Please use this form to provide comments on the Notice of Proposed Amendments for the MUTCD.

**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.

| 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 1 | YES | N/A | N/A | Agree with proposed amendment 1, revisions will make MUTCD easier to use. |
| Part 2 | YES | N/A | N/A | Agree with proposed reorganization to add subchapters – this will make it much easier to find relevant sections quickly. |
| 2A.08 | NO | YES | N/A | Page 47, Lines 35-36 – The provision requiring lower-case loop heights to be 3/4 of the height of the upper-case letter height is frequently misunderstood. I have seen many signs that instead have the *full height* of lower-case letters set at 3/4 height of the initial upper-case letter, as seen in the picture below for the legends “Santa Ana”, “Pacific Coast Hwy”, and “Camino Las Ramblas”.    I propose adding a figure to illustrate how the loop height is measured to reduce this confusion, shown below. |
| 2B.09 | NO | YES | N/A | Page 68, Lines 19-20 – “Through highway” and “main road” are not official terms for functional classifications, suggest using “Principal Arterial” and/or “Minor Arterial” depending on the intent. Items E and G also seem quite similar and could possibly be combined. |
| 2B.21 | YES | N/A | N/A | Page 76, Lines 12-13 – Agree with keeping 85th percentile as a consideration in setting speed limits as proposed, but would support limiting its use to only freeways and expressways as a compromise with NTSB’s recommendation to remove it. |
| 2B.38 | NO | YES | N/A | Page 90, Lines 24-26 – Suggest rewording this paragraph to make clear that it applies when there are two lanes in a single direction, as opposed to a road with two lanes total, with one lane per direction. A possible wording could be “…beginning of a section of roadway with two lanes in one direction and at selected locations along roadways with two lanes in one direction for additional emphasis.” |
| 2B.53 | NO | YES | N/A | Figure 2B-24 – Would like to see more examples use symbols for parking signs, especially those that were removed from the 2009 MUTCD. |
| 2B.60 | NO | YES | N/A | Figure 2B-27 – Sign codes for NO TURN ON RED signs do not match the proposed text. The designations are also changed from the 2009 MUTCD, and will likely lead to errors in sign manufacturing. The stated reason for this change is to “consecutively designate the word only message sign designations”, but they are already consecutively designated as R10-11a and R10-11b, so I propose that they remain unchanged. Also, I ask that FHWA would consider adding symbol versions of the R10-12a, R10-23a, and R10-30 signs similar to the examples in the pictures below. Note that the R10-23a symbol version below is used along with a R10-23 sign and would not be used alone.  R10-12a: R10-23a: R10-30: |
| 2C.06 | NO | YES | N/A | Page 123, Lines 14-15 – The phrase appears to be missing some information, wording may have been intended to be: “when the number of delineators or chevrons that can be installed within the change in horizontal alignment is less than **[#] per** the spacing specified in Sections 2C.08 or 3F.04.” (Bolded terms are missing in the proposed text.) |
| 2C.28 | NO | YES | N/A | Seems like this section should have been relocated as it does not fit with the surrounding sections and is shown in Figure 2C-9, not Figure 2C-8. |
| 2C.45 | NO | YES | N/A | Figure 2C-14 – Suggest that FHWA add an example showing use of the W4-5 sign. |
| Chap. 2D | YES | N/A | N/A | Some proposed figures in this section have differing shades of green, such as Figures 2D-2 and 2D-3. The sign colors used in all of the figures should be uniform. |
| 2D.29 | NO | YES | N/A | Figure 2D-9 – On sheet 3, the upper left diagram shows a Junction Assembly with State Route 4, but the directional signs at the intersection and Confirming Assembly beyond the intersection show U.S. Route 4. On sheet 4, the Confirming assembly after the intersection on the left shows State Route 61, but the other signs show U.S. Route 61. Also, the other road is labelled State Route 65, but all signs show U.S. Route 65. |
| 2D.31 | NO | YES | N/A | Page 170, Lines 19-20 – the end of the sentence does not make sense given the revised text. A possible rewording could be “…provide advance notice so that turning vehicles can select the correct lanes from which to make their turn.” |
| 2D.35 | NO | YES | N/A | Figure 2D-10 – D1-2a sign is missing distances. |
| 2D.37 | NO | YES | N/A | Page 174, Lines 44-46 – Last sentence of paragraph is redundant since information is also provided in paragraph 3 (Page 175, Lines 4-5) |
| 2D.41 | NO | YES | N/A | Figure 2D-14, Sheet 1 – Location for U AND LEFT TURNS signs is not shown on figure. |
| 2D.49 | NO | YES | N/A | Subchapter Name – A name such as “Freeway Interchange Approach Signs”, or “Signing for Conventional Roads at Freeway Interchanges” may be clearer and more accurate than “Freeway Entrance Signs”, which may be confused with the specific D13-3 sign, and its Section 2D.50 which has the same name.  Figure 2D-19 – The I-13/Roxbury/Middletown/KEEP LEFT sign should be vertically positioned between the two signs to the left to indicate that it would replace both of those, same as in the 2009 MUTCD’s version of this figure. |
| 2D-51 | NO | YES | N/A | Figure 2D-24 – Remove text for black-on-white option per proposed Section 2B.67. |
| 2D.58 | NO | YES | N/A | Page 195, Lines 11-14 – This paragraph has two references to Figure 2D-36, but only the first one seems to be represented in the figure. Is a figure missing? |
| 2E.01 | NO | YES | N/A | Consider putting new paragraphs about signing in and around tunnels in a new section. |
| 2E.18 | NO | NO | YES | Page 206, Line 48-Page207, Line 2 – Disagree with requiring directional arrows to be on the bottom for post mounted signs. Suggest requiring arrows to always be on the side consistent with the direction of the exiting movement for uniformity, or continuing to allow different arrow placements to provide flexibility to reduce sign panel size depending on the shape of the sign. |
| 2E.22 | NO | NO | YES | Page 209, Lines 43-35; and Page 210, Lines 18-20 – Disagree with recommending that interchanges within the same mile can have separate numbers to avoid suffix letters. This Standard and Guidance, especially as written, go against providing uniformity in exit numbering as it is up to the agency maintaining the roadway to determine what distance between interchanges constitutes “so closely spaced that it is impracticable to use separate exit numbers.” This could lead to situations where, for example, EXIT 2, EXIT 3, and EXIT 4 are all within one mile of each other, with a subsequent gap of two to three miles between EXIT 4 and EXIT 5. This effectively makes the numbering more like the consecutive exit numbering method, and could be confusing to road users who would expect more uniform spacing of consecutively numbered exits under the reference location sign exit numbering method. |
| 2E.22 | NO | NO | YES | Page 210, Lines 47-48 – Disagree with requiring a specific position for Exit Number plaques for exits to the right. As the vast majority of exits are to the right, motorists expect that an exit will be to the right, unless specifically told otherwise. As such Exit Number requiring plaques to be placed at the extreme right hand side is unnecessary; however, there should be a prohibition on placing them left of center. |
| 2E.22 | NO | YES | N/A | Figure 2E.24 – Interstate 368 should be Interstate 358, as it branches off of Interstate 58.  Figure 2E-6 – Some of the exit numbers for Interstate 407 do not match the interchange numbers and reference location signs (1A, 1B, 4A, 4B). Also, the asterisk should be removed from I-407 since that is not the beginning of the route; it could be moved to the other end if an interchange number were displayed there.  Figure 2E-7 – The insets for the interchanges of Interstate 3 with Interstates 203 and 103 are copied from Figure 2E-6 and need to be revised to match this figure. Also, there is an extra junction symbol and interchange numbers 11 and 15 on Interstate 3 that should not be there.  Figure 2E-8 – The North arrow is not displayed correctly. |
| 2E.34  2E.36 | YES | N/A | N/A | Page 222, Lines 2-9 – Agree with this provision, but it appears to conflict with the proposed provision from Section 2E.22 mandating that “Exit numbers and suffix letters shall only be used to designate individual exit departure points directly from the freeway mainline” (Page 210, Lines 43-44).  Also, a similar conflict exists with Section 2E.36, which allows exits from collector-distributor roadways to be numbered individually. Suggest revising Section 2E.22 to clarify that exits collector-distributor roadways are an exception to this provision and can be individually numbered. |
| 2E.40 | NO | YES | N/A | Figure 2E-37 – The arrows on the Arrow-per-Lane (APL) sign in this figure should curve left for I-295, and point straight up for US 130 per the text from this section (Page 225, Lines 31-34). |
| 2E.41 | NO | YES | N/A | Agree with proposal for deleting diagrammatic signs as these signs are generally less legible than APL signs at a distance and requiring the use of a single type of sign for exits with option lanes increases uniformity. Also, the new proposed partial-width APL signs allow for more flexibility in APL sign design. |
| 2E.47 | NO | NO | YES | Page 232, Lines 1-2 – Suggest changing this Option to a Guidance or Standard that recommends against or prohibits using text identification instead of a route shield as shields are more quickly recognized than text. |
| 2E.48 | NO | YES | N/A | Page 232, Lines 23-25 – Suggest combining these paragraphs into one paragraph to avoid repetition of the section reference. |
| 2E.53 | NO | YES | N/A | Page 235, Line 43 – This Standard states that the second sign shall display “½ MILE” but Figure 2E-61 shows “NEXT RIGHT”.  Figure 2E-61 – White-on-Black option for truck signs is removed per proposed section 2B.67. |
| 2E.57 | YES | N/A | N/A | Agree with adding the option allowing exit numbers at major at-grade intersections between interchanges on expressways as this will help provide more consistency in expressway signing. |
| 2F.12 | NO | YES | N/A | Figures 2F-6, 2F-7, and 2F-8 – These figures need to be revised to reflect changes to the text of this section that now requires the  M4-17 and M4-18 symbols and makes the word messages optional. |
| 2G.02 | YES | N/A | N/A | Consider adding versions of HOV and Bus Lane signs incorporating symbols such as those shown in pictures below:  R3-11a: R3-11b: R3-14b: |
| 2G.12 | NO | YES | N/A | Figure 2G-11 – Entrance gore sign is labelled as E8-1a, but the sign shown is E8-1. |
| 2G.15 | NO | YES | N/A | Figure 2G-17 – Sign at bottom left should display 2 miles to Interstate 10, same as the other sign to the right. |
| 2G.19 | NO | YES | N/A | Figure 2G-20 – The bottom sign is missing its distance message.  Figure 2G-22 – Case 3 sign should not show “½ MILE” legend.  Figures 2G-23 and 2G-24 – Suggest adding a case 3 showing signing when no ETC account is required, like on Figure 2G-22.  Figure 2G-26 – Note 1 is not needed as an ETC pictograph is not shown in this figure. |
| 2H.01 | NO | YES | N/A | Figure 2H-1 – Seems like “Advance Turn and Directional Arrow Auxiliary Signs for use with General Information Plaques” should instead read “Advance Turn and Directional Arrow Auxiliary **Plaques** for use with General Information **Signs**” |
| 2H.06 | NO | NO | YES | The display of elevation on signs identifying summits should be allowed as this information is useful as a reference of the amount of elevation gained and lost along a route, which may help inform road users about an expectation of downhill grades ahead and the extra fuel use and wear on vehicles from climbing in elevation. |
| 2H.11 | NO | NO | YES | Suggest adding some text supporting and/or recommending that reference location markers start at or near zero at the south or west terminus of the route or the state line, since road users may otherwise misinterpret the distance that they need to travel to reach the terminus or state line.  Page 285, Lines 29-30 – This paragraph should be a Standard since proposed text in Section 2E.22 requires exit numbers to correspond with Reference Location signs.  Page 285, Lines 39-40 – Suggest changing this paragraph to a Standard to support uniformity (with “except where specified in this manual” since Spur Interstate Auxiliary Routes use different rules). At the very least this standard should be applied to new routes. |
| 2H.12 | NO | YES | N/A | Page 286, Lines 12-14 – Suggest making the same revisions to this paragraph from the similar paragraph from Section 2H.11: adding “two tenths of a mile, or one-half mile” and deleting “or at some other regular spacing” to maintain consistency. |
| 2H.14 | NO | YES | N/A | Page 290, Line 49 – “Should” is used within a Standard here. |
| 2I.02 | NO | NO | YES | Figure 2I-1 – D9-3a, D9-15, D9-20, D9-20aP, D9-21, and D9-22 signs from the 2009 MUTCD are missing from this figure, are the proposed to be deleted? Suggest at least keeping the D9-3a sign since it is much more widely used than the others.  Also, Advance Turns and Directional Arrows need to be changed from signs to plaques consistent with other chapters. |
| 2I.05 | NO | YES | N/A | Page 298, Lines 29-32 – The signs referred to in these two paragraphs (D9-21 and D9-22) are not shown in proposed Figure 2I-1. |
| 2J.01 | NO | YES | N/A | Page 303, Line 29 – Delete the words “other than pharmacies” since pharmacies are proposed to be removed as a specific service category. |
| 2J.05 | YES | N/A | N/A | This Section would be better placed close to Table 2J-1, combined with another section, or possibly removed in its entirety if determined to be redundant. |
| 2L.01 | YES | N/A | N/A | Agree with discouraging obscure or humorous messages on CMS, these messages may be distracting to drivers. |
| 2L.04 | NO | YES | N/A | Figure 2L-1 – Is green-on-white the correct color message for this sign? A static sign indicating a closure would normally be black-on-orange or black-on-white. Suggest clarification regarding when colors on CMS should differ from those prescribed for static signs if this is the case (other than specifying colored legend on black backgrounds which is already covered). |
| 2M.04 | NO | YES | N/A | Table 2M-1 – Suggest sorting by sign code to match sorting of figures later in the chapter and sign tables in other chapters. Also, signs listed in this table do not all match the signs shown in the figures. |
| 2M.08 | NO | NO | YES | Figures 2M-5 through 2M-10 – Many signs from the 2009 MUTCD are not shown, are they proposed to be deleted? These signs should all be kept unless there is a reason to remove them. |
| 2M.09 | NO | YES | N/A | Consider adding an example of a trapezoidal advance guide sign to one of the figures in this Chapter. |
| 2N.02 | NO | YES | N/A | Figure 2N-1 – EM1-1 sign is erroneously labelled EM1-2 sign in this figure. Also, seems like some EM1-2 series signs are missing since the proposed text refers to a series but only one sign is shown. |
| Part 3 |  |  |  |  |
| 3A.03 | NO | YES | N/A | Green should be added to the list of allowable colors due to the addition of provisions for green pavement in bicycle lanes. |
| 3B.06 | YES | N/A | N/A | Sheet 1 of Figure 3B-13 is missing from the proposed figures attachment, would like to see this before Final Rule is published. |
| 3B.06 | NO | YES | N/A | Figure 3B-10 – In drawing B, the dotted white lane line across the option lane is called out as normal width but drawn wide. Also, there does not appear to be any text that refers to a recommendation or requirement to use a dotted white lane line here (this line is also shown in drawing E). |
| 3B.07 | NO | YES | N/A | Page 345, Lines 25-22 – Suggest combining these paragraphs since the line is proposed to be required for the taper and the full-width lane to improve clarity.  Page 345, Lines 27-35 – Suggest combining these paragraphs since the line is proposed to be required for both portions of the lane to improve clarity.  Page 346, Lines 13-16 – This sentence is not needed as paragraphs earlier in the section now require lane drop markings for added decelerations lanes.  Page 346, Lines 33-34 – This paragraph was taken out of context and does not make sense now since it referred to the previous paragraph. Suggest moving it back with the other paragraphs or revising so it can stand alone.  Also, the proposed figures depicting use of solid white lines for lane drops at exit ramps removed the word “option” from the callouts pointing to the lines, was this meant to be changed to Guidance instead of an option? |
| 3B.12 | NO | YES | N/A | Figure 3B-14 – Notes that are missing from the 2009 MUTCD version of this figure should be added. |
| 3B.30  3B.31 | YES | N/A | N/A | Figures 3B-28 and 3B-29 are missing from the proposed figures attachment, would like to see these before Final Rule is published. |
| 3C.05 | NO | NO | YES | Page 371, Lines 20-22 – The spacing between longitudinal elements should not be required to be uniform if lane widths vary as this will result in bars being placed within wheel paths, causing the markings to wear more quickly. |
| 3D.01 | NO | YES | N/A | Figure 3D-1 – Normal width part of lines between crosswalks and circulatory roadway on the south and east legs should be yellow.  Figure 3D-2 – Per proposed Section 3D.04, the yield lines on the multilane approach to the roundabout (south leg) are not optional.  Figure 3D-3 through 3D-8 – Show yield lines on multilane approaches that are required per proposed Section 3D.04. |
| 3E.02 | NO | NO | YES | Page 380, Lines 21-23 – Guidance should be changed to Standard to be consistent with proposed requirements for normal exits. |
| 3H.03 | YES | N/A | N/A | Regarding the use of aesthetic treatments at crosswalks, I agree with restrictions on aesthetic treatments with bright colors and/or complex and irregular geometry in crosswalks since bright colors and/or complex patterns may distract drivers, pedestrians, and other road users, and may cause accessibility issues for vision-impaired pedestrians. I suggest looking at allowing more variation in muted/faded colors to allow for more flexibility in aesthetic treatments. |
| 3J.03 | NO | YES | N/A | Figure 3J-2 – Double solid white line in drawing B should be yellow. |
| 3J.07 | NO | YES | N/A | Page 400, Lines 19-20 – This paragraph states that tubular markers are optional, but this conflicts with Figure 3J-6, which labels the tubular markers as recommended. |
| Part 4 |  |  |  |  |
| 4B.05 | YES | N/A | N/A | Page 411, Lines 17-18 – Suggest adding Rectangular Rapid Flashing Beacons as an alternative to traffic control signals when pedestrian safety is the major concern. |
| 4C.01 | NO | YES | N/A | Page 412, Lines 23-25 – Paragraph should read “Sections 8D.08 and 8D.14 contain information regarding the use of traffic control signals instead of gates and/or flashing-light signals at highway-rail grade crossings and highway-light rail transit grade crossings, respectively.” It does not make sense as written. |
| 4D.02 | YES | N/A | N/A | Page 423, Lines 31-32 – Agree with recommending pedestrian signal heads at marked crosswalks controlled by traffic control signals, but would also strongly recommend making this a requirement. As a pedestrian I do not feel safe when a crossing is controlled by a vehicular traffic signal as the yellow clearance interval is not long enough to allow a pedestrian to complete the entire crossing, and is thus completely inadequate at providing warning that the signal phase is changing. This means that some pedestrians will not be able to complete their crossing before the phase is terminated, creating possibilities for conflicts with vehicles. |
| 4D.08 | NO | YES | N/A | Page 428, Line 41-Page 429, Line 4 – Lists should be combined since height requirements for vertically and horizontally arranged signal faces are proposed to be the same. |
| 4F.01 | NO | YES | N/A | Page 438, Line 50-Page 439, Line 2 – This text is a duplicate of Section 4D.06 paragraph 11 (Page 428, Lines 4-9). |
| 4F.02 | NO | YES | N/A | Page 440, Line 46 – The YELLOW ARROW signal indication is needed during the permissive only mode to terminate a FLASHING YELLOW ARROW signal indication, when used. |
| 4F.09 | NO | YES | N/A | Page 447, Lines 51-52 – The YELLOW ARROW signal indication is needed during the permissive only mode to terminate a FLASHING YELLOW ARROW signal indication, when used. |
| Part 5 | YES | N/A | N/A | Other commenters have expressed concerns about the costs, but they seem to misunderstand that the provisions they are worried about are all contained within Guidance or Support statements and are thus not required. At most, they are recommended. I support this important information that informs jurisdictions as to the current best practices to accommodate Automated Vehicles (AVs) and allows them to decide whether to implement them.  I do also support the two paragraphs that are standard, related to pavement markings in Temporary Traffic Control (TTC) zones, as stricter requirements will benefit both AV and human drivers since current temporary pavement markings in TTC zones can often be less visible than permanent pavement markings. |
| Part 6 |  |  |  |  |
| 6B.01 | NO | YES | N/A | Page 525, Line 42 – Suggest deleting the first word on this line as it is redundant and potentially confusing to use other(s) twice in the same sentence. |
| 6G.02 | NO | NO | YES | Figure 6G.02 – Disagree with removal of signs compared to Figure 6F-3 from 2009 MUTCD, request that they be added back to show a more complete example of regulatory signs used in TTC zones. |
| 6H.01 | NO | NO | YES | Figure 6H.01 – Disagree with removal of signs compared to Figure 6F-4 from 2009 MUTCD, request that they be added back to show a more complete example of warning signs used in TTC zones. |
| 6H.08 | YES | N/A | N/A | FHWA should consider adding applicable uses of the proposed LANES MERGE signs (W4-8 and W9-4) in TTC zones to this section or an adjacent new section. |
| 6H.17 | YES | N/A | N/A | This sign is not shown in Figure 6H-1, please add it. |
| 6N.19 | NO | YES | N/A | Page 605, Lines 14 – This sentence is contradictory, suggest deleting “If used, ”. |
| 6P.01 | NO | YES | N/A | Figure 6P-20 – Cardinal directions for the signs at the left of the figure should be in CAPS, similar to Figure 6P-19.  Figure 6P-38 – Figure does not show W9-4 sign mentioned in the notes for the figure.  Figures 6P-47, 6P-48, and 6P-50 – Figures show BICYCLES MAY USE FULL LANE sign optionally used when lane width is <14’, but the notes for Figure 6P-47 say, “17 feet”. Also, the plaque shown in the figures says SHARE THE ROAD instead of the proposed ON STREET or ON ROADWAY. Lastly, it seems like the option statement in the notes for Figure 6P-47 should also be in the notes for Figures 6P-48 and 6P-50 since the same signs are shown on those figures as well. |
| Part 7 |  |  |  |  |
| 7B.06 | NO | YES | N/A | Page 675, Lines 4-5 – The beginning point of the speed zone should not be greater than 500 feet from what? Please clarify. |
| Part 8 |  |  |  |  |
| 8A.06 | NO | YES | N/A | Page 684, Lines 47-49 – This paragraph is redundant with paragraph 4 of proposed Section 8A.08 (Page 685, Lines 47-49). |
| 8B.01 | NO | YES | N/A | Page 690, Lines 12-14 – Second half of the sentence should be relocated to proposed Chapter 8C since it deals with pavement markings, not signs. |
| Part 9 |  |  |  |  |
| 9A.02 | NO | YES | N/A | Page 740, Lines 31-33 – Should the 10 foot clearance requirement for equestrians from Section 8E.03 be repeated here? (Page 730, Lines 38-40) |
| 9B.17 | NO | YES | N/A | Page 748, Lines 36-38 – The last sentence of paragraph 1 is redundant with paragraph 3 (Page 748, Lines 42-43). |
| 9D.03 | NO | NO | YES | Page 757, Line 11 – Disagree strongly with prohibiting bike symbols on Street Name signs. No reason for this was provided, and many cities such as Seattle and Minneapolis already use symbols on Street Name signs, which have been successful in establishing and marking bicycle routes. There are also already provisions for adding items such asroute shields and pictographs to Street Name signs, so this prohibition seems arbitrary and unnecessary. Lastly, a symbol is simpler, more elegant, and more immediately recognizable solution than a word message plaque affixed above the Street Name sign, which only increases sign clutter discouraged in Chapter 2A, especially in the urban environments where the plaque would be used. |
| Chap. 9E | NO | NO | YES | All Chapter 9E Figures – Disagree strongly with showing the use of the plain Bike Symbol in the figures and omitting the Helmeted Bicyclist Symbol from Figure 9C-3 of the 2009 MUTCD. The Helmeted Bicyclist Symbol should, at a minimum, be passively recommended by using it for marking bicycle lanes in all figures, if not also recommended explicitly in a guidance statement. There are multiple reasons why the Helmeted Bicyclist Symbol is superior to using World Legends and the plain Bike Symbol. Firstly, the Helmeted Bicyclist Symbol is more legible as the design is simpler and the strokes used are thicker. Secondly, it is distinct from the shared lane marking, which includes the plain Bike Symbol within it. Lastly, it is already used by most cities around the country, so it is recognized by most road users, and recommending a single marking type would promote uniformity. |
| 9E.06 | NO | YES | N/A | Page 772, Lines 19-20 – This Guidance is not necessary as lane extensions are already required by paragraph 8 of proposed Section 9E.03 (Page 770, Lines 24-25).  Figure 9E-6 – Drawing C shows double solid white lines right of the driveway which are not allowed per this section. |
| 9E.08 | NO | NO | YES | Page 774, Lines 25-26 – Seems like there should be a Guidance or Standard statement to go along with this Support paragraph. Suggest adding Guidance or Standard recommending or requiring lane extensions for counter-flow lanes. |
| 9E.11 | NO | YES | N/A | Page 776, Lines 26-27 – Section 9D.13 states that guide signing is required for optional turn boxes, but the text here states that the sign is optional. Suggest changing Section 9D.13 to make the signs optional.  Page 776, Lines 43-35 – Last sentence of this paragraph is repeated on Page 777, Lines 1-2.  Figure 9E-10 – Drawing D lacks the required bounding box around the Two-Stage Turn Box. |
| Appendix A2 | NO | NO | YES | Disagree with allowing a Series E(modified)-Alternate (hereafter referred to as Clearview) in any capacity, especially with the very narrow allowed use in this proposed revision.  As FHWA noted in its “Report on Highway Guide Sign Fonts” from 2018, all reputable studies comparing Clearview to the Standard Alphabets showed either no improvement in legibility or reduced legibility, depending on the application. As such, Clearview should not be allowed because its use would have to be limited to the specific applications where its legibility is not worse than the Standard Alphabets, which the proposed text does do. However, as also noted in the report, throughout the time that Interim Approval allowing the use of Clearview (IA-5) has been active, it has been repeatedly misused in applications not allowed by IA-5. Given the fact that the allowable uses under the proposed text in Appendix A2 are even narrower, it is likely that improper use would continue, or even increase, as the potential for misinterpretation would be much larger given the lengthy and specific requirements proposed. The potential for misuse in incorrect applications might be mitigated if Clearview did provide a tangible benefit, but given current data that suggest it is merely equivalent, allowing its use would only serve to decrease uniformity unnecessarily.  In addition, the larger letters and increased spacing of Clearview compared to the Standard Alphabets necessitates larger signs and increased costs. Costs are also increased by the need to train staff on the use of different standards applied to Clearview as well as licensing of the Clearview font itself. Again, given that there is no data to support that Clearview improves legibility, allowing its use incurs extra cost for no benefit. In conclusion, FHWA should disallow Clearview in its entirety due to its increased cost, lack of data supporting claims of increased legibility in any application, and potential for use in improper applications that reduce legibility.  In the future, if FHWA wants to look at increasing the legibility of fonts used on signs, FHWA could look at experimenting with implementing some of the aspects of Clearview with the Standard Alphabets, such as increased letter height, increased spacing between letters, and decreased stroke widths (potentially substituting Series E for Series E(modified)). |

**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.

|  |  |  |  |
| --- | --- | --- | --- |
| 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 |
| FHWA-2020-0001-0078 | YES | NO | Page 21, Lines 36-38 – What is meant by “side roadway”? Was this meant to be “site roadway open to public travel”? Suggest making this statement clearer. |