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May 14, 2021

Stephanie Pollack
Acting Administrator
Federal Highway Administration
1200 New Jersey Ave, SE
Washington, DC 20590

(Submitted Via Regulations.gov)

Docket Number FHWA-2020-0001 / RIN 2125-AF85

BNSF Railway Company Comments to National Standards for Traffic Control Devices; the Manual on Uniform Traffic Control Devices for Streets and Highways; Revision, 11th Edition

Dear Acting Federal Highway Administrator Pollack,

The purpose of this letter is to provide formal comment on the Notice of Proposed Amendments, dated December 12, 2020, calling for publication of the next edition of the Manual on Uniform Traffic Control Devices (MUTCD).

First, we support the opinion put forward by AASHTO, ITE, and NCUTCD in their letter to you dated March 11th regarding the need to publish a new MUTCD as soon as possible. The current version was published in 2009 and there have been a multitude of advancements in practice and technology that should be recognized by the manual to leverage them to the maximum extent on the nation's road network. While we support a full reexamination of the structure, process and content of the MUTCD, this should not be done without publication of the next version of the Manual.

Second, BNSF concurs with the work by the Association of American Railroads, the American Short Line and Regional Railroad Association, and the technical experts appointed by us and other railroads who have dedicated countless hours to revision of the document through their collective work on National Committee and other channels. BNSF joins in the comments submitted by AAR and ASLRRRA, with one exception as noted in the attached comments as to section 8A.14. Therefore, please incorporate those comments, attached for reference, into the record on our behalf.

Thank you for the opportunity to provide comment on the Notice of Proposed Amendment. We look forward to their inclusion in the document and its prompt publication. Please do not hesitate to contact me if you have any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read "Paul A. Cristina", with a long horizontal flourish extending to the right.

Paul Cristina