May 14, 2021

Stephanie Pollack Acting Administrator (HOA-1) Federal Highway Administration

1200 New Jersey Avenue, S.E. Washington, DC 20590

Re: Comments on Notice of Proposed Amendment for Proposed 11th Edition of the Manual on Uniform Traffic Control Devices (MUTCD)

Dear Acting Administrator Pollack:

Thank you for the opportunity to comment on the NPA of the MUTCD. I have had the privilege of working with individuals with visual impairments an Orientation ad Mobility Specialist. Should my clients desire to have the equivalent access to the build environment by requesting the installation of an Accessible Pedestrian Signal they must fulfil requirements that would be instantaneously appeared to be overreaching if the equivalent requirements were needed when a sighted pedestrian requested a treatment such as a pedestrian pushbutton. Other components that must be addressed include the following:

* Submitting a request for installation of APS to the city, county, or state traffic engineering department
* An explanation of the routes the client frequents, with the rationalization that only those routes that are used often will have APS installed at those corners.
* Requests to determine how long the client has resided at their present residence, should they relocate to another residence the APS may be removed.
* If they have a need for a caretaker
* If they can locate the vibrotactile arrow on the APS
* If they have been evaluated by an Orientation and Mobility Specialist and determined to have the needed skills to cross the requested signalized intersection

Below is a typical request by a client which is followed up by additional requests for more information. A letter to their Congressional Representative asking if those questions are offensive may be helpful to expedite the status of the request the request forward without the need to answer the questions posed in the additional documentation. One case which occurred over a period of fours encompassed requests, follow up meetings, letters of support from other blind and visually impaired individuals, and reaching out the state Department of Transportation began to see action after a Congressional Inquiry was initiated by their Representative.

My name is Joe Smith, and I am legally blind. I have been working with an Orientation and Mobility Specialist, and she has taught me how to locate the vibro-tactile push button on APS and how to locate the curb to cross the street. I am confident that I could apply these skills to other installations of Accessible Pedestrian Signals.

As a vulnerable road user and forced pedestrian I find that it is presently unsafe for me to cross this street and that street. I am not able to walk from my home nearby to access, retail establishments and other entities that my sighted peers can travel on foot with few challenges or conflicts.

I would like to request that Accessible Pedestrian Signals (APS) be installed at all four segments of this intersection. It is my understanding that the county traffic engineering department has a policy of installing APS at only one crosswalk. However, it is my understanding that the State Department of Transportation installs APS at all segments requested by residence of my state.

I am perplexed by the county policy. Please understand that I cannot choose which segment of the intersection I would like to be accessible just as my sighted peers do not have to decide which crosswalk is safer and which one is too hazardous to attempt to cross. If my sighted peers do not have to address limitations in their ability to walk around their built environments, then I shouldn’t have to address these challenges either. I am a taxpaying, productive member of my city; I should be able to have equal access to all parts of this intersection, it’s my Civil Right.

For these reasons, I am requesting that an Accessible Pedestrian Signals (APS) be installed at all segments of this street and that street.

In the future after this pandemic has subsided and we have flattened the curve, I will gladly meet with you at the intersection in question to discuss appropriate modifications.

Thank you for your continued cooperation making this county accessible to all its taxpaying citizens.

Sincerely,

Joe Smith

In response to this client’s request, the county sent him a follow-up document which are outlined in the correspondence to a State Representative.

Dear Representative:

I am a resident of this state who is legally blind. I submitted a letter to the county and state department of transportation requesting installation of an Accessible Pedestrian Signal at this street and that street, which is part of the Manual on Uniform Traffic Control and Devices (Section 4E.09-4E.13).

In response to my request, this county sent me FORM AS2019 V1 to complete. I am being asked to provide information on my destinations and routes, requested intersections and directions, instructional dates and person providing assistance to requestor.

Even though, I am legally blind I am independent and do not need a caretaker. I am offended that it is assumed that I require assistance.

I am perplexed as to why I need to reiterate most of the information provided in the original letter.

I would appreciate your assistance seeking clarification on the rationale for the invasive inquiry.

Thank you in advance,

Joe Smith

The installation of Accessible Pedestrian Signals should coincide with other treatments that are automatically considered at crosswalks. Equivalent accessibility to the built environment. APS should be installed whenever and wherever signalized intersections are present. I would like to quote from my esteemed colleague, Dr. Eugene Bourquin, and his comment**…**only APS can convey the signal information needed by people who are blind to make safe decisions. The MUTCD ought to require Accessible Pedestrian Signals at crosswalks…

I hope that the FHWA considers this robust suggestion and recommendation with the intention of creating an accessible, vibrant, and inclusive built environment.

Thank you for your time and consideration.

Sincerely,

JoAnne Chalom, COMS, Ed.S.

Certified Orientation and Mobility Specialist