



May 6, 2021

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

Re: Comments for Docket No. FHWA-2020-0001
Notice of Proposed Amendment (NPA) on the Manual on Uniform Traffic Control
Devices (MUTCD)

Thank you Administrator Nason for the opportunity to comment on the Federal Highway Administration's (FHWA) update to the MUTD. Wisconsin Manufacturers and Commerce (WMC) is the state chamber of commerce, manufacturers association, safety council, and the largest general business association in Wisconsin. We were founded over 100 years ago, and are proud to represent approximately 3,800 member companies of all sizes, and from every sector of our economy. Our mission is to make Wisconsin the most competitive state in the nation in which to do business. WMC has been engaged in the process of making Wisconsin roadways more compatible with autonomous vehicles and safer for all roadway users, which is why we are commenting on the proposed amendments.

WMC appreciates the work done by the FHWA on the proposed 11th edition on the MUTCD. Specifically, WMC applauds the FHWA's proposed updates to the MUTCD, emphasizing the need to improve roadway safety and begin to prepare roadways for vehicle automation systems. In this regard, WMC offers the following comments.

With autonomous vehicles being one of the most significant transformations in the transportation space, the amendments under consideration are needed to make sure our roads are marked in a uniform manner with the appropriate type of coating to make sure we have safe and modern roads. These markings must deliberately provide consistent and clear delineation of intended vehicle paths. We fully support the FHWA's emphasis to tighten uniformity of national road marking standards to support automated vehicle deployment.

More specifically, WMC supports the following proposed changes to the MUTCD, all designed to tighten national uniformity to improve roadway safety and begin to prepare roadways for vehicle automation systems:

- Using 6-inch wide markings on interstates, freeways, and expressways,
- Using 6-inch wide edge lines on conventional two-lane highways,
- Using dotted edge lines along exit and entrance ramps,
- Placing chevron markings in gore areas, and
- Eliminating the use of intermittent markings as a substitute for continuous markings.

These proposals will enable driver assistance and fully automated vehicle systems to address the most common fatal crash type in the US, single vehicle lane departures. These crash types can be reduced by as much as 66 percent, depending on technology adoption rates and roadway readiness levels.¹

In addition to the benefit these proposals provide in support of machine vision systems, the proposed MUTCD changes to tighten uniformity of national road marking standards have also been shown to reduce single vehicle lane departures on two-lane highways for human-led vehicles.² In the FHWA study where data were analyzed from three states that adopted 6-inch wide edge lines, total lane departure crashes were reduced 15 to 30 percent, while fatal and serious injury crashes were reduced 15 to 37 percent.

In this regard, WMC supports the adoption of the 11th edition of the Manual on Uniform Traffic Control Devices (MUTCD). We appreciate your consideration of the above comments and are available to answer any questions. Thank you.

Sincerely,

/s/ Kurt R. Bauer
President & CEO

¹ Penmetsa, P., Hudnall, M., and Nambisan, S. (2019). Potential safety benefits of lane departure prevention technology. *International Association of Traffic and Safety Services Research*, 43(1), pp. 21–26.

² Report [FHWA-HRT-12-048](https://www.fhwa.dot.gov/publications/research/infrastructure/pavements/12048/12048.pdf)

<https://www.fhwa.dot.gov/publications/research/infrastructure/pavements/12048/12048.pdf>