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March 26, 2021

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

Dear Acting Administrator Pollack:

We encourage you to allow the ongoing NPA public comment period to continue, resulting in the quickest possible publication of a new MUTCD. The need for national policy that establishes uniformity in traffic control devices is paramount to ensuring safety for all road users. We believe that the proposed amendments and the process for its formation and review move us in the right direction to achieve the goals of a uniform and safe transportation system for all modes of transportation.

The MUTCD serves numerous policy and technical roles and is used by a broad range of practicing transportation professionals, public and private sector, and at all levels of government across the United States. The National Committee on Uniform Traffic Control Devices (NCUTCD) has a broad membership, evidencing the large and diverse stakeholder community critical to informing the continued evolution of such a document. Within that stakeholder community, the Institute of Transportation Engineers, and the American Association of State Highway and Transportation Officials represent a notable fraction of this organization. Georgia DOT is fortunate to have numerous ITE members and many staff active in AASHTO committees.

Recognizing that the current version of the MUTCD was drafted some 13 years ago, the transportation community and consequently the traveling public – regardless of mode - desperately need an update. During this decade there have been many advancements in transportation that simply were not a part of our transportation landscape 13 years ago, and consequently are not in the current MUTCD. These advancements, if well-integrated into the next edition, have the potential to save numerous lives and prevent serious injuries on the nation's transportation system.

As the extended comment period continues, USDOT is receiving relevant input to help ensure that this new MUTCD will be as timely and relevant as possible. This input is coming from a constituency even broader than the NCUTCD, including thousands of volunteer person-hours invested by those serving on the NCUTCD on behalf of member organizations, including ITE, AASHTO, NACTO, and others. The NCUTCD discussions that have already occurred have been well attended; discussions have been open and honest. To essentially dismiss this and other efforts to-date in developing useful, thoughtful comments by rescinding the NPA and starting over again not only dismisses years of important work by FHWA and countless volunteers, but also misses the opportunity to save lives now.

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The concept of a broad reassessment of the MUTCD is reasonable and is not without precedent, but please allow the process underway – with input from that broad constituency – to reach its conclusion: a new MUTCD.

We agree that the current process of developing new editions of the MUTCD is one which begs for streamlining. Given the rapid pace of technological advancement, the prospect of a new MUTCD every 10 years is wholly inadequate. A new MUTCD must meet the needs of all transportation users, regardless of mode, and should expand upon the ongoing initiatives to address rapidly changing technology in the MUTCD. As such, it is reasonable that the NPA process and publishing of the new manual continue.

We thank you for your leadership and appreciate your consideration of this matter, to the end of enhancing safety for all road users.

Sincerely,

A handwritten signature in blue ink that reads "Meg B. Pirkle". The signature is fluid and cursive, with the first name "Meg" being the most prominent.

Meg B. Pirkle, P.E.
Chief Engineer