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.* |
| General |  |  |  | These comments are submitted by Moeurgineering, PLLC, an Arizona corporation, and represent the positions, viewpoints, and professional opinions of Moeurgineering PLLC and its chief engineer, Richard C. Moeur, PE. |
| General |  |  |  | **These comments do not represent the position or opinions of any group, organization, corporation, or agency with which Mr. Moeur or Moeurgineering has or has had a personal, professional, employment, contractual, or business relationship. To be specific, these comments do not represent the position or opinions of NCUTCD, Bentley Systems, ADOT, AASHTO, LAB, ACA, ATSSA, TRB, ITE, PMBC, or other organizations, agencies, or groups.** |
| General |  |  |  | Moeurgineering expresses the strongest support for completing the current rulemaking process and publishing the 11th Edition as soon as reasonably practicable. This nation has been waiting over 11 years for a new edition of the MUTCD, and we hope FHWA will move with all deliberate speed to publish this new edition. |
| General |  |  |  | Some of these comments differ from and in some cases disagree with or contradict comments submitted by other persons, agencies, or organizations. In those cases, Moeurgineering is clear that although there is a difference in professional opinion on that particular item, this does not reflect on other contributions by any other party or imply a lack of respect for the effort and deliberation behind their comments. |
| 1B.02 | NO | NO | YES | Moeurgineering notes a new Standard statement added to Section 1B.02 defining all policies, directives, specifications, standard drawings, or similar documents relating to traffic control devices as being considered “MUTCD supplements” requiring FHWA approval per 23 CFR 655.603. While rewriting these documents to meet FHWA expectations could be a lucrative source of income for a consulting firm such as Moeurgineering, a better approach would be to delete this Standard paragraph, reduce the workload on agencies and FHWA, and trust agencies and practitioners to do the best job in developing these references to serve practitioners and the public without onerous oversight, similar to how other functions have been devolved to local and state agencies. |
| 2C.40 | NO | YES | N/A | Moeurgineering recommends adding a SPEED REDUCED AHEAD sign to the W3-5 series. This sign has a clear, simple message similar to the old R2-5a, and can be used for a wide variety of speed transitions, which could greatly reduce the need for agencies to fabricate and stock W3-5 signs for different speeds, especially for temporary traffic control. This sign has been successfully used in Arizona for nearly 20 years. |
| 2C.44 | NO | NO | YES | The traffic signal practice commonly known as “yellow trap” is a very serious safety concern, and can result in severe or fatal crashes. The W25 series of signs were added to the MUTCD to attempt to address this issue. However, there seems to be little evidence these signs are effective in influencing driver left turn behavior. In recent years other engineering tools such as flashing yellow arrow and split phasing have been added to the MUTCD. Moeurgineering recommends that FHWA consider a plan to phase out “yellow trap” signal conditions and W25 signs, possibly with a 10-15 year compliance date in order to reduce the burden on affected agencies. |
| Table 2D-1 | NO | YES | N/A | Moeurgineering recommends reassigning Table 2D-1 from Standard to Guidance, in much the same way that other authoritative tables in Part 2 are at Guidance level. This will establish uniform recommended minimum sizes for these signs, but allow variances where physical and other constraints do not practically accommodate the use of recommended sizes. |
| 2D.05 | NO | NO | YES | Current electronic sign design practice uses only the upper case letter height to correctly select the letter size for all text, similar to nearly all other software. Some sign designers seem to think that upper & lower case letter heights are handled identically to the practice for cardinal directions of specifying shorter upper case letter heights for letters following the initial letter. This then creates a sign with lower case legend that is too small, which greatly reduces legibility and no longer meets MUTCD Standards.  Examples from across the US of misformatted signs due to confusion on lower case letter height:    **Moeurgineering strongly recommends revising Section 2D.05 by removing any and all references to the obsolete practice of referring to lower-case letter loop height and instead refer solely to upper case or mixed case letter height.** |
| Table 2D-2 | NO | NO | YES | See comments on Section 2D.05 regarding lower case text. |
| Table 2D-5 | NO | NO | YES | See comments on Section 2D.05 regarding lower case text. |
| 2D.58 | NO | NO | YES | Moeurgineering does not agree with the Standard statement in 2D.58 that reads “Scenic byway, historic trail and auto tours route signs shall not incorporate standard highway sign legend elements into their design.” This would result in the prohibition and elimination of nearly all historic US or state highway route markers used in many states, even though these markers have been used successfully for decades to provide guidance to travelers and have arguably resulted in many millions of dollars of tourist revenue along these signed corridors. These function identically to standard route markers, and should not be arbitrarily prohibited.  An example:    Moeurgineering strongly recommends deleting this Standard paragraph and allowing the continued use of these signs. |
| 2E.12 | NO | NO | YES | Moeurgineering recommends modifying Section 2E.12 to allow the use of appropriate alphabets other than Series E Modified on freeway and expressway guide signs. For example, Series E offers excellent legibility and avoids halation issues at night, and is arguably superior to Series E Modified when used on modern high-performance sign sheetings. Series D can be very useful where lateral space is constrained, such as for a longer destination message on an overhead sign over a single lane. |
| 2E.12 | NO | NO | YES | See comments on Section 2D.05 regarding lower case text. |
| Table 2E-1 to 2E-5 | NO | YES | N/A | Moeurgineering recommends reassigning Table 2E-1 through 2E-5 from Standard to Guidance, in much the same way that other authoritative tables in Part 2 are at Guidance level. This will establish uniform recommended minimum sizes for these signs and related legend elements, but allow variances where physical and other constraints do not practically accommodate the use of recommended sizes. |
| Tables 2E-2 to 2E-5 | NO | NO | YES | See comments on Section 2D.05 regarding lower case text. |
| Table 2E-5 | NO | NO | YES | Moeurgineering recommends either reducing the minimum heights of arrows used on arrow-per-lane signs, or deleting these heights entirely until current ongoing pooled fund research on the topic is complete and reviewed. Arrow-per-lane signs are already very large, and require special sign support structures. Signs that are unnecessarily large can imposes severe impacts on agencies for what could be only marginal effects on legibility. |
| 2E.18 | NO | NO | YES | Moeurgineering strongly disagrees with the Standard paragraph requiring directional arrows on post-mounted exit direction signs  to be located at the bottom portion of the sign and centered under the legend. This is not consistent with decades of sign design practice and many examples depicted in Chapter 2E itself. As seen on arrows on direction signs on conventional roads, placing the arrow on the side where the arrow points is simply good human factors practice. This will also result in unnecessarily taller panels, which will require larger, more expensive, and possibly less crashworthy posts or supports. Deleting this paragraph and continuing the accepted practice of arrows either at the side or bottom based on engineering judgment is best. |
| 9D.04 | NO | NO | YES | Moeurgineering staff have decades of experience with numbered bicycle route systems, including chairing a national-level task force on numbered routes for over a decade and a key role in the redesign of the M1-9 marker. We recognize the value of route signing in providing traveler guidance, but also recognize the limitations of agencies and organizations in their ability to provide guide signing for numbered routes.  Moeurgineering does not agree with the Standard statement requiring all numbered routes to be signed, as even if well-intentioned it seems to be a case of “perfect as the enemy of good”. If implemented, this will likely have a net negative effect, where some agencies will cease development on numbered route systems or even abandon existing designated routes since they don’t have the resources to provide and maintain a full set of signs. This would stymie efforts to create connected route networks at the local, regional, and national level. Delete this Standard. |
| 9E.14 | NO | NO | YES | Moeurgineering agrees with adding bicycle route pavement markings to the MUTCD, recognizing their value (see 9D.04 above). However, Moeurgineering does not agree with the Standard statements limiting these markings to shared-use paths or separated bicycle lanes, and prohibiting them on standard bicycle lanes, buffer-separated bicycle lanes, or in shared lanes. We understand there may be concerns regarding other road users reacting inappropriately to these markings, but a body of experience indicates that drivers ignore markings they perceive as being irrelevant to their task. Restricting these markings in this manner prevents their use in creating a consistent network of bicyclist guidance on a full range of facilities. Delete this Standard.  Moeurgineering also does not agree with prohibiting elongation of bicycle route markings, as bicyclists also scan down the road or other facility at a shallow angle similar to motorists, and elongated markings can assist in correcting for legibility. A review of the 2004 Standard Highway Signs and Markings document reveals that nearly all bicyclist markings are indeed elongate, and several figures in Part 9 in the NPA display elongated markings. Delete this Standard. |
| Appendix A1 | NO | NO | YES | Moeurgineering staff have extensive experience (both good and not-as-good) in using Clearview in accordance with Interim Approval IA-5. Moeurgineering does not endorse the use of Clearview, but does not object to its use by agencies to see value in it. Moeurgineering strongly disagrees with renaming Clearview as “Series E(modified)-Alternate”, as this term will very likely result in confusion by practitioners, decisionmakers, and others as to what is meant by that term. First, this term would seem only to encompass the 5-W character set and 5-W or 5-W-R spacing tables, and leaves out the full range of 1W-6W alphabets useful for a variety of conditions. Also, E(M) and 5-W are notably different typefaces and have notably different characteristics in practical use. Although FHWA should be commended for trying to move this issue forward, Moeurgineering recommends any action to incorporate Clearview should be consistent with the following guidelines:   * Use the common term “Clearview”, as it is best understood by practitioners and the public * Incorporate the full range of 1W-6W positive contrast alphabets * Allow its use for all positive-contrast messages on guide 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 |
| General Note |  |  | Agreement with other organizations does not constitute representation of those organizations. |
| FHWA-2020-0001-0275 | YES | N/A | Moeurgineering agrees with the content and intent of the joint NCUTCD / AASHTO / ITE letter calling for FHWA to proceed to a Final Rule and 11th Edition as fast as practicable. |
| FHWA-2020-0001-2638 | YES | N/A | Moeurgineering agrees with NCUTCD’s comments on Chapter 1A. |
| (tracking number ko1-mft3-rseb) | YES | N/A | Moeurgineering agrees with NCUTCD’s comments on Chapter 1B. |
| (tracking number koi-mk63-rt8k) | YES | N/A | Moeurgineering agrees with NCUTCD’s comments on Chapter 1C. |
| FHWA-2020-0001-2639 | YES | N/A | Moeurgineering agrees with NCUTCD’s comments on Chapter 1D. |
| FHWA-2020-0001-1701 | YES | N/A | Moeurgineering agrees with NCUTCD’s comments on Chapter 2A. |
| FHWA-2020-0001-1558 | YES | N/A | Moeurgineering agrees with NCUTCD’s comments on Chapter 2B, and endorses NCUTCD’s position on speed zoning in Section 2B.21. Mr. Moeur was in the past professionally responsible for statewide speed zoning for a large western US state, and has considerable experience in the topic. Focusing the MUTCD on defining the use of the device and giving agencies and practitioners the latitude to use credible traffic engineering references for setting speed zones seems to be the best balance on this important and politically-charged topic. |
| (tracking number koi-qlon-k3n9) | NO | YES | Moeurgineering generally agrees with NCUTCD’s comments on Chapter 2C, with exceptions noted in Table 1. |
| (tracking number kol-lft2-goux) | NO | YES | Moeurgineering generally agrees with NCUTCD’s comments on Chapter 2D, with exceptions noted in Table 1. Moeurgineering especially endorses NCUTCD’s position on deleting lower case letter height references in 2D.05 and Table 2D-2. |
| (tracking number koo-cfof-n8s1) | NO | YES | Moeurgineering generally agrees with NCUTCD’s comments on Chapter 2E, with exceptions noted in Table 1. |
| (tracking number koo-cktc-z64p) | YES | N/A | Moeurgineering agrees with NCUTCD’s comments on Chapter 2F. |
| (tracking number koo-cr37-o2bk) | YES | N/A | Moeurgineering agrees with NCUTCD’s comments on Chapter 2G. |
| FHWA-2020-0001-1744 | YES | N/A | Moeurgineering agrees with NCUTCD’s comments on Chapter 2H. |
| FHWA-2020-0001-2458 | YES | N/A | Moeurgineering agrees with NCUTCD’s comments on Chapter 2I. |
| FHWA-2020-0001-1745 | YES | N/A | Moeurgineering agrees with NCUTCD’s comments on Chapter 2J. |
| FHWA-2020-0001-1746 | YES | N/A | Moeurgineering agrees with NCUTCD’s comments on Chapter 2K. |
| FHWA-2020-0001-2492 | YES | N/A | Moeurgineering agrees with NCUTCD’s comments on Chapter 2L. |
| (tracking number kol-vd1i-1bea) | YES | N/A | Moeurgineering agrees with NCUTCD’s comments on Chapter 2M. |
| (tracking number kol-k823-uaek) | YES | N/A | Moeurgineering agrees with NCUTCD’s comments on Chapter 2N. |
| (tracking number koi-mwjq-vg6i) | YES | N/A | Moeurgineering agrees with NCUTCD’s comments on Chapter 3A. |
| (tracking number kok-2swm-8rku) | YES | N/A | Moeurgineering agrees with NCUTCD’s comments on Chapter 3B. |
| (tracking number koi-mznt-bjc1) | YES | N/A | Moeurgineering agrees with NCUTCD’s comments on Chapter 3C. |
| (tracking number koi-n6dv-im0v) | YES | N/A | Moeurgineering agrees with NCUTCD’s comments on Chapter 3D. |
| (tracking number koi-r7bn-hycf) | YES | N/A | Moeurgineering agrees with NCUTCD’s comments on Chapter 3E. |
| (tracking number koi-rlzb-rzjq) | YES | N/A | Moeurgineering agrees with NCUTCD’s comments on Chapter 3F. |
| (tracking number koi-t0cu-0q7h) | YES | N/A | Moeurgineering agrees with NCUTCD’s comments on Chapter 3G. |
| (tracking number koi-xkmr-s5bj) | YES | N/A | Moeurgineering agrees with NCUTCD’s comments on Chapter 3H. |
| (tracking number koi-vdxl-klp2) | YES | N/A | Moeurgineering agrees with NCUTCD’s comments on Chapter 3I. |
| (tracking number koi-vptt-vvno) | YES | N/A | Moeurgineering agrees with NCUTCD’s comments on Chapter 3J. |
| (tracking number koi-vw67-4186) | YES | N/A | Moeurgineering agrees with NCUTCD’s comments on Chapter 3K. |
| FHWA-2020-0001-2493 | YES | N/A | Moeurgineering agrees with NCUTCD’s comments on Chapter 4A. |
| FHWA-2020-0001-2412 | YES | N/A | Moeurgineering agrees with NCUTCD’s comments on Chapter 4B. |
| FHWA-2020-0001-2413 | YES | N/A | Moeurgineering agrees with NCUTCD’s comments on Chapter 4C. |
| FHWA-2020-0001-2414 | YES | N/A | Moeurgineering agrees with NCUTCD’s comments on Chapter 4D. |
| FHWA-2020-0001-2586 | YES | N/A | Moeurgineering agrees with NCUTCD’s comments on Chapter 4E. |
| (tracking number koi-nepj-rdbj) | YES | N/A | Moeurgineering agrees with NCUTCD’s comments on Chapter 4F. |
| FHWA-2020-0001-2415 | YES | N/A | Moeurgineering agrees with NCUTCD’s comments on Chapter 4G. |
| FHWA-2020-0001-2571 | YES | N/A | Moeurgineering agrees with NCUTCD’s comments on Chapter 4H. |
| FHWA-2020-0001-2416 | YES | N/A | Moeurgineering agrees with NCUTCD’s comments on Chapter 4I. |
| FHWA-2020-0001-2417 | YES | N/A | Moeurgineering agrees with NCUTCD’s comments on Chapter 4J. |
| FHWA-2020-0001-2418 | YES | N/A | Moeurgineering agrees with NCUTCD’s comments on Chapter 4K. |
| FHWA-2020-0001-2419 | YES | N/A | Moeurgineering agrees with NCUTCD’s comments on Chapter 4L. |
| FHWA-2020-0001-2420 | YES | N/A | Moeurgineering agrees with NCUTCD’s comments on Chapter 4M. |
| FHWA-2020-0001-2421 | YES | N/A | Moeurgineering agrees with NCUTCD’s comments on Chapter 4N. |
| FHWA-2020-0001-2422 | YES | N/A | Moeurgineering agrees with NCUTCD’s comments on Chapter 4O. |
| FHWA-2020-0001-2423 | YES | N/A | Moeurgineering agrees with NCUTCD’s comments on Chapter 4P. |
| FHWA-2020-0001-2424 | YES | N/A | Moeurgineering agrees with NCUTCD’s comments on Chapter 4Q. |
| FHWA-2020-0001-2425 | YES | N/A | Moeurgineering agrees with NCUTCD’s comments on Chapter 4R. |
| FHWA-2020-0001-2426 | YES | N/A | Moeurgineering agrees with NCUTCD’s comments on Chapter 4S. |
| FHWA-2020-0001-2427 | YES | N/A | Moeurgineering agrees with NCUTCD’s comments on Chapter 4T. |
| FHWA-2020-0001-2428 | YES | N/A | Moeurgineering agrees with NCUTCD’s comments on Chapter 4U. |
| (tracking number kol-ne3x-bair) | YES | N/A | Moeurgineering agrees with NCUTCD’s comments on Chapter 5A, especially the recommendation that all Part 5 material be at the Support level. |
| (tracking number kol-npef-0juk) | YES | N/A | Moeurgineering agrees with NCUTCD’s comments on Chapter 5B, especially the recommendation that all Part 5 material be at the Support level. |
| (tracking number kol-k2mc-ztli) | YES | N/A | Moeurgineering agrees with NCUTCD’s comments on Chapter 6A. |
| FHWA-2020-0001-2508 | YES | N/A | Moeurgineering agrees with NCUTCD’s comments on Chapter 6B. |
| FHWA-2020-0001-2509 | YES | N/A | Moeurgineering agrees with NCUTCD’s comments on Chapter 6C. |
| FHWA-2020-0001-2495 | YES | N/A | Moeurgineering agrees with NCUTCD’s comments on Chapter 6D. |
| FHWA-2020-0001-2496 | YES | N/A | Moeurgineering agrees with NCUTCD’s comments on Chapter 6E. |
| (tracking number kol-vhxh-0ouv) | YES | N/A | Moeurgineering agrees with NCUTCD’s comments on Chapter 6F. |
| (tracking number kol-vmu9-lxxv) | YES | N/A | Moeurgineering agrees with NCUTCD’s comments on Chapter 6G. |
| (tracking number kol-vpuv-w88h) | YES | N/A | Moeurgineering agrees with NCUTCD’s comments on Chapter 6H. |
| FHWA-2020-0001-2499 | YES | N/A | Moeurgineering agrees with NCUTCD’s comments on Chapter 6I. |
| FHWA-2020-0001-2500 | YES | N/A | Moeurgineering agrees with NCUTCD’s comments on Chapter 6J. |
| (tracking number kol-vt9a-ancm) | YES | N/A | Moeurgineering agrees with NCUTCD’s comments on Chapter 6K. |
| (tracking number kol-vx39-32m2) | YES | N/A | Moeurgineering agrees with NCUTCD’s comments on Chapter 6L. |
| (tracking number kol-w0m7-f89o) | YES | N/A | Moeurgineering agrees with NCUTCD’s comments on Chapter 6M. |
| (tracking number kol-wrcg-0sio) | YES | N/A | Moeurgineering agrees with NCUTCD’s comments on Chapter 6N. |
| FHWA-2020-0001-2501 | YES | N/A | Moeurgineering agrees with NCUTCD’s comments on Chapter 6O. |
| (tracking number koi-xon9-27ts) | YES | N/A | Moeurgineering agrees with NCUTCD’s comments on Chapter 6P. |
| FHWA-2020-0001-2459 | YES | N/A | Moeurgineering agrees with NCUTCD’s comments on Chapter 7A. |
| FHWA-2020-0001-1750 | YES | N/A | Moeurgineering agrees with NCUTCD’s comments on Chapter 7B. |
| FHWA-2020-0001-2461 | YES | N/A | Moeurgineering agrees with NCUTCD’s comments on Chapter 7C. |
| FHWA-2020-0001-1752 | YES | N/A | Moeurgineering agrees with NCUTCD’s comments on Chapter 7D. |
| FHWA-2020-0001-2572 | YES | N/A | Moeurgineering agrees with NCUTCD’s comments on Chapter 8A. |
| FHWA-2020-0001-2573 | YES | N/A | Moeurgineering agrees with NCUTCD’s comments on Chapter 8B. |
| FHWA-2020-0001-2575 | YES | N/A | Moeurgineering agrees with NCUTCD’s comments on Chapter 8C. |
| FHWA-2020-0001-2576 | YES | N/A | Moeurgineering agrees with NCUTCD’s comments on Chapter 8D. |
| FHWA-2020-0001-2577 | YES | N/A | Moeurgineering agrees with NCUTCD’s comments on Chapter 8E. |
| FHWA-2020-0001-2429 | YES | N/A | Moeurgineering agrees with NCUTCD’s comments on Chapter 9A. |
| FHWA-2020-0001-2538 | YES | N/A | Moeurgineering agrees with NCUTCD’s comments on Chapter 9B. |
| FHWA-2020-0001-2516 | YES | N/A | Moeurgineering agrees with NCUTCD’s comments on Chapter 9C. |
| FHWA-2020-0001-2536 | NO | YES | Moeurgineering agrees with NCUTCD’s comments on Chapter 9D, with exceptions noted in Table 1. |
| (tracking number koi-nqcb-9i5c) | NO | YES | Moeurgineering generally agrees with NCUTCD’s comments on Chapter 9E, with exceptions noted in Table 1. |
| (tracking number koi-nt9q-0j8a) | YES | N/A | Moeurgineering agrees with NCUTCD’s comments on Chapter 9F. |
| (tracking number koo-cwzf-097n) | NO | YES | Moeurgineering agrees with NCUTCD’s comments on Appendix A1, with exceptions noted in Table 1. |
| FHWA-2020-0001-1719 | YES | N/A | Moeurgineering agrees with NCUTCD’s comments on Appendix A2. |
| (seemingly-infinite) | NO | NO | Moeurgineering does not agree with the numerous comments calling for stopping work on the NPA or immediately “reframing and rewriting the MUTCD”. FHWA has performed a rather good job overall in issuing Interim Approvals to introduce new devices and treatments. Changes to the MUTCD, even ones that might on their face seem minor, can have very significant, operational, safety, and risk management impacts. The current frustration with the lack of progress on the MUTCD may be due to political considerations, as regulatory activities may be drawn into high-level policy decisions based more on partisan interests than the needs of the American traveling public. The Trump Administration should be commended for moving the 11th Edition forward (although at a pace that resulted in the rulemaking extending beyond his term), and hopefully the Biden/Harris Administration will complete this work. The current process may seem slow and antiquated to activists accustomed to seeing their will expressed quickly. But the current process of thorough and careful analysis, deliberation, consensus-building, and review by experienced subject matter experts from a very wide variety of backgrounds and professional practice results in the best practicable traffic control standards and guidance for all US road users that can be applied for decades to come across the entire nation. Any efforts to shortcut or bypass this process may likely have unforeseen safety and operational consequences that are greater than then well-documented concerns that have been raised, and could result in traffic ‘control’ that is ineffective or even ignored, resulting in an even-worse situation. |