Comments on FHWA Docket No. FHWA–2020–0001

from Dwight Kingsbury, Ph.D.

This proposed amendment is a long awaited, much needed revision. Specific comments:

1. Proposed s. 1C.02, def. 158: "Pedestrian Hybrid Beacon”.   
     
   Existing definition, but internally inconsistent, describing PHB as "used...at an unsignalized location...", even though "Beacon" is defined as "A highway traffic signal..." Change to "...at an otherwise unsignalized location..."
2. S. 1C.02, def. 265: “Traffic Control Device”.  
     
   Revised definition changes the number from singular to plural (“*all* signs, signals, markings…”). This does not make sense. The NPA text contains dozens of instances in which “traffic control device” clearly refers to a single device of some type, not to all TCDs. Presumably the intent was to emphasize that all the listed devices are TCDs. This could be done by using the adjective “any”. Compare definition 275, which defines “Vehicle” in the singular as “*every* device in, upon, or by which…”, rather than as “all devices…”
3. S. 8E.08 P1:“the universal application of…are the uniform active traffic control device for…”   
     
   Awkward subject-predicate number disagreement; “application” is singular, “are” is plural, “device” is singular. Change to “…~~the universal application of~~ horizontally-aligned, alternately-flashing red lights are the uniform active traffic control devices for…”
4. S. 9B.25 P2: “…intended for viewing by both bicycles and other road users…”  
     
   Other road users are humans, whereas bicycles are vehicles that, at least at this time, are incapable of viewing anything. Change to “…intended for viewing by both bicyclists and other road users…”
5. S. 9D.04 P6(?): “All numbered bicycle routes shall be identified by route signs…”  
     
   This might be ideal, but should be restated as Guidance. Nowadays most cyclists with the time and resources to use an (unfamiliar) numbered route for travel could follow it on a smartphone app, and some still use printed maps. Making route signing a requirement could deter some agencies from pursuing development of numbered routes.
6. S. 9D.12 P6 (?): “that would be otherwise display directional navigation to…”  
     
   Ungrammatical. Intended sense presumably something like “that would otherwise display…”
7. S. 9E.11 P1: “Two-stage bicycle turn boxes allow bicycles the opportunity…”  
     
   As vehicles, bicycles do not have opportunities; their operators do. Change to “…allow bicyclists the opportunity…”