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May 13, 2021

Docket Management Facility  
Federal Highway Administration  
U. S. Department of Transportation  
1200 New Jersey Ave. S.E.  
West Building, Ground Floor  
Washington, DC 20590

RE: Docket Number: FHWA-2020-0001-0179, National Standards for Traffic Control Devices: Manual on Uniform Traffic Control Devices for Streets and Highways; Revision

The National Association of County Engineers (NACE), the national voice of county road professionals, wishes to thank FHWA for publishing the Notice of Proposed Amendments (NPA) that will result in the 11<sup>th</sup> edition of the Manual on Uniform Traffic Control Devices (MUTCD), and provides herewith its input to the docket. It has been more than a decade since the last edition of the MUTCD, and there have been no significant revisions to its content in the interim. We, therefore, encourage FHWA to expedite publication of a Final Rule, with regular and targeted revisions of the 11<sup>th</sup> edition once the Final Rule is published.

NACE is a sponsoring organization of the National Committee on Uniform Traffic Control Devices (NCUTCD). A full delegation of NACE members on the NCUTCD Council was present and participated in all of the votes to develop the NCUTCD response to the docket for this rulemaking. NACE is in full agreement with the NCUTCD response, and we encourage FHWA to incorporate the NCUTCD comments on the NPA in the Final Rule. In particular, we endorse the NCUTCD recommended text in Section 3A.04 of the MUTCD regarding longitudinal lines. The NPA proposes that a normal width line shall be 6 inches for all roadways with speed limits greater than 40 MPH regardless of the traffic volume. Implementation of this Standard would impose the need for severe budgetary increases for many county roadway jurisdictions. We believe that the NCUTCD recommended text providing that a normal width line shall be 6 inches for all roadways with speed limits greater than 50 mph and an ADT of 6,000 vehicles per day or greater, provides a Standard with which such jurisdictions can more readily comply, and we strongly recommend its inclusion in the 11<sup>th</sup> edition of the MUTCD.

Thank you for your consideration of these comments on this NPA.

Todd Kinney, PE  
President  
NACE

Kevan Stone  
CEO/Executive Director  
NACE