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.* | |
| N/A | YES | | N/A | N/A | | We agree with proposal to show the title of all specific traffic control devices in all upper-case letters. This may help searches in a print version. | |
| 1A.01 | NO | | YES | N/A | | Non-engineers, like local official, will use the MUTCD and make decisions – reword page 1, line 23 as such: "…traffic engineers, officials, or other authorities". And delete statement beginning on page 1, line 28. | |
| 1A.03 | NO | | NO | YES | | Bicyclists should be considered a different target road user than operators of motorized vehicles since they are not typically required to be licensed therefore a greater possibility for lack of awareness on the rules of the road. Also “Automated Vehicles” should be added as a target user to be consistent with the new Part 5 and since there are significant differences with human users. | |
| 1A.06 | NO | | NO | YES | | Since the UVC Is not updated and since statutes must be adopted legislatively references to the UVC and statutes needing to be consistent with it should be deleted; retitle section to “Rules of the Road”. | |
| Table 1B-1 | NO | | YES | N/A | | The 5-year compliance dates are too short since agencies program projects a number of years in advance- in our course 4 years. We suggest a minimum of 10 years for all compliance dates. | |
| **We agree with all other concepts and text as proposed in Part 1** | | | | | | | |
| 2A.04 | NO | | YES | N/A | | The phrase “other design features” in line 4, page 44 should be clarified- is something beyond border and margin width and design included? | |
| 2A.07 | NO | | YES | N/A | | Use of smaller sign sizes for lower volume rural roads should not be restricted by speed- delete reference on page 46, line 44 to 30 mph or less. | |
| 2A.11 | NO | | YES | N/A | | We are not familiar with the practice of limiting use of “NEW’ plaques for no longer than 6 months. How common is this practice- the highway agency might decide that a longer period is necessary. Consider deleting this change, page 50, line 18. | |
| 2A.19 | NO | | YES | N/A | | Proposed support statement on Vanity signs is not needed as general information signs are already prioritized amongst the other sign types, page 56, line 33. Recommendation for periodic sign clutter checks is a good theoretical concept but impractical- this review is more easily done during planning for sign modernizations or road construction, page 56, line 41. | |
| 2A.22 | YES | | N/A | N/A | | **The proposed change to the criteria for signing divided highway crossovers as either one or two intersections provides a more meaningful basis for making the determination. GOOD CHANGE** | |
| 2B.04 | NO | | YES | N/A | | On page 64, line 8 Standard requiring stops to be all way for use of ALL WAY plaque is proposed for deleted but it is not redundant to previous standard statement that required use for any all way stop- the two statements are making different points. The standard should be retained. | |
| 2B.06 | NO | | YES | N/A | | This section on page 65 contains some incorrect references. Reference to section on No Intersection Control is incorrectly given as 2B.04(c) should be 2B.09, line 1. Reference to section on Yield Control is incorrectly given as 2B.04(b) should be 2B.10, line 20. Reference to section on Minor Approach Stop Control is incorrectly given as 2B.04(a) should be 2B.11, line 23. The reference to section on All Way Stop Control is incorrectly given as 2B.04(f) should be 2B.12, line 25. Numbering is incorrect for list in Guidance statement beginning on line 26, page 65- two “B” s and no “E”. | |
| 2B.10 | NO | | YES | N/A | | Page 68, line 48 the reference to the figure showing YIELD signs in a divided highway intersection is incorrectly given as 2B-12, and 2B-15 - it should be 2B.17 | |
| 2B.12 – 2B.17 | NO | | YES | N/A | | The warrant in the current edition for all way stops that sets a threshold of crashes and volumes in combination at 80% or more of the criteria for crash and volume warrants individually is not included- was this intentional? If so, what is the reasoning? If not, it should be added back in. Also on page 71, line 34 an open-ended criterion as is being proposed here for peds and bikes can lead to an over proliferation of all ways stops. Minimum threshold values should be established. | |
| 2B.19 | NO | | YES | N/A | | On page 73, line 14, the 20 to 50 ft advance placement of R1-5 signs may on occasion not be possible due to field conditions- this statement should remain guidance | |
| 2B.21 | YES | | N/A | N/A | | **We agree with the proposed changes related to determining speed limits and believe that they result a good perspective on 85 percentile speed for the appropriate roadways (rural, high speed) while introducing more flexibility in optional criteria and methods for other roadways. Our agency is using expert systems to some extent, although not always, to validate speed limits – the proposed support statement is in line with this practice.** | |
| 2B.34 | NO | | YES | N/A | | On page 86, line 39, the reference to Fig 2B-3 is incorrect. It should be 2B-6 | |
| Figure 2B-11 | NO | | YES | N/A | | R4-8b "Keep Left" sign should be shown as optional as other signing might be more beneficial, e.g., route shield with turn arrow, or "left lane must turn left". | |
| 2B.50 | NO | | NO | YES | | The Large Arrow sign is not the best option for signing the circulatory roadway of a roundabout - one way arrow signs are more appropriate- retain R6-4 sign series (page 99, line 11). Several references are made to Figure 2B-16 that are incorrect, they should be to Figure 2B.15. see page 98, lines 28 & 53, page 99, line 6. | |
| 2B.73 | NO | | YES | N/A | | Title of section and references in it mention only phones but some states prohibit use of all handheld devices- rephrase to “phones and handheld mobile devices”. Page 114, line 15. | |
| 2C.04& Table 2C-2 | NO | | YES | N/A | | Deletion of the third sentence recommending that warning signs not be placed too far in advance is good provided it is clarified in table 2C-2 that the values are recommended target distances not recommended minimum distances. | |
| Table 2C-3 | YES | | N/A | N/A | | **Change to full stopping sight distance for condition B, 0 mph is needed and will prompt better placement. Our agency has already adopted this guidance on our own. GOOD CHANGE. We do have one suggestion though a range of distances should be indicated; if not provided signs could be placed too far in advance so that they would lose their effectiveness, i.e., road users would not associate the message with the actual condition.** | |
| Table 2C-4a | NO | | YES | N/A | | Clarification is needed as how ramps are to be categorized, e.g., as part of the Freeway or Expressway. | |
| 2C.06 | NO | | YES | N/A | | On page 123, line 7 the criteria for horizontal alignment warning signs should not include a directive to use the higher of the posted speed limit or 85 percentile speed as often the 85-percentile speed will not be known and not practical to study. Use of either should be an option. | |
| 2C.13 | NO | | YES | N/A | | Page 127: as proposed the speed feedback plaque can only be used with a speed limit sign- but other applications may be needed- add option for use with other signs like the ramp speed advisories, line 42. Also, there may be conditions where the speed feedback sign needs to be mounted with the curve warning sign (geometric or physical constraints)- statement requiring independent installation should be changed to guidance, line 45. The code for speed feedback plaque is inconsistent- change to W13-20P in line 38 and on figure 2C-4. Also on page 128, lines 1 & 2 the option to flash the speed when exceeded should be allowed as we have observed that it is effective in getting driver attention. | |
| 2C.25 | NO | | YES | N/A | | On page 133, line 19 reference to section 2C.XX should be 2C.22 | |
| 2C.25 | NO | | YES | N/A | | At times it is not possible to mount signs to be a bridge or to have multiple ground mounted sign (say left and right side of the road) so a version of a ground mounted sign indicating varying clearances should be added as an option, page 133, line 39. | |
| Figure 2C-14 | NO | | YES | N/A | | W4-1L sign towards the gore with mainline is not correct- should be a W4-1R | |
| 2D.01 | NO | | YES | N/A | | Reducing speeds to compensate for inadequate spacing for signs is not a practical option especially w/o regular enforcement- consider deleting this as a possible treatment- page 157, line 10. | |
| 2D.05 | NO | | NO | YES | | On page 159, line 1, the proposed standard for overhead guide signs for 12" caps/ 12"-9" UC/LC letter height may be impractical where destinations or street names are longer, e.g., 10' to 11'. We recommend that optional sizes be allowed for this scenario. 8"/6" UC/LC will be more practical for this circumstance and would also be sufficient for low-speed roadways | |
| 2D.11 & Figure 2D-5 | NO | | YES | N/A | | M1-1a should be described and/or an image added to the figure. Page 163, line 5. | |
| 2D.37 | NO | | YES | N/A | | Guidance statement on page 175, line 16 contains a typo “use” should be “used” | |
| 2D.45 | NO | | NO | YES | | Page 180, line 49: while no change in the acceptable color combinations for street name signs is proposed, the current language is too restrictive as the target road users will not mistake a post mounted street name sign for any other sign or traffic control device and since communities use colors that are of importance and have specific meaning to them. As a result, other color combinations should be allowed as optional for post mounted provided that adequate positive or negative contrast ratios are utilized, | |
| 2E.12 | NO | | YES | N/A | | Modified sentence beginning on page 204, line 18 should be reworded more clearly as such: “For words using all upper-case letters in expressway guide signs the minimum letter height shall be 8". | |
| 2E.18 | NO | | NO | YES | | Requirement for position of exit arrows on both overhead and ground mounted exit direction signs can lead to inefficient sign designs. Efficient sign design is a concern especially as the current structural design codes have are more demanding than in the past. An option for placement of arrows either centered on the bottom or on either side of the sign in the direction of the exit should be added- page 206, line 84. | |
| 2E.22 | NO | | YES | N/A | | On page 210, beginning line 37 the proposed standard on assigning exit number suffixes is too restrictive and may lead to undesirable numbering for the agency and businesses/destinations at the exit- i.e., drivers needing a different exit number pending direction of travel. We suggest that rather than requiring the suffix letters to ascend or descend in the proposed manner leave as an option to the highway agency so they can determine what is best at a location. There is an incorrect reference to Figure 2E10, it should be 2E-9 | |
| 2E.40 & 2E.42 | NO | | YES | N/A | | We support the proposed option for use of the modified arrow per lane sign and further would like to note that the full arrow per lane design is not always needed at major interchanges. Indiana uses and will continue to use full APL design at systems interchanges. Use of the modified APL sign should be an option at major interchanges as well as minor and intermediate. | |
| 2E.41 | YES | | N/A | N/A | | We support the alternative proposal to eliminate diagrammatic signs for freeways and expressways for option lanes. Our agency no longer uses diagrammatic signs in this situation as we have found them to be not as effective and an inefficient use of sign area (cumbersome). They should be retained for conventional and circular roadways. | |
| Table 2E-5 | NO | | NO | YES | | Minimum required arrow dimensions for APL signs are larger than they need to be. NCUTCD recommendations have been tested and found to be effective- these recommended arrow sizes be adopted. | |
| 2E.48 | NO | | YES | N/A | | On page 232, line 32 the proposed standard limiting real time travel info sign placement is not necessary- by the nature of this sign agencies carefully and strategically locate and they may be in advance of locations that normally experience operational issues. This standard should be deleted. | |
| 2H.07 | NO | | NO | YES | | On page 283, line 19 the allowable content for state welcome signs is too restrictive, Lt. Governors should be included in the option statement. On line 26 the standard statement prohibiting promotional advertising is also too restrictive as it would preclude tourism agency slogans/messages-prohibition should be rephrased to “business advertising”. | |
| 2H.09 | NO | | YES | N/A | | On page 284, lines 165 & 17 the standard requiring removal of project information signs immediately when work is completed would result in additional expense as contractors would have additional mobilization/demobilization. This component of the standard should be deleted. | |
| 2H.10 | NO | | YES | N/A | | On page 284, lines 28 -30 the guidance statement recommending that grade separation identification signs for overpasses should be installed on the fascia of the bridge seems contradictory to the option that they may be ground mounted Concerns may exist over mounting signs to any part of the bridge structure. This should be an option. | |
| 2H.14 | NO | | YES | N/A | | Page 289, line 35 the term “long corridor” Is not defined and therefore left open to interpretation. A description along the lines of “Statewide of segments connecting control cities or major urban areas” should be used rather than “long”. | |
| Table 2H-1 | NO | | NO | YES | | While no change is proposed on the limitation on overall size of acknowledgment signs the current limit is too small particularly for freeways where a 6’ x 4’ sign often would not adequately accommodate needed letter heights. For our sponsorship program letters could be no larger than 4” - a height which does not meet the minimum standard of 6” (min letter size for any roadway). So, this size limit is not compatible with good sign design practices and is inconsistent with other content in the MUTCD. The maximum limit should be not less than 10’ x 10’, other states designs should be accounted for in adjusting this limitation. | |
| 2I.08 | NO | | YES | N/A | | On page 294, lines 41, 45, and 50 pay phones were nearing obsolescence at the adoption of the 2009 edition and are obsolete now- the pay phone requirement should be eliminated. On page 296, lines 8 and 11 suggest replacing “PHONE” with the D9-4, D9-10, D9-16, or D9-22 service signs. | |
| Table 2I-1 | NO | | YES | N/A | | D9-15, D9-20, D9-21, and D9-22 should be added to the table | |
| Figure 2I-1 | NO | | YES | N/A | | D9-15, D9-20, D9-21, and D9-22 should be added to the figure | |
| 2I.15 | NO | | YES | N/A | | On page 301, line many changeable message signs displays are yellow, the option should be provided for either white or yellow displays. On page 302. Line 14 the 60 mile limit on placement of sign to any of the listed parking facilities seems arbitrary- this guidance should be deleted. | |
| 2J.01 | NO | | NO | YES | | Page 303, lines 9 & 10: a substantial number of logo signs are in suburban or low-density urban areas where motorists still benefit from this type of information- the exception for urban areas where adequate sign spacing can be maintained should be continued Page 303 Lines 44 & 45 and page 304 line 2: as pay phone are obsolete this requirement should be removed from the eligibility criteria for gas, food, and lodging. | |
| 2J.02 | NO | | NO | YES | | Page 305, lines 1 - 9 proposed guidance statement actually does not address the prompting issue, additionally there can be and are interchanges that have 6 or more attractions that can be effectively signed. This guidance and associated support statement should be deleted. | |
| 2J.03 | NO | | NO | YES | | Page 306, lines 10 & 11: many existing logo panels do not have borders, and a white border may conflict with some corporate logos (some logos have background so a white border would not be visible). Option for no border on business identification panels should be retained. | |
| 2J.03 | NO | | NO | YES | | Page 306, line 27-29: We disagree with limiting the use of alternative fuel supplemental message to GAS signs as alternative types of fuel, particularly electric charging- is often found at locations that are not gas stations. In this way we provide better, more informative signing for motorists. Supplemental messages for alternative fuels should be allowed on any type of logo signs | |
| 2K.02 | NO | | YES | N/A | | Page 313, line 4: many general service symbols are 18 in. in height (see Table 2I-1)- maximum height should for business logos should be comparable at 18 inches | |
| 2L.02 | NO | | YES | N/A | | Page 317, line 8: Guidance being proposed that would limit CMS use to where messaging changes/is variable. Generally, a good and true statement but there may be applications where a CMS provides short term or perhaps even long-term reinforcement of a message that does not change that needs additional emphasis. This should be allowed as an option based on engineering judgment. | |
| 2L.02 | NO | | NO | YES | | Page 318, lines 1 & 2 we do not agree with the proposal to recommend against certain type of information specifically, descriptions of persons, vehicle type and license plate. This information should be allowed as often the DMS alerts are the best way to communicate with the public and this information can be essential in finding the child. | |
| 2L.02 | NO | | YES | N/A | | Page 318, line 49: proposed recommendation is that homeland security and emergency messaging go through "significant scrutiny"- that term seems vague and could use further elaboration. | |
| 2L.04 | NO | | NO | YES | | Page 320, line 7: the proposed support statement seems redundant with other guidance already provided- it should be deleted | |
| 2L.04 | NO | | YES | N/A | | Page 320, line 52 & page 321 line 4: references to table 2A-2 are incorrect, they should be to table 2A-5 | |
| 2L.04 | NO | | YES | N/A | | Page 321, line 23: proposed guidance on max LED pixel pitch for symbols recognizes clarity but what about viewing distance? A pitch of 20mm corresponds to a viewing distance of about 225 ft. Are viewing distance and clarity concerns in opposition? | |
| 2L.05 | NO | | YES | N/A | | Page 321, line 39: no change from current edition is proposed but reference to table 2L-1 is now incorrect, should be to 2L-2 | |
| 2L.06 | NO | | NO | YES | | Page 322: this section repeats statements provided elsewhere and so should be deleted | |
| 2L.07 | NO | | YES | N/A | | Page 323, line 7: the last sentence in this paragraph is debatable- the amount of info on a travel time sign is necessarily significant to process particularly when no delay is indicated. | |
| 2L.08 | NO | | YES | N/A | | Page 323, line 30: the proposed recommendation that safety related messages be from the NHTSA list should be an option instead as there will be state based campaigns as well. | |
| 2L.09 | NO | | YES | N/A | | Page 323, line 41: the last sentence in proposed support is awkwardly worded (double negative); rephrase to “… it is common…” | |
| 2M.04 | NO | | NO | YES | | Page 326, lines 1- 4, INDOT has many brown background campground symbols on the state highway system, the general service symbols for this should not be blue from sign fabrication and aesthetic viewpoints. Statement should be an option | |
| 2M.10 | NO | | YES | N/A | | Page 329, line 44: vanity signs are discussed in Section 2A.19, this section should also be referenced. | |
| **We agree with all other concepts and text as proposed in Part 2** | | | | | | | |
| 3A.04 | NO | | YES | N/A | | Proposed increase in longitudinal line width will place additional burden on state and local agencies and it may not be necessary at least at this time as CAV technology is still developing and CAV deployment is still early. Expected budget impacts to Indiana state highway system are about $3M annually and additional crews and equipment may be needed to maintain production rates for restriping. Consideration should be given to adopting the NCUTCD recommendations for this section- this will lessen the impact to local agencies. See page 337, line 30. | |
| 3B.08 | NO | | NO | YES | | Page 348, line 8: the proposed guidance statement is not consistent with the standards in 3A.04- this should be a support statement noting the documented safety benefits of wider edge lines. | |
| 3B.16 | NO | | YES | N/A | | Page 354, line 39: no change is proposed but the current recommendation for spacing of RPMs on tangent sections is 120 ft but recent research, Bullough and Liu, Rensselaer Polytechnic Institute, Transport Magazine, indicates a much greater spacing is sufficient to provide the desired delineation. Recommended spacing should be no less than 200 ft or as determined by engineering judgment". <https://journals.vgtu.lt/index.php/Transport/article/view/12072> | |
| 3B.25 | NO | | YES | N/A | | Page 363, line 31: The proposed recommendation for chevrons entrance ramp gores is not necessary as entering traffic is and should be focusing not on the gore but on the adjacent lane and the traffic therein. This should be an option and separated from the rest of the guidance statement. It should also be noted that while chevron markings at either entrance or exit gores can be readily installed under construction projects agency budget and personal constraints may not allow for consistent, on-going maintenance | |
| 3B.30 & 3B.31 | NO | | YES | N/A | | Page 367: references are made to a Figures 3B-28 & 3B-29 that are not provided in the NPA | |
| Figure 3B-9 | NO | | YES | N/A | | This figure should include a detail of markings for a dual lane entrance ramp. | |
| 3B.25 | NO | | YES | N/A | | Page 363, line 25: a definition for the term “pedestrian desire line” would benefit some readers | |
| 3B.31 | NO | | NO | YES | | Page 367, line 25, the proposed standard requiring lane arrows marking approaching intersections within a diamond interchange with transposed alignment crossroads is not necessary. We have found that lane control signing is sufficient and is more useful for states that experience winter weather. The standard should be deleted. For simplicity and ease of reference the section should be retitled “Markings for Diverging Diamond Interchanges”- this term is widely used and understood. | |
| 3H03 | YES | | N/A | N/A | | **We agree with the proposed content of this section. We see potential value in allowing intricate/colorful designs at mid-block crossing where road users may not be looking for crossing activity but also feel that they provide no operational benefits at intersections.** | |
| 3J.05 | NO | | YES | N/A | | Page 399, lines 10 & 12, a description of what constitutes a "smaller island" should be added. | |
| **We agree with all other concepts and text as proposed in Part 3** | | | | | | | |
| 4C.01 | NO | | YES | N/A | | Page 413, line 13: the criteria for determining whether a location is a single intersection as opposed to two is provided in Chapter 2A – a reference to 2A.22 should be added | |
| 4L | YES | | N/A | N/A | | INDOT supports proposed new chapter on RRFBs, incorporating the Interim Approval. GOOD CHANGE | |
| 4L.02 | NO | | YES | N/A | | Page 487: 12" circular indications w/ the same rapid flashing pattern have been tested by TTI “Comparison of Rectangular and Circular Rapid Flashing Beacons”, Fitzpatrick, 2019 and proven to be effective. An option should be added to allow either shape. <https://journals.sagepub.com/doi/abs/10.3141/2492-08?casa_token=x517LEiReQcAAAAA:xG8i3KWxHL20w9NzLGmxLh6PPr2OjPZjC-9CHZPm0dA_Pawwh1pyVUHVSePADPSIjoMPqkHgXyGW> | |
| **We agree with all other concepts and text as proposed in Part 4** | | | | | | | |
| 5A.01 | NO | | YES | N/A | | Page 510, line 5: Clarification is needed on whether Part 5 applies at the discretion of the agency or jurisdiction when it is setting a roadway or segment of roadway for CAV or if it is intended to be applicable all the time regardless of specific agency plans. | |
| 5B.02 | NO | | YES | N/A | | Page 513, lines 32-34: The proposed guidance for 6" lines for all roads is OK if Part 5 is applicable at the discretion of the agency. Many states and counties will use 6" line widths for all roads since they will have to use for most of their system anyway (per Part 3), but this recommendation will have a bigger impact on cities. If Part This recommendation should be changed to support. Page 513, line 44: the recommendation on avoiding decorative crosswalk markings should be changed to a support statement as they are commonly used by municipalities | |
| 5B.04 | NO | | YES | N/A | | Page 514, line 22: END ROAD WORK signs are generally shown as typical or optional in Part 6. Unless Part 5 applies at the discretion of the agency the two parts should be reconciled | |
| 5B.04 | NO | | YES | N/A | | Page 514, line 38: The recommendation on 8" min width for channelizing devices needs clarification: is width at the base or at the narrowest part? This statement affects the use of tubular markers and cones so unless Part 5 applies at the discretion of the agency the statement should support rather than guidance. | |
| 5B.05 | NO | | YES | N/A | | Page 515, line 1: are Railroads preparing to or already deploying V2i at active grade crossings to communicate arrival of trains, has this practice been tried and successfully vetted? If not, recommendation should be deleted | |
| 5B.06 | NO | | NO | YES | | Page 515, line 12: the recommendation for physical separation of bike lanes from other vehicular traffic is a good practice from a safety perspective although quite often it may not be achievable (e.g., limited cross section width). The decision to take this measure is beyond the scope of the MUTCD and so should be deleted. | |
| **We agree with all other concepts and text as proposed in Part 5** | | | | | | | |
| 6A.02 | NO | | YES | N/A | | **Page 519, lines 36 – 42: revision to item D on the need to adjust TTC elements for the estimated queue length is a GOOD CHANGE. The first sentence should be corrected as lane closures do not always result in demand exceeding capacity- “may” instead of “will”** | |
| 6B.07 | NO | | YES | N/A | | Page 528, line 32: while no change is proposed here the END ROAD WORK sign is an option- per new Part 5 they are recommended. Unless Part 5 applies at the discretion of the agency the two Parts should be reconciled on this point. | |
| 6J.01 | NO | | YES | N/A | | **Page 562, line 21: We support lowering the mandate on removal of conflicting markings as there are situations where it is not practical to achieve- GOOD CHANGE. The phrase "as soon as practical", is subjective and not useful so should be deleted**. | |
| 6L.02 | NO | | NO | YES | | Page 575, line 44: While no change is proposed here the current statement on crashworthy performance criteria refers to section 6A.04 where the criteria is being deleted. AFADs and other trailer mounted devices are not crashworthy so the statement is impractical as well and should be deleted. | |
| 6M | NO | | YES | N/A | | Page 586, line 1: Title of this chapter is awkward and should be changed to “Other TTC Zone Design Features and Safety Devices" | |
| 6M.02 | NO | | NO | YES | | Page 586, lines 14 & 15: Requirement for use of positive protection to be based on engineering study is too restrictive. This should re-worded to “judgment” which allows for circumstances where a non-engineer might need to make the decision, e.g., a maintenance crew leader in deciding whether they need a Truck Mounted Attenuator for the day’s operation. | |
| 6M.02 | NO | | YES | N/A | | Page 586, lines 21-30: the list of circumstances to consider Positive Protection does not include separating opposing direction of travel (current MUTCD does include). This use should be retained. | |
| 6M.02 | NO | | YES | N/A | | Page 587, beginning line 24: the proposed deletion of support information includes figures that are not referenced elsewhere. Reference to figures 6H-37 & 6H-45 (current edition) should be provided. | |
| 6M.08 | NO | | YES | N/A | | Page 591, lines 22 & 25: We agree with change to the of this section- “Lighting” is more appropriate than “Floodlighting”. Floodlighting is still in used in some of the statements in the section-these should be changed to lighting as well. | |
| 6N.01 | NO | | YES | N/A | | **Page 593, line 40: We agree with adding a section on Rolling Roadblocks- GOOD CHANGE. Support statements that rolling roadblocks require coordination between mainline and entering ramp traffic and that Rolling slowdowns are preferred from a safety perspective should be added**. | |
| 6N.13 | NO | | YES | N/A | | Page 602, line 28: We agree with addition of statement on considering capacity, wording of first sentence needs editorial correction- “When the roadway capacity is reduced due to lane closures demand may the exceed available capacity”. | |
| 6N.19 & Figure 6N-1 | NO | | YES | N/A | | Page 605.line 12: We agree with content but recommended word messages for static signs is too restrictive and "Stay in Lane until merge point" may not be viable in certain jurisdictions at least as a regulatory message. Guidance statement should be amended to allow other wording for the static warning sign that is appropriate and make the regulatory sign optional | |
| 6P, Typical Applications | NO | | YES | N/A | | A note has been added to numerous Typical Applications that positive protection should be considered is redundant as it is shown in the figure and in the text. The added note also makes it seem as though positive protection is recommended rather than optional. This note should be deleted from all topicals except when recommended by the NCUTCD. | |
| 6P | NO | | YES | N/A | | TA-22: it is the "Right Lane Must Turn Right" sign that should be optional rather than the arrow boards as indicated in the figure as proposed | |
| 6P | NO | | YES | N/A | | Pages 633, 635, and 636: depending on the situation flashing arrow boards are recommended at times and not always optional. A note referring to the guidance statement 6L.06 on situations where flashing arrow board use is recommended should be added. | |
| 6P | NO | | YES | N/A | | On TA-28 the "60" Min" callout for pathway width should be "60" min recommended" | |
| 6P | NO | | YES | N/A | | TA-38 shows work in the middle lane with traffic running on both sides- this could result in safety and constructability issues on freeways. A support statement should be added to page 651 that consideration may be given to closing the left lane as well to enhance safety and constructability. | |
| 6P | NO | | NO | YES | | Page 664, line 12, TA-51- how is bike speed to be anticipated? Seems like there could be quite a bit a variation in this depending on the skill and condition of the biker and yet despite the variation the speed will be low compared motorized vehicles. This statement should be replaced with a simple typical or recommended spacing based on lower speed travel such as 15 or 20 mph- this change will eliminate work that is not meaningful. | |
| **We agree with all other concepts and text as proposed in Part 6** | | | | | | | |
| 7B.06 | NO | | YES | N/A | | Page 675, lines 4 & 5: the proposed maximum advance distance for placement of reduced school speed limit zones should not be set at a particular distance (500 ft is proposed) but rather based on engineering judgment where the appropriate distance to read the sign and slow to the reduced speed limit is accounted for. Also, the placement should reference not just the school grounds but optionally the first school drive. Our suggestion would reflect varying practices since school children are usually supervised when outside and that the speed limit often, but not always, is lowered based on bus/parent drop off and pick up times (“lower speed limit when flashing”) rather than presence of children on a school playground. | |
| 7D.01 | NO | | /YES | N/A | | Page 678, line 15: while no changes are proposed here some of the current qualifications for school crossing guards are subjective and are difficult to assess or document- items A, F, G, H, and I should be deleted as the other criteria encompass them anyway | |
| **We agree with all other concepts and text as proposed in Part 7** | | | | | | | |
| 8A.12 | NO | | YES | N/A | | Page 687, line 16 an additional support statement should be added that when installing a new circular intersection sufficient distance- 200 ft or greater - should be provided from any adjacent crossing. Page 687, line 31: Hybrid beacons have been successfully used on the approaches to a circular roadway that is near a crossing- eastbound SR 265 exit ramp to SR 62 in Jeffersonville, Indiana. Since the hybrid beacon was installed at this location, we have experienced no serious or fatal crashes. The hybrid beacon treatment should be added to the list. A new support statement should be added that "geometric improvements should provide a distance of more than 200 ft between the railroad crossing and the circular roadway". | |
| 8A.14 | NO | | NO | YES | | Page 688, line 41 the reasoning for lowering the mandate from standard to guidance on use of law enforcement or flaggers when a work zone operation would cause vehicles to stop on nearby tracks Is not provided. Seems like this additional protection would be a must- if so, the statement should remain a standard. | |
| 8B.16 | NO | | YES | N/A | | Page 698, line 10 while no change is proposed to this statement a recommendation should be added that the advance low ground clearance sign should be provided in advance of the logical detour point for affected vehicles. | |
| 8C.03 | NO | | YES | N/A | | Page 703, line 37: the proposed recommended stop line placement does not consider the dynamic envelope. The statement should be modified as such: "15 ft in advance of the nearest rail or outside the dynamic envelope whichever is greater" | |
| 8D.10 | NO | | YES | N/A | | Page 715, line 39: No upper limit for the distance between a crossing and traffic signal within which coordination is recommended is provided. A recommended upper limit, e.g., “expected queue length during the peak highway traffic period plus some buffer distance (say 100 ft)” should be added. Page 716, lines 31-33, | |
| 8D.12 | NO | | YES | N/A | | Page 720, lines 8 & 9. A statement either as support or guidance should be added that the use of automatic gates arms with flashing signal is preferred and offers the advantage of helping to control traffic from both highway approaches. | |
| 8D.12 | NO | | YES | N/A | | Page 721, line 12. Use of visibility limited signal indications may not work in many instances- this option should be deleted. . | |
| 8D.13 | NO | | YES | N/A | | Page 721, lines 49-51. An option to queue cutter signals should be added for queue cutter loops/detection- this would be tied to the traffic signals but serve the same purpose as the queue cutter. | |
| 8D.13 | NO | | YES | N/A | | Page 722, lines 49-51. Operating signal in flashing mode may confuse motorists- the signal should rest in green during off peak, non-queuing periods. | |
| 8D.13 | NO | | YES | N/A | | Page 724, line 4. Use of visibility limited signal indications may not work in many instances- this option should be deleted. . | |
| **We agree with all other concepts and text as proposed in Part 8** | | | | | | | |
| 9A.02 | NO | | YES | N/A | | Page 740, line 13: the last part of sentence is worded awkwardly- it should be reworded as such: "…can adversely impact public acceptance and enforcement” | |
| 9B.03 | NO | | YES | N/A | | Page 744, line 22: The proposed guidance statement seems equivocal, using the phrase "should be considered". Does this mean optional? This paragraph should be an option worded with "may be used" | |
| 9B.04 | NO | | YES | N/A | | Page 745, line 16: "is allowed" should be "are allowed" | |
| 9B.18 | NO | | NO | YES | | Page 749, lines 9 & 10: Proposed standard lists where two stage bike boxes are required but implies that they may be required at other locations not listed- this results in an incomplete standard. The sentence should be "Two stage bike boxes are required at these locations: (items A, B C)” | |
| 9D.09 | NO | | YES | N/A | | Page 763, line 7: the proposed standard prohibits sponsorship of bike parking areas- correct for advance or directional signing but seems unnecessary for signs at/within the parking area and would be inconsistent with the practice of allowing sponsorship of other services. The prohibition should be limited to signs that are outside the parking area. | |
| 9D.12 | NO | | YES | N/A | | Page 766, line 1: the proposed standard is worded inconsistently- stating that color coding shall not be used, then stating if color coding is used. The prohibition against color coding should be removed by deleting "Color coding or”: from beginning of this paragraph | |
| **We agree with all other concepts and text as proposed in Part 9** | | | | | | | |
| Appendix A-1 | | YES | N/A | | N/A | | INDOT does not nor do we plan to use Clearview font for our freeway/expressway guide signs. But we support the option for other agencies to do so provided proper sign design practices are followed. |

**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 |
| (**EXAMPLE**)  FHWA-2020-0001-59 | YES | N/A |  |
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