



March 26, 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 Ohio Manufacturers' Association (OMA) is hereby providing its written comments to U.S. Department of Transportation's Notice of Proposed Amendment on the Manual on Uniform Traffic Control Devices. The OMA is a 110-year-old trade association that is dedicated to protecting and growing manufacturing in Ohio. We appreciate the opportunity to provide comments on the proposed amendment.

Ohio manufacturers are at the forefront of transportation innovation that will help move our country forward. OMA applauds the Federal Highway Administration for their work on the proposed 11th edition on the MUTCD. In particular, we appreciate the need to improve roadway safety and prepare roadways for vehicle automation systems. In this regard, OMA offers the following comments.

As we look toward the future of autonomous vehicle technology, 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.

More specifically, OMA 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,
- Using 6-inch wide edge lines on conventional two-lane highways,
- Using dotted edge lines along exit and entrance ramps,
- 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.

In this regard, OMA supports the adoption of the 11th edition of the Manual on Uniform Traffic Control Devices (MUTCD). We appreciate your consideration of the above comments. Thank you.

Sincerely,



Robert Brundrett
Managing Director, Public Policy Services

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)

<https://www.fhwa.dot.gov/publications/research/infrastructure/pavements/12048/12048.pdf>