



January 4, 2021

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

Re: Extension of Commenting Period for Docket No. FHWA-2020-0001

Dear Administrator Nason:

The American Traffic Safety Services Association (ATSSA) join the National Committee on Uniform Traffic Control Devices (NCUTCD) in requesting an extension of the docket period from 90 days to 180 days for the Notice of Proposed Amendments (NPA) that will ultimately result in the 11th edition of the Manual on Uniform Traffic Control Devices (MUTCD).

ATSSA is a member partnership comprised of approximately 1,500 companies representing over 11,000 industry professionals in sign manufacturing, pavement marking, guardrail and barrier, traffic services and traffic signals. ATSSA's Core Purpose is To Advance Roadway Safety and eliminate all roadway fatalities. Our members are on the front lines in temporary traffic control zones and the invention, manufacture, sale and installation of most of the traffic control devices used on our nation's roadways.

ATSSA serves as a voting member of the NCUTCD which recommends to the Federal Highway Administration and to other appropriate agencies proposed revisions and interpretations to the MUTCD and other accepted national standards. The NCUTCD develops public and professional awareness of the principles of safe traffic control devices and practices and provides a forum for qualified individuals with diverse backgrounds and viewpoints to exchange professional information.

In developing its recommendations, ATSSA uses a similar consensus-building process as the NCUTCD, which provides the opportunity for input from all members of our diverse membership. To respond to the docket, this process will require review of all the proposed changes to the MUTCD, development of draft responses within the six Technical Committees, approval of those responses by the ATSSA Board of Directors and submission of all the recommendations to the docket.

The NPA has 647 numbered items, and the marked-up text of the proposed changes to the MUTCD is 784 pages long. It should be noted that the 2008 NPA, which lead to the 2009 MUTCD, had 513 numbered items, and its docket period was 180 days; yet, with the more

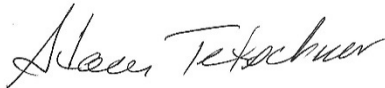
extensive current NPA, only one-half of the time is being afforded for the development of a response.

The MUTCD is an extremely important document to our members as it lays the foundation of many of members businesses and we want to provide them enough time to review all comments. The quality of input is enhanced by our consensus-building process, but time must be afforded for this process to best be utilized. We believe that the simple addition of 90 days to the docket period is appropriate to ask for the value of this process to be realized as this update will provide the necessary standards, guidelines and recommendations for our industry in the years to come.

Additionally, the NPA was published just 11 days before Christmas. As such, the 90-day period includes one of the most important holiday periods of the year when many are taking extended time off to be with family. Thus, the effective time available for meaningful work on review of the NPA and development of the response to the docket is in fact shorter than would be the case at another time of the year.

For all these reasons, ATSSA joins the NCUTCD in respectfully requesting that the docket period be extended from 90 days to 180 days for the subject NPA. Thank you for your consideration of this request.

Sincerely,

A handwritten signature in cursive script, appearing to read "Stacy Tetschner".

Stacy Tetschner
President & CEO