recommend striking the following language as shown in the marked-up version of the MUTCD Section 2J.02:

~~Specific Service signs are intended for areas primarily rural in character. When services at an interchange are abundant, this is an indication that the character of the area is no longer primarily rural and General Service signs would be more appropriate.~~

We oppose paragraph 4 of NPA Item #285 and the changes shown in the marked-up version of the MUTCD limiting ATTRACTION Specific Service signs to no more than 4 business identification sign panels. Specific Service Signs often serve as reinforcement or confirmation of an available service or attraction to a motorist as much as identification of available services or

attractions. Many transportation agencies promote the use of ATTRACTION signing to eliminate sign clutter and consolidate signing for some locations that otherwise might be signed on stand-alone supplemental guide signs.

We recommend striking the following language as shown in the marked-up version of the MUTCD Section 2J.02:

Guidance:

~~*Due to the unique and widely varying characteristics of the services that qualify as attractions, and lesser recognition of their business identification sign panels (see Paragraph 10), ATTRACTION Specific Service signs should have no more than four business identification sign panels.*~~

Support:

~~*The types of services that meet the definition of attraction, i.e. those providing amusement, historical, cultural, or leisure activities to the public, vary considerably. In most cases, attractions do not include well known services or easily recognizable logos, making it more difficult and requiring more time to distinguish between types of attractions shown on an ATTRACTION sign than for other categories of Specific Service signs.*~~

NPA Item #286 – We support paragraph 1 of NPA Item #286 and the resulting changes in the marked-up version of the MUTCD to promote consistency between the logo sign panel and the on-premise business identification signs.

We would also encourage consideration of further editing this Section 2J.03 as shown below to allow for additional flexibility for those participants with a word message business identification sign panel to use a color scheme that more closely matches or aligns with their on-premise signing and/or provides contrast with the blue background panel.

*A word message business identification sign panel, not using a logo or trademark, should have a ~~single color~~**blue** background with a ~~single color~~**white** legend and border.*

We support paragraphs 3 and 4 of NPA Item #286 and the resulting changes in the marked-up version of the MUTCD prohibiting certain supplemental messages on business identification sign panels and the display of messages related to the promotion or availability of logo space on Specific Service signs.

In paragraph 6 of NPA Item #286, we support revising the Guidance provision regarding the legend and background color of supplemental messages to add consistency and improve motorists' ability to recognize supplemental information that is critical to their decision making; however, we would like to offer the following proposed revision:

~~*The s*~~*Supplemental messages indicating hours of operation should be displayed in a black legend on a yellow background for that portion of the business identification sign.*~~*Supplemental messages indicating days of*~~

the week a business is closed should be displayed in a white legend on a red background for that portion of the business identification sign. Supplemental messages indicating alternative fuels available should be displayed in a white legend on a green background for that portion of the business identification sign. Supplemental messages indicating RV Access should be displayed in a white legend on a black background for that portion of the business identification sign.

Figure 2J-3. Examples of Supplemental Messages on Business Identification Sign Panels



We support paragraph 8 of NPA Item #286 and the resulting changes in the marked-up version of the MUTCD that prohibit a business identification sign panel from displaying the identification logo/trademark or name of more than one business.

NPA Item #287 – **We oppose paragraph 2 of NPA Item #287** and the changes shown in the marked-up version of the MUTCD. The design and length of exit ramps varies greatly, and establishing an arbitrary longitudinal distance could significantly impact providing motorists with information designed to make travel safer and more efficient.

We recommend striking the following language as shown in the marked-up version of the MUTCD Section 2J.06:

~~*Specific Service ramp signs should be spaced at least 200 feet longitudinally from any Destination guide signs along the ramp. Longer longitudinal spacing should be provided between Specific Service ramp signs and any warning or regulatory signs along the ramp, and any intersection traffic control devices at the ramp terminal.*~~

NPA Item #288 – We support paragraphs 1 and 2 of NPA Item #288 and the resulting changes in the marked-up version of the MUTCD to provide greater flexibility regarding ramp signs and the display of distances on ramp signs.

We oppose paragraph 4 of NPA Item #288 and the changes shown in the marked-up version of the MUTCD eliminating the option to use an exit number plaque on Specific Service signs. The use of exit number plaques provides greater flexibility, as well as, when used, reduces the overall square footage of the Specific Service sign, thus creating potential savings for the transportation

agencies in the cost of the actual background panel and, in many cases, the support systems as well.

We recommend this Option remain in the MUTCD Section 2J.07:

Option:

An exit number plaque (see Section 2E.31) may be used instead of the exit number on the signs located in advance of an interchange.

NPA Item #289 – ***We oppose NPA Item #289*** and the changes shown in the marked-up version of the MUTCD, and we believe the entire new Section 2J.09 should be stricken. This language also appears in NPA Item #211 and in new Section 2E.36 Collector-Distributor Roadways for Successive Interchanges. The language should be stricken in 2E.36 as well.

Should the decision be made to retain this new Section, we recommend the following changes to Section 2J.09 replacing the General Service signs on the mainline with Specific Service signs and providing additional flexibility for the transportation agencies. These changes should also be reflected in new Figure 2J-4 and Figure 2E-32.

Section 2J.09 Collector-Distributor Roadways for Successive Interchanges

Support:

Examples of guide signs for a collector-distributor roadway that provides access to multiple interchanges are shown in Figure 2J-4.

Guidance:

No more than four Specific Service signs should be displayed on a highway mainline approach to a collector-distributor roadway, regardless of the number of interchanges that are accessed from the collector-distributor roadway.

Guidance:

Where mainline access to successive interchanges is provided from a single collector-distributor roadway (see Section 2E.36), Specific Service signs, if used, should be ~~limited to~~ located ~~ions~~ along the collector distributor roadway in advance of each interchange in compliance with the provisions of Sections 2J.07 and 2J.08.

Specific Service signs and business identification sign panels should not be displayed along a collector-distributor roadway unless also displayed on the highway mainline approach to that collector-distributor roadway.

~~If services are available from more than one of the interchanges along the collector-distributor roadway and those services are signed with Specific Service signs as described in Paragraph, then General Service signs should be used on the mainline in conformance with the provisions of Chapter 2I.~~

Standard

~~If Specific Service signs are located on the highway mainline for an interchange that is accessed from a collector-distributor roadway, then additional Specific Service signs shall not be allowed along the collector-distributor roadway. No more than four Specific Service signs shall be displayed on a highway mainline approach to a collector-distributor roadway, regardless of the number of interchanges that are accessed from the collector-distributor roadway.~~

Chapter 2K. Tourist-Oriented Directional Signs

NPA Item #292 – We encourage consideration of changing the following Standard in Section 2K.01 to Guidance. As a practitioner, verifying this requirement has proven difficult and subjective.

~~Standard~~*Guidance:*

A facility ~~should~~shall be eligible for tourist-oriented directional signs only if it derives its major portion of income or visitors during the normal business season from road users not residing in the area of the facility.

We oppose adding the words “or urbanized,” as this term is undefined and subjective. Additionally, several of the statewide TODS programs for which we are responsible currently allow signing in what could be considered “urbanized” areas without problems or issues.

Standard:

The use of tourist-oriented directional signs shall be limited to rural highways (see definition in Section 1C.02). Tourist-oriented directional signs shall not be installed on conventional roads in urban ~~or urbanized~~ areas or on freeway or expressway main roadways or ramps.

NPA Item #293 – We support the option to use recreational and cultural interest area symbols on tourist-oriented directional signs; however, we encourage consideration to making these symbols white on a blue background rather than white on a brown background in Section 2K.02.

Standard:

When used, recreational and cultural interest area symbols shall be white on a ~~brown~~blue background.

We also encourage consideration to increasing the allowable symbol height from 15 to 18 inches to match typical 4:3 sign dimension ratio in Section 2K.02.

Business identification sign panels shall not exceed 24 inches in width and ~~15~~18 inches in height.

Alternatively, this new language could be changed from Standard to Guidance.

Business identification sign panels ~~shall~~ should not exceed 24 inches in width and 15 inches in height.

NPA Item #294 – ***We oppose NPA Item #294*** and the changes shown in the marked-up version of the MUTCD. The research completed by the Quebec Ministry of Transport and cited as support for reducing the number of signs per assembly from four (4) to three (3) used laboratory driving simulations with sign designs that have significant differences to the design, location, and application of tourist-oriented directional signs as outlined in the MUTCD. Additionally, several of the statewide TODS programs for which we are responsible currently allow sign assemblies with four (4) signs without problems or issues.

We recommend the original language of four (4) vs. three (3) be restored as follows in Section 2K.04:

*The number of signs installed in each assembly should not exceed ~~three~~
four.*

Thank you for allowing us the opportunity to provide these comments. If you have any questions, need any clarification, or need any additional information, please do not hesitate to contact me at (866) 963-3775 or by email at fwilliams@interstatelogos.com.

Sincerely,



Floyd Williams
President, ***Interstate Logos, L.L.C.***