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.* |
| Part 4 |  |  |  | UDOT supports the proposed amendments to Part 4, with some exceptions noted below. |
| 4A.10 | No | Yes | N/A | Redline page 407, Lines 33-36: Need to fix wording here. Currently reads "Prior to installing any highway traffic signal, the responsibility for the maintenance of the signal and all of the appurtenances, hardware, software, and the timing plan(s) should be clearly established by the responsible" Should this read “responsible agency”? |
| 4B.02 | No | No | Yes | Page 409, Line 39: UDOT is concerned about suggesting that phasing, operation, and timing of traffic control signals should be based on an engineering study. An engineering study requires documentation of why things occurred. Engineering judgement does not require documentation. This could lead to additional liability for agencies managing signals. Engineering studies are necessary for installation of signals, but the phasing, operation and timing may be set using engineering judgment.  We are concerned about a trend in the manual where correct results are non-compliant because they were the result of incorrect processes. We believe that the goals of safety and efficient operations are better achieved by focusing on correct results  We recommend deleting lines 39&40. |
| 4B.02 | No | No | Yes | Redline edition page 409, lines 41-43. We agree that Traffic Signals should not be installed to control speeds, but including operations in this is counterproductive. We suggest deleting page 409 lines 41-43 or at a minimum to reword this to say, "Traffic control signals should not be installed for the purpose of penalizing drivers who are speeding nor should be operated in conjunction with signs that have a legend that informs drivers that speeding triggers a red light."  The reason for the change is that traffic signal offsets are sometimes set for the posted speed limit and not the average or 85th percentile speed.  Example: imagine a situation on a perfect progression corridor, such as a one-way road with a small cycle length where the difference in the posted speed and average speed between drivers is high (20 mph). Assume that the corridor is also an "active transportation" corridor with lots of cyclists, scooters & pedestrians, so it is desired by engineering judgement to keep the posted speed low, despite what the average or 85th percentile speed is doing. Do you set the coordination offsets for 20 mph over the speed limit or for the speed limit? The NPA language defaults to setting the offsets for 20 mph over the speed limit. This leads to safety issues for lower speed road users (e.g. bikes, peds, scooters) and rewards high speed drivers for breaking the speed limit. This is counter to the purpose of traffic control devices as discussed in section 1A.01 (e.g. ...to promote highway safety and efficiency by providing for the orderly movement of all road users..."). |
| Old 4B.05 | No | No | Yes | Redline page 411, line 24. This section was deleted based on reasoning that "content is not specific to traffic control devices." However some of the guidance in this section was useful, including specifically the recommendation that the tradeoff between additional capacity offered by a widened road be weighed against the additional delay caused by having pedestrians cross a wider roadway. |
| 4C.01 | Yes | N/A | N/A | Redlined version page 412, line 25: The word "respectively" is not needed anymore since there is only one condition now. |
| 4C.03 | Yes | N/A | N/A | Redlined version page 415, line 47: Typo. "Figure 4C-1. arrant 2" should read 'Warrant 2' |
| 4D.01 | Yes | No | N/A | Redlined page 422, lines 14-15. Definition of "traffic" on page 30 lines 1-3 is very broad. UDOT agrees with and supports the concept that a traffic signal should consider various modes of traffic, but we’re concerned that lawyers may use this against us. They may have a different interpretation on what it means to "consider." We certainly would not design all of our signals to be used for herded animals, for example (although it may be appropriate some places!). This statement in 4D.01 should either be guidance, or should be accompanied by some guidance that places practical limits on what level of consideration and accommodation are necessary to say that you've met the requirement of considering all modes.  We are concerned about a trend in the manual where correct results are non-compliant because they were the result of incorrect processes. We believe that the goals of safety and efficient operations are better achieved by focusing on correct results. |
| 4D.08 | Yes | No | N/A | Redlined page 428, lines 41-19, page 419 lines 1-4: The proposed changes make the clearances for vertically- and horizontally-arranged signal heads the same; thus there is no longer any need to have separate sections for the two different arrangements. |
| 4F.01 | Yes | N/A | N/A | Redlined page 437, lines 3-6: UDOT likes this change. It will provide us a way to have a signalized right turn movement (e.g., to protect a heavy pedestrian movement) without being forced to eliminate RTOR or use a blankout sign. |
| 4F.01 | N/A | N/A | N/A | Note – this is not a response to a change proposal in the NPA. UDOT has occasionally timed our Flashing Yellow Arrow termination such that the flashing yellow arrow continues to flash for a short period after the opposing through turns yellow – this increases the time the left-turning driver has to determine if opposing traffic is stopping prior to the red left arrow. A strict reading of the requirements of redlined page 437 line 7, 35-9, prohibits us from using the "FYA delay" we sometimes use for added intersection safety during the change interval. Line 38 should be changed to "A steady CIRCULAR YELLOW or steady CIRCULAR RED signal indication is also..."  See also page 440 line 16.  We believe UDOT’s use of the “FYA delay” is consistent with the intent of the manual. The intent of the manual is to avoid the yellow trap, and allowing the FYA and solid yellow phases to lag the opposing does not create a yellow trap. |
| 4F.04 | No | Yes | N/A | Redline page 442, lines 26-30: Prior to this version of the MUTCD it was not permitted to use the same yellow arrow to display both the flashing arrow and steady arrow displays. UDOT agrees with the change to permit the 3-section head. This paragraph basically says now "thou shalt not do this unless you do." The whole paragraph is now unnecessary and can be deleted. |
| 4F.05 | No | Yes | N/A | Redline version, Page 444, line 5: The comma is not needed between "displaying" and "the following" |
| 4F.08 | No | Yes | N/A | Page 445 lines 32-37: UDOT agrees with this operation in general but we want to point out that controllers don't always function this way, for example when entering preemption. There is no safety concern with displaying a yellow change interval in between permissive and protected mode and it shouldn't be prohibited; this Item G should be guidance only. |
| 4F.09 | Yes | No | N/A | Redline page 447 lines 43-44: UDOT agrees with this change, without which we are violating MUTCD at all of our 5-section RT overlap sites whenever the cross-street lefts lead. The similar requirement that exists for left turn phases should be removed or at least softened, too, because there is no reason it can't be safely done (although it is inefficient and potentially confusing). |
| 4F.09 | No | Yes | N/A | Redline Page 447 lines 51-52: Yellow arrows (flashing and steady) are an acceptable display for permissive right turns in FYA and FRA configurations. This paragraph must be changed to read "The right-turn GREEN ARROW signal indication shall not be displayed when operating in the permissive only mode." |
| 4F.10 | No | Yes | N/A | Redline Page 448 lines 49-50: Yellow arrows (flashing and steady) are an acceptable display for permissive right turns in FYA and FRA configurations. This paragraph must be changed to read "The right-turn GREEN ARROW signal indication shall not be displayed when operating in the permissive only mode." |
| 4F.11 | No | Yes | N/A | Redline page 449, line 37-41: Prior to this version of the MUTCD it was not permitted to use the same yellow arrow to display both the flashing arrow and steady arrow displays. UDOT agrees with the change to permit the 3-section head. This paragraph basically says now "thou shalt not do this unless you do." The whole paragraph is now unnecessary and can be deleted. |
| 4F.11 | N/A | N/A | N/A | Non-NPA related comment on Redline page 450, line 16: Instead of "steady right-turn RED ARROW" we think this is supposed to say "flashing right-turn RED ARROW." This section is about FRA displays and otherwise there is no mention in this option of any place to put the FRA. |
| 4F.15 | No | Yes | N/A | Redline page 453, Lines 25-29: UDOT agrees with this addition, but there should be an exception (as in other Sections of the MUTCD) where the right and left turns have separate departure lanes and pavement markings/channelization that prevent a conflict. |
| 4F.15 | No | No | Yes | Redline page 453 line 30-36: Controllers don't natively support this, yet; it has required significant custom logic to operate this way and there should be no safety reason why a yellow change couldn't be provided in between. |
| 4F.16 | No | Yes | N/A | General comment about this section: On an approach that has no thru movement and that doesn't have a combined left/right turn lane, and that doesn't oppose a one-way roadway or have high speed, it may be advantageous to have the option to use CIRCULAR indications to avoid pedestrian conflicts or the need for an exclusive pedestrian phase. The situation of a T-intersection with separate left and right turn lanes is common but is not addressed very well in the MUTCD. The new paragraph in lines 44-48 of page 455 may be allowing this use but it isn't clear. |
| 4F.17 | No | No | Yes | Redline page 457, lines 37-39: This ITE Recommended Practice is bad guidance and shouldn't be included, even by reference, in the MUTCD which is legally binding. If it is included, it should be clearly stated in the MUTCD that the method(s) it describes are only one of many methods that could be appropriate and that there is no requirement, legal or otherwise, to use them. |
| 4F.17 | No | No | Yes | Redline page 458 lines 9-10: The guidance that longer yellows should be reserved for situations with higher speeds should not be removed here. It remains unchanged in several other Chapters (e.g., on HAWKs, emergency vehicle beacons, etc). Those other chapters should not have different guidance than here. |
| 4G.01 | N/A | N/A | N/A | Non NPA related comment: Redline page 461, line 14: This is phrased poorly (and has been since the 2000 MUTCD). Should be changed to read "The flashing operation shall not be terminated by removing or turning off the controller unit..." |
| 4G.01 | No | No | Yes | Redline page 461 lines 17-18: We can't think of a situation where a conflict monitor/MMU would NOT be appropriate. The authors are trying to shorten this paragraph but it needs to be clear that CM/MMU is not optional. This change is not needed and should not be made; the prior wording should be left in place. |
| 4H.01 | No | No | Yes | Redline page 464 lines 17-18: UDOT agrees that consistency will be important. We are concerned however, that someone could interpret this statement, combined with our decision to install a bicycle face for a particular need (e.g., at a SPUI) as meaning that we have taken a systematic approach committing ourselves to installing bicycle signal faces everywhere. We recommend removing this statement to prevent liability from considered choices |
| 4H.12 | No | No | Yes | Redline page 468, lines 7-8: No other statement in the MUTCD for any other type of vehicle provides a SHALL statement on a minimum duration of yellow change. This paragraph should delete the "except that..." clause. The support statement is helpful but doesn't address this specific concern. Also, as noted above, UDOT does not agree with the use of the ITE Recommended Practice referenced in 4F.17. |
| 4I.04 | N/A | N/A | N/A | Non NPA concern: Redline page 471, line 19: Why 4 seconds? The buffer required is 3 seconds; this guidance should match. |
| 4I.05 | N/A | N/A | N/A | Non NPA concern: Redline page 473 lines 10-12: This requires a lot of extra expensive, unreliable technology. A simple pushbutton flash to indicate that the button has been pushed provides much of the benefit at a fraction of the cost and complexity. |
| 4J.02 | No | No | Yes | Redline Page 477 line 36: We should use the same consideration for APS with PHBs as we would a traffic signal. We recommend deleting these lines as they’re unnecessary. |
| 4J.03 | Yes | N/A | N/A | Page 478 lines 44-50: Two points   1. UDOT does not agree with the changes to yellow clearance intervals in 4F.17, the language in 4F.17 should note be changed, and; 2. The language here should reference 4F.17 without repeating guidance or offering guidance that conflicts with 4F.17. |
| 4K.01 | No | Yes | N/A | Redline Page 480, lines 12 and 14: Changing visual to vision is not needed – and inconsistent with elsewhere in the manual where vision is used. |
| 4K.02 | No | No | Yes | Redline Page 482, lines 45-46: The line to be deleted, "Speech messages might be either directly audible or transmitted, requiring a personal receive to hear the message". We recommend leaving this line in the text as we are currently researching a pedestrian app that talks to our traffic signals and provides pedestrians safety and other messages, including pedestrian phasing. |
| 4K.04 | No | Yes | N/A | Redline page 484, Line 19: Should read "Paragraph 5, push button locator tones shall repeat..." |
| 4K.05 | N/A | N/A | N/A | Non-NPA recommendation: Redline page 485, line 1: The sign and the timing requirement should match. A one-second push is not very long. It should match the sign which says 2-seconds. |
| 4N.03 |  |  |  | Page 493 lines 21-27: Two points   1. UDOT does not agree with the changes to yellow clearance intervals in 4F.17, the language in 4F.17 should note be changed, and; 2. The language here should reference 4F.17 without repeating guidance or offering guidance that conflicts with 4F.17. |
| 4P.02 | No | No | Yes | Redline page 495 lines 38-39: UDOT strongly disagrees with the requirement for two signal heads per lane on one and two lane ramp meters – there is no conflict if a signal head burns out, and it is not required for 3 lane ramp meters. We believe the additional signal heads do not provide additional clarity and increase maintenance issues. Furthermore, LED indications burn out much less than incandescent indications – the need for redundancy is much less than it used to be. |
| 4P.03 | No | No | Yes | Redline page 496, line 35-37: Why are flashing borders not acceptable? They can be useful in areas with limited horizontal or vertical clearance. A blankout sign option might be useful as well. |
| 4Q.02 | No | Yes | N/A | Redline page 498, line 14: Word “mandatory” can be removed since prior paragraph has been changed from standard to guidance |
| 4Q.03 | N/A | N/A | N/A | Redline page 499, lines 25-33: Two points   1. UDOT does not agree with the changes to yellow clearance intervals in 4F.17, the language in 4F.17 should note be changed, and; 2. The language here should reference 4F.17 without repeating guidance or offering guidance that conflicts with 4F.17. |
| 4S.04 | No | No | Yes | Redline page 502, line 28-30: Why are flashing borders not acceptable? They can be useful in areas with limited horizontal or vertical clearance. |
| 4S.03 | No | Yes | N/A | Redline page 503 lines 7-8: UDOT recommends that this be an option rather than guidance. |
| 4S.04 | No | No | Yes | Redline page 504, line 44: Why are flashing borders not acceptable? They can be useful in areas with limited horizontal or vertical clearance. |
| 4T.02 | No | Yes | N/A | Redline page 504, line 44: Suggest rewording to "A steady DOWNWARD GREEN ARROW signal indication shall mean that the lane which the arrow signal indication is located over is open to vehicle travel in the direction viewed by the road user." Otherwise it gives the impression that the direction of the arrow indicates which direction can be traveled. We also feel the change "lane over which the indication is located" to "lane which the indication is located over" isn’t useful. |
| 4T.02 | No | Yes | No | Redline page 505, lines 8-11: The statement that the signal indication "shall modify accordingly the meaning of other traffic controls present" is still needed and shouldn't be removed. For example, if there is a stop line painted in that lane. |
| 4T.03 | N/A | N/A | N/A | Non NPA recommendation: Page 505, lines 26-28, based on UDOT’s experience this requirement resulted in an unsafe situation with a visual overload of too many signals. It should be permitted to use a static sign instead of a lighted signal for these signs. |

**TABLE 2. AGREE WITH ANOTHER COMMENTER.** If you agree with another commenter, please indicate the commenter with whom you agree with and note any additional information FHWA may find helpful or any exceptions.

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| Docket Comment Number and/or Commenter Name | Agree with commenter’s comments as written | Agree with commenter; with exception(s) | Additional information helpful to FHWA, or exceptions to commenter’s comments |
| (**EXAMPLE**)  FHWA-2020-0001-59 | YES | N/A |  |
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