

DEPARTMENT OF TRANSPORTATION
FEDERAL HIGHWAY ADMINISTRATION

DOCKET NO. FHWA-2020-0001
NATIONAL STANDARDS FOR TRAFFIC CONTROL DEVICES; THE
MANUAL ON UNIFORM TRAFFIC CONTROL DEVICES FOR STREETS AND
HIGHWAYS; REVISION

REQUEST FOR EXTENSION OF COMMENT PERIOD BY
THE ASSOCIATION OF AMERICAN RAILROADS

The Association of American Railroads (“AAR”), on behalf of itself and its member railroads, requests an extension of the 90-day comment period specified in the Federal Highway Administration’s (“FHWA”) December 14, 2020, notice of proposed amendments (“NPA”) to the Manual on Uniform Traffic Control Devices (MUTCD).¹ The National Committee on Uniform Traffic Control Devices, the American Railway Engineering and Maintenance-of-Way Association, the American Association of State Highway and Transportation Officials, and other organizations have recently filed extension requests for an additional 90 days to comment.² AAR concurs with those extension requests.

As you are aware, the MUTCD and any updates to such have the potential to impact highway-rail grade crossing safety and are incorporated into the federal railroad safety regulations governing highway-rail grade crossing safety at 49 C.F.R.

¹ AAR is a trade association whose membership includes freight railroads that operate approximately 83% of the line-haul mileage, employ 95% of the workers, and account for 97% of the freight revenues of all railroads in the United States; and passenger railroads that operate intercity passenger trains and provide commuter rail service. 85 Fed. Reg. 80,898 (Dec. 14, 2020).

² See Docket No. FHWA-2020-0001 at www.regulations.gov.

Parts 222 (locomotive horns) and 234 (grade crossing safety). The last time FHWA undertook a full-scale update to the MUTDC in 2008, the NPA specified an approximately seven months comment period.³ Notably, that 2008 NPA contained less proposed revisions (512) to the MUTCD than does the present NPA (647).

Given the vital railroad and public safety interests implicated by the NPA and the amount of time necessary for railroads other highway safety stakeholders to adequately evaluate the impact of the voluminous amount of proposed amendments, and because the NPA here is no less important than that published by FHWA in 2008, FHWA should extend the comment period by at least 90 days.

Respectfully submitted,



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³ 73 Fed. Reg. 268 (Jan. 2, 2008).