Pennsylvania Manufacturers' Association

May 4, 2021

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

Re: Comments for Docket No. FHWA-2020-0001 Notice of Proposed Amendment (NPA) on the Manual on Uniform Traffic Control Devices (MUTCD)

The Pennsylvania Manufacturers' Association (PMA) supports the adoption of the 11th edition of the Manual on Uniform Traffic Control Devices (MUTCD). Founded in 1909, PMA is the nonprofit, statewide trade organization representing the manufacturing sector in Pennsylvania's public policy process. Headquartered just steps from the state capitol in Harrisburg, PMA works to improve Pennsylvania's ability to compete with other states for investment, jobs, and economic growth.

Pennsylvania's manufacturers are at the forefront of transportation innovation that will help move our country forward. PMA applauds the Federal Highway Administration for their work on the proposed 11th edition on the MUTCD. Specifically, we appreciate the need to improve roadway safety and prepare roadways for vehicle automation systems.

As the future of autonomous and assisted-driving technologies is developed and deployed, there is need for advanced coating technologies. For example, road markings serve as either a primary or secondary guide in all vehicle automation system technologies. These markings must deliberately provide consistent and clear delineation of intended vehicle paths. We fully support the FHWA's emphasis to tighten uniformity of national road marking standards to support automated vehicle deployment.

PMA supports the following proposed changes to the MUTCD, all designed to tighten national uniformity to improve roadway safety and begin to prepare roadways for vehicle automation systems:

- Using 6-inch-wide markings on interstates, freeways, and expressways; and
- Using 6-inch-wide edge lines on conventional two-lane highways; and
- Using dotted edge lines along exit and entrance ramps; and
- Placing chevron markings in gore areas; and
- Eliminating the use of intermittent markings as a substitute for continuous markings.

These proposals will enable driver assistance and fully automated vehicle systems to address the most common fatal crash type in the US, single vehicle lane departures. These crash types can be

reduced by as much as 66 percent, depending on technology adoption rates and roadway readiness levels.[1]

In addition to the benefits these proposals provide in support of machine vision systems, the proposed MUTCD changes to tighten uniformity of national road marking standards have also been shown to reduce single vehicle lane departures on two-lane highways for human-led vehicles.[2]

In the FHWA study where data were analyzed from three states that adopted 6-inch-wide edge lines, total lane departure crashes were reduced 15 to 30 percent, while fatal and serious injury crashes were reduced 15 to 37 percent.[3]

For these reasons, PMA supports the adoption of the 11th edition of the Manual on Uniform Traffic Control Devices (MUTCD). We appreciate the ability to publicly comment on these important proposals.

Sincerely,

David N. Taylor
President & CEO

[1] Penmetsa, P., Hudnall, M., and Nambisan, S. (2019). Potential safety benefits of lane departure prevention technology. *International Association of Traffic and Safety Services Research*, *43*(1), pp. 21–26
[2] Report FHWA-HRT-12-048
https://www.fhwa.dot.gov/publications/research/infrastructure/pavements/12048/12048.pdf
[3] ibid.