

May 14, 2021

The Honorable Stephanie Pollack, Acting Administrator
United States Department of Transportation
Federal Highway Administration
1200 New Jersey Avenue S.E.
Washington, D.C. 20590

FHWA 2020-0001-0001—Manual on Uniform Traffic Control Devices; Revision

Dear Acting Administrator Pollack:

The Specialized Carriers & Rigging Association (SC&RA) thanks the Federal Highway Administration for its long-awaited efforts to revise the Manual on Uniform Traffic Control Devices (MUTCD).

SC&RA is an international trade association of more than 1,400 members from 46 nations. Members are involved in crane and rigging operations, specialized transportation, machinery moving and erecting, industrial maintenance, millwrighting, concrete pumping, manufacturing, and rentals.

Every day, our members rely upon a safe and efficient interstate and national highway system to ensure critical high, wide, and heavy freight is delivered securely. This includes delivering the concrete that builds these highways, erecting the steel structures that grace our urban skylines, and installing the generators that power our energy sources – *our members lift and move the world*.

Working directly with state departments of transportation the complex moves required to transport these loads require extensive, sophisticated route planning to ensure the safety of our fellow motorists and the integrity of the nation's highway infrastructure. This often involves thorough analyses of all potential impediments to the safety of the motoring public, the driver, and the roads, including bridge weight tolerances and vertical obstructions.

Therefore, SC&RA relies on standardized signage and other critical markers along these routes to ensure our industry continues to operate as safely and efficiently as possible.

Respectfully submitted,



Chris Smith
Vice President Transportation

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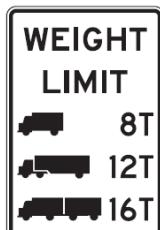
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Comments on Proposed Changes

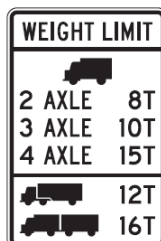
Section 2B.66 – Weight Limit Signs



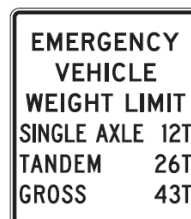
R12-1



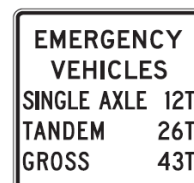
R12-5



R12-6



R12-7



R12-7aP

FHWA Proposed Standard:

The symbols shown on the R12-5 and R12-6 Weight Limit sign shall apply to all trucks of that configuration (single-unit, single-trailer, or multi-trailer) regardless of the shape of the vehicle. Symbolic representations of other vehicle shapes or modifications of standard symbols shall not be used.

SC&RA Comment:

Because most specialized transportation loads moved by SC&RA members far exceed the weight limits these signs are intended to convey, our industry must first depend on the accurate routing of the transportation agency issuing the carrier a special hauling permit to avoid these limits in the first place. Nonetheless, SC&RA supports the standardization of such signs as a positive safety measure. In the event an inaccurate permit is issued, it presents our carriers from avoiding an unsafe route. Additionally, it may also prevent inexperienced or less reputable carriers evading safe permitting practices from violating these postings to the benefit of industry and motorists alike

Proposed FHWA Standard

If the R12-5 sign depicts only one single-unit vehicle symbol, the weight limit associated with that single-unit vehicle symbol shall apply to all single-unit vehicles, regardless of number of axles. The weight limit associated with the single-trailer vehicle symbol shall apply to all single-trailer vehicles, regardless of number of axles or vehicle shape. The weight limit associated with the multi-trailer vehicle symbol shall apply to all multi-trailer vehicles with two or more trailers, regardless of number of axles or vehicle shape.

SC&RA Comment:

As noted above, SC&RA member carriers should rarely encounter these signs on a permitted route. However, SC&RA notes the general principle that presence of additional axles allows for higher weight tolerance with respect to the safety and integrity of the roadway and structure, and that the deployment of additional specialized equipment (e.g., bridge jumpers) significantly mitigate physical damage to infrastructure used by overweight commercial vehicles.

Proposed FHWA Standard

If used, the Weight Limit sign (see Figure 2B-29), with an advisory distance ahead legend, shall be in advance of the applicable section of highway or structure so that prohibited vehicles can detour or turn around prior to the limit zone.

SC&RA Comment:

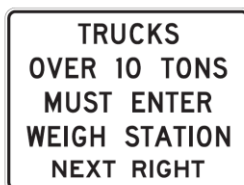
As noted above, SC&RA member carriers should rarely encounter these signs on a route permitted for overweight travel. Nonetheless, SC&RA supports this safety measure as noted in the prior comments.

Proposed FHWA Standard

When mounted below a primary Weight Limit sign the Emergency Vehicle Weight Limit plaque (R12-7ap) shall be used.

SC&RA Comment:

The maximum GVW noted on sign R-12-7Ap, 43 T, or 86,000 lbs., exceeds the legal weight of a commercial vehicle in most states and the interstate highway system. This may cause some confusion from time to time with permitted loads that are not otherwise considered emergency vehicles. SC&RA also notes that during national emergencies such as the COVID-19 pandemic or natural disaster relief, specialized transportation carriers are often moving emergency commodities and thus may at times be considered an "emergency vehicle."



SC&RA Comment:

SC&RA supports the option to modify this sign to "Inspection Station" in recognition of the technological advances of commercial weight enforcement activities no longer requiring a stop at a physical location.

Section 2C.25 – Low Clearance Signs



Proposed FHWA Standard:

If used, the Low Clearance Overhead (W12-2b) sign shall indicate the portion of the structure with low clearance if the posted clearance does not apply to the entire structure.

SC&RA Comment:

SC&RA supports the standardization of posting the location of the lowest clearance on a structure. As witnessed in the 2013 I-5 Skagit Bridge collapse, an overweight commercial vehicle struck a portion of the bridge truss lower than the posted clearance.

SC&RA remains concerned, however, with lack of standardization regarding the policies and procedures used to survey and post vertical clearances. Many bridge hits still occur because of inaccurate postings and inaccurate routing. SC&RA directs FHWA to its **Vertical Clearance Task Force Recommendations**, found in **Appendix 1** of these comments for further information.

Section 2D.51: Weigh Station

Figure 2D-24. Example of Weigh Station Signing - Conventional Road

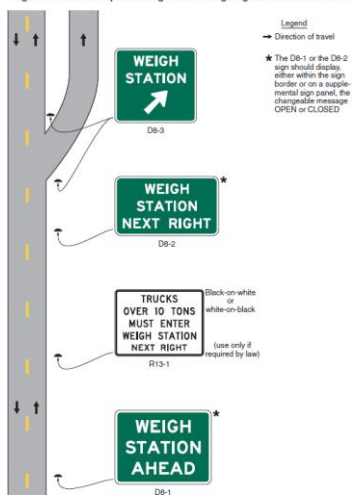


Figure 2E-61. Example of Weigh Station Signing on Freeways



Proposed FHWA Standard:

The standard installation sequence of signing for a Weigh Station signing on a conventional highway shall include three basic signs (see Figure 2D-24):

- Advance Weigh Station Distance sign (D8-1) sign,
- Exit Direction Sign Weigh Station Next Right (D8-2) sign, and
- Exit Gore Sign Weigh Station Exit Directional (D8-3) sign.

When the WEIGH STATION legend of the D8 series signs is replaced with the COMMERCIAL VEHICLE INSPECTION AREA legend, as provided in Paragraph 6 of this Section, the WEIGH STATION legend of the R13-1 sign shall be replaced with the alternate legend INSPECTION AREA.

SC&RA Comment:

SC&RA supports the standardization of weigh station markings and wayfinding signs. As noted in a previous comment, many weight enforcement activities are now mobile and off site from physical weigh stations. SC&RA applauds this recognition of technological advancements in FHWA MUTCD policies.

Section 2I.15 Signing for Truck Parking Availability (D9-16b through D9-16e)

Figure 2I-9. Examples of Truck Parking Availability Signs

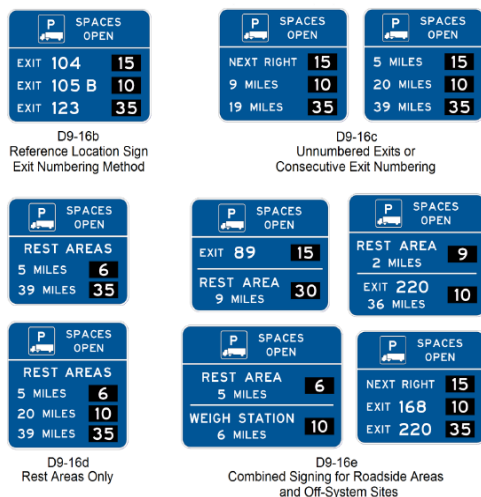
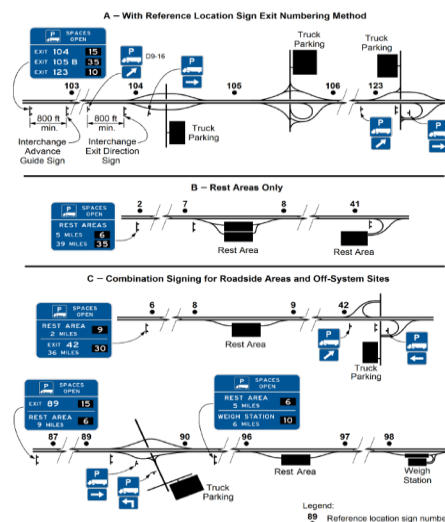


Figure 2I-10. Examples of Use of Truck Parking Availability Signs
(shown for one direction of travel)



Proposed FHWA Standard:

The Truck Parking Availability General Service (D9-16b through D9-16e) sign (see Figure 2I-9) shall include a changeable message element with a white changeable legend on a black opaque background that displays only the number of parking spaces currently available at each location or the legend FULL.

The upper section of the sign shall display the Truck Parking (D9-16) symbol sign and the legend SPACES OPEN. The sign shall display the number of available truck parking spaces for no more than three parking facilities. Where two lines of legend, such as the location and a distance, are displayed for a parking facility, not more than two parking facilities shall be displayed on the sign. Where the truck parking facility is located off the main highway and is accessed from the crossroad, directional assemblies with the Truck Parking (D9-16) sign shall be installed along the ramp and along crossroads where the route to the facility requires a direction change, where it is questionable as to which roadway to follow, or where additional guidance is needed.

SC&RA Comment



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SC&RA supports standardization of digital truck parking and facility way finding signs. While recent changes to FMCSA Hours of Service rules for commercial vehicle drivers has introduced some flexibilities, the lack of safe truck parking remains a critical problem for our entire industry. Throughout the COVID-19 pandemic, many states loosened truck parking restrictions at state facilities to enable our operators the option to bobtail their load and seek rest accommodations offsite. A standardized information sign at these facilities would be useful.

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Appendix 1: SC&RA Vertical Clearance Task Force Recommendations

Vertical Clearance Task Force

In 2020, SC&RA assembled a Vertical Clearance Task Force, consisting of a diverse group of government and industry officials to research and make recommendations to governments designed to reduce bridge hits through improved harmonization of policies & procedures related to the movement of over height loads.

Key Findings

- I. Several states do not presently track bridge hits nor have formal procedures in place for identifying or investigating bridge hits. The program currently implemented by the Idaho Transportation Department should be viewed as a case study for best practices nationwide.
- II. A diverse lack of harmonization exists between states policies about over-height structures, permitting policies, etc.
- III. New technology is emerging. While the task force does not recommend any specific technology, it recommends further study and piloting of such technology by State and Federal Departments of Transportation, including:
 - a. 3D Vertical Measurement Systems designed for oversize loads to accurately measure dimensions in locations including weigh stations, ports, manufacturing facilities.
 - b. Roadside over height detection/warning systems currently piloted in states like Texas and New York.
 - c. Audible Turn by Turn Permit Route Instructions.

12 recommendations all State Departments of Transportation

1. All bridges **under 16' 6" H must be marked with actual height**. Markings and/or signage must be displayed in a manner that is visible to the motoring public.
2. All bridges **under 14' H must also have warning signs posted prior** to the structure.
3. The distance between actual bridge height and maximum permitted height shall be 3" for all states. Note: Exceptions can be made, but only with proper planning and coordination between the carrier and the permit office.
4. Construction and maintenance projects shall not be designated as complete until all bridge clearances have been remeasured using consistent methods and permitting systems and bridge height listings have been updated.

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- a. Update processes and technology to provide for checks and balance requirements to ensure compliance.
5. If the permitted route requires that a bridge be ramped due to insufficient clearance, that portion of the route and the requirement shall be listed in **bold** print to designate its importance.
6. If the permitted route requires that a structure be crossed under in a specific lane, that portion of the route and the requirement shall be listed in **bold** print to designate its importance.
7. States to consider using advanced technology such as Lidar or lasers for measurements to ensure accuracy and consistency. All measurements should have a defined process so that all measurements are obtained using consistent methods.
8. All states shall use an automated routing & permit system to further protect infrastructure and the motoring public. Automated permitting:
 - a. Reduces human error.
 - b. Decreases time required to obtain permits.
 - c. Improves efficiency of the permit process.
 - d. Allows for permit issuance for emergency responses.
 - e. Allows staff to work on difficult issues instead of issuing routine permits
9. All states shall make bridge heights electronically accessible and designate if the heights provided are actual bridge heights or max permitted heights.
10. All states to provide for audio turn by turn navigation of each issued permit.
11. All states shall require pilot car certification.
 - a. Specific requirements to operate as a high pole pilot car.
 - b. States may add regulation that requires certification from another state that has a satisfactory program in place.
12. Request planning to require a standard bridge height minimum clearance on interstates and US highways to be no less than 18'. This would allow for most high loads to stay on major roadways and would reduce congestion, improve efficiency and safety, and reduce emissions.

States shall review permitted and freight travel routes to identify trouble spots that impede efficiency for freight movement. District personnel, state engineers, and permit officials should gather data to look for opportunities to reduce miles traveled on secondary roads and prioritize available funds to raise clearances or upgrade bridges to eliminate problem areas.

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