Please use this form to provide comments on the Notice of Proposed Amendments for the MUTCD.

**INSTRUCTIONS:**

1. Add your name or organization name where indicted in the footer of this form.
2. Use Table 1 to provide your original comments.
3. Use Table 2 to indicate your agreement with a comment that another commenter has submitted to the docket.
4. Do not adjust formatting of the rows and columns; text will automatically wrap and expand the row height as you type.
5. To add rows to this form, use the “Insert Rows” function, or hover just outside the left edge of the row below which you would like to add a row and click the encircled “+” that appears.
6. If you choose to provide a letter to accompany this comment form, please **print the document as a PDF**; **please do not scan a hard copy**. This will assist FHWA with cataloging your comments.

**TABLE 1. ORIGINAL COMMENTS ON PROPOSED CHANGES.** Please indicate the applicable proposed Section numbers in the far-left column. In the next three columns, please indicate your agreement, disagreement, or whether the column is applicable to your response by placing a, “YES,” “NO,” or “N/A” in the appropriate column of the row. If you agree with a proposed change, then there is no need to fill out the additional columns beyond the first two. However, it can be helpful to explain why you agree with a proposed change based on your objective experience as a roadway operator and/or empirical data. If you disagree in part or in whole, then please provide additional information that FHWA may find helpful.

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| --- | --- | --- | --- | --- |
| Proposed  Section Number(s) | Agree with concept and text as proposed | Agree with concept; suggested rewording of text in Comments | Disagree with concept | Comments  *Please include justification for your position based on objective experience and empirical data. If there is a specific statement with which you take exception, please provide the Page and Line numbers from the mark-up version of the proposed MUTCD text.* |
| ALL | YES |  |  | I agree and support the overall NPA and efforts by the FHWA to update the Manual on Uniform Traffic Control Devices (MUTCD) as soon as possible.  I request the FHWA incorporate all NCUTCD docket comments into the final rule—with a few minor exceptions noted below. |
| 2D.01 | YES | N/A | N/A | NPA page 138 of 697, lines 33-50 and page 139 of 697, lines 1-5.  Agree with the new MUTCD content specific to airport signing.  However, this content appears to be out of place given Section 2D.01 is specific to ‘Conventional Roads’ and ‘General Design’ principles. Since airport signing is a specific application, placement of this content, as shown in the NPA, is very subtle and not called out, making it difficult for practitioners to find.  Recommend:   * This content be repositioned to follow NPA Section 2D.55 since signing for airports and community wayfinding share similar guide sign principles, and * This content has a unique Section number so it will be easier to practitioners to find. |
| 2D.07 | YES | YES | N/A | NPA page 141, line 36, Table 2D-3.  Agree with abbreviations used in Table 2D-3.  Do not concur with NCUTCD recommendation to add “CR” as an abbreviation for “Crossing” in Table 2D-3 since a “CR” abbreviation:   * Would be inconsistent with both the existing “XING” abbreviation used in other parts of the MUTCD and is also a standard USPS abbreviation. * In addition, “CR” may be confused by the public with other meanings such as “Creek” or “County Road.” |
| 2E.07 | YES | YES | N/A | NPA page 182, lines 24 and 26.  Agree with the text in the NPA.  Do not concur with NCUTCD recommendation to revise NPA text in this paragraph. |
| 2H.01 | YES | N/A | N/A | Figure 2H-1, I3-9 symbol sign.  Agree with the concept of General Symbol Signs.  NPA includes the Vehicle Ferry Terminal symbol sign (I3-9) from the 2009 MUTCD. While this symbol sign is appropriate for its intended purpose, the NPA does not offer a companion symbol sign for a “passenger-only” (or “urban ferryboat” or “walk-on”) ferry terminal, that is, where ferry vessels do not transport vehicles such as passenger cars, trucks, or buses.  The I3-9 symbol sign is based on the May 2008 FHWA Pooled Fund Study (PFS) ‘Symbol Sign Study.’ This research was in response to a private car ferry operator providing service between Rochester, NY and Toronto, ON. Although this private car ferry service was short-lived and ceased operation, the symbol sign remains.  Unfortunately, the PFS study focused solely on vehicle ferries and didn’t consider passenger-only ferries. It’s important to note many metropolitan areas provide passenger-only ferry services such as those in the Seattle, San Francisco, Long Beach, San Diego, Portland ME, Boston, New York, and Tampa metropolitan areas. Several metropolitan areas exclusively provide passenger-only ferries.  Although the MUTCD provides symbol signs that differentiate between a “light rail station” (symbol I3-1) and a “train station” (symbol I3-7), it’s not necessarily clear why this distinction is relevant or warranted to an unfamiliar motorist destined to a rail or train station.  On the contrary, the distinction between a “vehicle” vs. a “passenger-only” ferry terminal is significantly relevant information for an unfamiliar motorist.  While a recent PFS considered a new symbol for passenger-only ferry terminals, the NPA has not adopted such a symbol.  Given the existing I3-9 symbol sign is not appropriate for passenger-only ferry terminals, request the MUTCD provide a new symbol sign for passenger-only ferry terminals. |
| 3E.04 | YES | YES | N/A | Figure 3E-5, Diagram B.  Agree with the concept that the MUTCD include a new Section dedicated to pavement markings for part-time travel on shoulders.  However, Diagram B shows both an HOV diamond symbol and BUS ONLY pavement markings in the same right-hand traffic lane. This pavement marking is inconsistent with:   * Sec 2G.10, Para 09 which states “The diamond symbol shall not be used with preferential lanes for other types of traffic, such as bus lanes or taxi lanes” and * Figure 2G.1 which distinguishes regulatory signs for HOV lanes (with a diamond symbol) from BUS ONLY lanes (without a diamond symbol).   Request Figure 3E-5, Diagram B delete the BUS ONLY word message and retain the HOV diamond symbol. |
| 8D.04 | NO | YES | N/A | Page 639 (clean version), Lines 4 – 8.  Agree with the concept that the MUTCD include a new Section dedicated to Active Traffic Control Systems for LRT Grade Crossings.  However, suggest the following edits to remove ambiguity between “speeds,” “operating speeds,” and improve overall clarity:  Standard:  At highway-LRT grade crossings where LRT operating speeds exceed 25 mph, active devices shall be used.  At highway-LRT grade crossings where LRT operating speeds exceed 40 mph, ~~active traffic control systems (see Section 8D.01), including~~ automatic gates~~,~~ shall be used.  ~~At highway-LRT grade crossings where LRT operating speeds exceed 25 mph, active traffic control systems shall be used.~~ |
| 9B.12 | YES | N/A | N/A | Figure 9B-4, Diagram B ‘Midblock Transit Stop.’  Agree with establishing a Bicycles Yield To Peds Sign (R9-6) but do not agree with the application shown for a Midblock Transit Stop (Diagram B).  Diagram B should be deleted given:   * Curb ramp assumes a wheelchair lift on the transit vehicle will be deployed onto the street surface * Boarding and alighting a wheelchair is easier, requires less maneuvering, and is preferred by wheelchair users from the sidewalk vs. the street surface * Transit operators prefer to engage a wheelchair lift onto the sidewalk. A 6-inch raised sidewalk is more efficient, faster, safer and provides a stable surface to engage a lift from a transit vehicle * Crown of the road may not allow compliance with ADA requirements for a flush boarding and alighting area. Diagram B may mislead practitioners to suggest deploying a wheelchair lift on the street surface is appropriate * ADA requires a 5ft wide by 8ft deep wheelchair boarding and alighting area for each transit stop. These dimensions are not shown in Diagram B. * The wheelchair lift may be positioned in several locations on any given transit vehicle (e.g., front door, behind the front axle, middle door, rear door, behind rear axle). Consequently, the location of the ADA required 5ft wide by 8ft deep boarding and alighting area can vary significantly for a transit stop, particularly if served by more than one transit operator. * Figure B does not show dimensions between the street surface wheelchair boarding and alighting area (required by ADA), the bicycle buffer and the green bicycle lane * The bike lane should have a dotted pattern to alert cyclists that a transit vehicle may occupy the same street space as the bike path. This pattern is consistent with other figures in the NPA (e.g., Figure 9E-3, Figure 9E-4, and Figure 9E-6) |