In re Docket FHWA-202-0001

As a driver of motor vehicles for over six decades I am pleased to be able to input my concerns in regard to The Federal Highway Administration’s proposed changes to the Manual on Uniform Traffic Control Devices.

My comments pertain to section 2B.21, Speed Limit Signs and Plaques (Section 2B.13 in the 2009 edition) which proscribes that statutory speed limits be based on a currently performed engineering study – one relying on recognized traffic engineering practices which include without exception an analysis of the present day speeds of the flow of traffic on the road or highway under consideration.

The accepted criterion for establishing a proper speed limit for a particular roadway is to ascertain and then apply the speed at which 85 percent of the vehicles are in fact traveling. In this way, the appropriate limit can conform to the speed traveled by the majority of the drivers whose everyday perception of the safety and appropriateness of a given speed on a given road is, and certainly would appear to be, more relevant than a limit set without regard real world practice. There may be “hot shots” and those who for good reason drive more slowly, but in between are found responsible drivers evaluating conditions and behaving accordingly. They are the 85 percent of the motorists. That is the presently accepted engineering standard.

Traffic accidents actually tend to occur more frequently when speed limits are set too low because then a dangerous variance will come to exist between those who have found a speed that they can safely travel and those who adhere to the unrealistically low limit out of fear of being ticketed. The result is too often a driver’s confusion in constantly having to appraise the speed of vehicles traveling ahead or behind.

This belies the contention that simply reducing speed limits will create safer driving. Records show that in most cases an increase of a lower speed limit to the 85th percentile does not only not increase accidents, it generally reduces them.

For these reasons I respectfully submit that whatever other aspects of the MUTCD may be appropriate, the guiding principal of the 85th percentile standard must be preserved.

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