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.

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| 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 – I support the reorganization of Part 1 and the text changes described in NPA item 1. |
| 1A.01 | YES | N/A | N/A | Agree – I support new Section 1A.01. |
| 1A.02 | NO | YES | N/A | I generally support the revisions presented in Section 1A.02. However, the proposed revisions provide a clunky relationship between the 1A.02 definition and the Part 1C.02 definition of traffic control devices. I recommend replacing "Definition" from the Section Title and retain "Purpose" of Traffic Control Devices. Definitions appear as Standards in the MUTCD so providing a "definition" in Section 1A.02 seems inconsistent with other definitions in the Manual. |
| 1A.03, 1A.04 | YES | N/A | N/A | I support the addition of Sections 1A.03 and 1A.04. |
| 1A.05 | NO | YES | N/A | I support updates to the list of publications referenced in the MUTCD. I ask that the list be further refined to reference current versions of the references. I also ask that references to "latest versions" not be used in the Manual because it’s not possible to comment on future revisions that do not exist, only current references.  I oppose reference no. 14, "Guidelines for Determining Traffic Signal Change and Clearance Intervals." I have concerns about the new content and await the results of a Pooled Fund Study to develop guidelines. In the interim I respectfully request that FHWA retain the current reference for determining yellow change and red clearance intervals. |
| 1A.06, 1B.01 | YES | N/A | N/A | I support the revisions to Sections 1A.06 and 1B.01. |
| 1B.02 | NO | YES | N/A | I generally support the revisions to Section 1B.02 but have some concerns. The documents that are subject to FHWA review are outlined in Stewardship and Oversight Agreement that State DOTs develop with FHWA Division offices and therefore are already in conformance with the MUTCD and do not need to be listed in Section 1B.02.  I would like to see agencies be able to provide information about which interim approvals an agency has been given permission to use and the conditions for their use. As currently written, Section 1B.02 will discourage inclusion of interim approval information in agency references. I therefore respectfully ask that FHWA delete the last guidance statement in the section. |
| 1B.03 | YES | N/A | N/A | I support the revisions to Section 1B.03. |
| 1B.03 to 1B.09 | NO | YES | N/A | I support reorganizing existing Section 1A.10 into seven new Sections. Figures 1B-1 and 1B-2 are labelled as 1A-1 and 1A-2 in supporting files posted in the Federal Register and should be renumbered. |
| 1B.06 | YES | N/A | N/A | I support the new section and clear information about experimentation requirements. |
| 1B.08 | YES | N/A | N/A | I support the new Section 1B.08 and encourage FHWA to continue with the interim approval process in the future. |
| 1B.09 | NO | YES | N/A | I support the new Section 1B.09. If appropriate to include, I will support added support text explaining what constitutes content appropriate for official requests versus when unofficial communication with the MUTCD team is appropriate. |
| 1C.01 | YES | N/A | N/A | I support the revisions to Section 1C.01. |
| 1C.02 | NO | YES | N/A | I generally support the definitions as written. Definitions that are not included, but that may be helpful include: Diamond Interchange with Transposed Alignment Crossroad (or Diverging Diamond Intersection if that is the preferred term), Interstate, Parking Lanes, Rotaries, Traffic Circle, and Side Roadway.  In definition 44 – Crashworthy – the definition of the term should end with the proposed first sentence. Reference to other publications, even virtual, should be included in proposed Section 1A.05. If further information regarding crashworthy hardware or appurtenances is warranted, consideration should be made to adding a new section. Reference to roadside appurtenances that are not traffic control devices is not necessary.  In definition 265 – Traffic Control Device – please see my comment to Section 1A.02. The definition of Traffic Control Device ends with the first sentence. The rest of the material, if warranted, belongs in Section 1A.02. |
| 1C.03 | YES | N/A | N/A | I support the revisions to Section 1C.03. |
| 1D.01 | NO | YES | N/A | I support the revisions to Section 1D.01. As a note of commentary, the word "all" is usually unnecessary and can be deleted. Use of the word "all" doesn't enhance the meaning and its absence does not lessen the meaning of the sentence. I respectfully ask FHWA to delete "all" from the Standard sentence and throughout the Manual as appropriate. |
| 1D.02 | YES | N/A | N/A | I support the revisions to Section 1D.02. |
| 1D.04 | NO | YES | N/A | I support the new Section 1D.04. However, 23 CFR 1.23(b) does not apply to all roads open to public travel and should not be referenced in the MUTCD. Therefore I respectfully request that the support statement containing the CFR reference be deleted. |
| 1D.05, 1D.06, 1D.07 | YES | N/A | N/A | I support the revisions to Sections 1D.05, 1D.06, and 1D.07. |
| 1D.08 | YES | N/A | N/A | I appreciate the added information and examples regarding where proprietary products are appropriate and where they are not. |
| 1D.09, 1D.10, 1D.11 | YES | N/A | N/A | I support the revisions to Sections 1D.09, 1D.10, and 1D.11. |
| 2A.01 | NO | YES | N/A | I strongly support Guidance recommending against signs for "rules of the road"; however, I note that there are a growing number of rules of the road signs included in the MUTCD and ask that these signs not be included in the MUTCD. The new or revised signs shown in Figure 2B-31 are examples of these "rules of the road" signs that seem to conflict with Section 2A.01. |
| 2A.02 | YES | N/A | N/A | I support the revisions to Section 2A.02. |
| 2A.04 | NO | YES | N/A | I support the revisions to Section 2A.04 and strongly encourage FHWA to produce a new edition of the Standard Highway Signs book as a companion to this new edition of the MUTCD. |
| 2A.05 | NO | YES | N/A | I support the revisions to Section 2A.05. Table 2A-4 should be renumbered to Table 2A-1 to match the text. |
| Table 2A-5 | NO | YES | N/A | Table 2A-5 should be renumbered to Table 2A-2 to match the text. |
| 2A.07 | YES | N/A | N/A | I support the revisions to Section 2A.07. |
| 2A.08 | NO | YES | N/A | I support the revisions to Section 2A.08 and respectfully ask FHWA to delete the word "all" throughout the section. The word "all" is usually unnecessary and can be deleted. Use of the word "all" doesn't enhance the meaning and its absence does not lessen the meaning of the sentence. I respectfully ask FHWA delete "all" from the Standard sentence and throughout the Manual as appropriate. |
| 2A.09, 2A.10, 2A.11 | YES | N/A | N/A | I support the revisions to Sections 2A.09, 2A.10, and 2A.11. |
| 2A.12 | NO | YES | N/A | I support the revisions to Section 2A.12. In Figure 2A-2, I question why the 6 ft. Min. offset is significant in H - Overhead Sign. The offset isn't for the placement of the sign and 6 ft. from the shoulder does not appear to be a dimension of significance. The dimension isn't a problem, but perhaps the offset distance on H - Overhead sign is unnecessary. |
| 2A.14 | NO | YES | N/A | I generally support the revisions to Section 2A.14. I respectfully ask that the MUTCD reflect NCUTCD 20B-RW-01 regarding signs placed more than 30' from the edge of the traveled way.  In P4, I respectfully ask FHWA to move "in rural areas" to the beginning of the sentence so that it reads, "In rural areas, the minimum height..."  In P5, I respectfully ask FHWA to move "in business, commercial, or residential areas" to the beginning of the sentence so that it reads, "In business, commercial, or residential areas, the minimum height..."  In P8, I respectfully ask FHWA to simplify and reword the first sentence to read: “If the bottom of a secondary sign mounted below another sign is lower than 7 feet above a pedestrian sidewalk or pathway…” |
| 2A.15 | YES | N/A | N/A | I support the revisions to Section 2A.15. |

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| 2A.17 | NO | YES | N/A | I generally support the revisions to Section 2A.17. However, I have concern about the last sentence of the last Standard which will require solar panels to be mounted below or behind signs. I agree that equipment must not detract from or obscure the face of the sign, but think it reasonable that these principles can be achieved without restricting the location of solar equipment to less than optimal locations. |
| 2A.19 | NO | YES | N/A | I generally support the revisions to Section 2A.19. I would like to see additional information about vanity signs in that the support paragraph leaves some question regarding what constitutes vanity signs.  I support the first two sentences of the new Guidance paragraph at the end of the section. While I agree with the third sentence of the new guidance paragraph, I have some concern that this will create a mandate for agencies to implement a periodic review schedule. I see the first two sentences as adequate and respectfully ask FHWA to delete the last sentence. |
| 2A.20 | NO | YES | N/A | I support the revisions to Section 2A.20. I support the text relating to LED units, but I respectfully ask FHWA to move the text regarding LED units to a new section since the LED units do not directly relate to retroreflectivity or illumination of the sign. I think the information will be better served in its own section.  Tables 2A-1 and 2A-2 should be renumbered to Tables 2A-3 and 2A-4 to match the text. |
| 2A.21 | NO | YES | N/A | I generally support the revisions to Section 2A.21. However, I have concern about adding retroreflectivity requirements for signs with blue and brown backgrounds. Signs with blue and brown backgrounds typically are a lower priority than regulatory, warning, and guide signs and therefore have a lower priority for inspection and replacement. I respectfully ask FHWA to retain the exception for signs with blue or brown backgrounds.  Table 2A-3 should be renumbered Table 2A-5 to match the text. |
| 2A.22 | NO | YES | N/A | I generally support the revisions to Section 2A.22. However, I respectfully ask FHWA to add information indicating that the section does not pertain to divided highway median openings that are intended for authorized vehicles where the R5-11 sign applies. |
| Chapter 2B | YES | N/A | N/A | I support the reorganization and subchapter headings. Further, I would like to see FHWA implement subchapters in Chapter 6F rather than dividing that Chapter into many Chapters. |
| 2B.01 | YES | N/A | N/A | I support the revisions to Section 2B.01. |
| 2B.02 | NO | YES | N/A | I generally support the revisions to Section 2B.02. However, I recommends moving the information about LEDs to a new section suggested in my comment for Section 2A.20. |
| 2B.03 | YES | N/A | N/A | I support the revisions to Section 2B.03. I also express support for deletion of the Standard paragraphs regarding STOP sign sizes. These paragraphs in the 2009 MUTCD have previously caused confusion for colleagues. |

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| 2B.04, 2B.05, 2B.06, 2B.07, 2B.08, 2B.09, 2B.10, 2B.11, 2B.12 | YES | N/A | N/A | I support the revisions to Sections 2B.04, 2B.05, 2B.06, 2B.07, 2B.08, 2B.09, 2B.10, 2B.11, and 2B.12. |
| 2B.13 | NO | YES | N/A | I generally support the new Section 2B.13. However, I respectfully ask FHWA to clarify whether only one of the options should be met or multiple options. |
| 2B.14, 2B.15 | YES | N/A | N/A | I support the revisions to Sections 2B.14 and 2B.15. |
| 2B.16 | NO | YES | N/A | I generally support the new Section 2B.16. However, I respectfully ask FHWA to clarify whether only one of the options should be met or multiple options. |
| 2B.17, 2B.18 | YES | N/A | N/A | I support the revisions to Sections 2B.17 and 2B.18. |
| 2B.19 | NO | YES | N/A | I generally support the revisions to Section 2B.19. However, I respectfully ask FHWA to delete "multi-lane" so the signs may be used in advance of any uncontrolled approach. |
| 2B.20 | NO | YES | N/A | I support the revisions to Section 2B.20. However, I respectfully ask FHWA to move the Standard in P12 to P3 to emphasize this message earlier in the section. Too often, well-meaning users of these devices perceive that the STOP FOR legend is superior to the YIELD TO legend and purchase and implement the wrong signs where state laws indicate the requirement to YIELD TO PEDESTRIANS. |
| 2B.21 | NO | YES | N/A | I generally support the revisions to Section 2B.21. I also endorse the comments made by John Fisher in document “John Fisher – FHWA-2020-001-2770\_attachment\_1.”  I respectfully ask FHWA to delete "on freeways or expressways" from P3 and to delete P4. I foresee the text, as proposed, leading to increased contention regarding speed limits.  I generally do not concur with or support the recommendations of the NTSB report. The NTSB report does not appear to have been written by Traffic Engineering professionals and gives me the impression that it is promoting an agenda rather than to improve traffic engineering principles. Regarding FHWAs request for comment, I provide the following:  (1) I support retention of the 85th-percentile speed as a consideration in setting speed limits for all roadways. The 85th-percentile is a measurable and repeatable value, where many of the other factors are subjective.  (2) I support use of an expert system (USLIMITS2) to validate a speed limit that has been determined through an engineering study.  (Other) Idaho is one of the states without automated speed enforcement laws. The idea of such laws are unlikely to be enacted in Idaho in the foreseeable future.  Further, I do not support blanket application of the "safe system approach" to speed limits.  In the final Support statement, reference should be to Section 2C.13 for the provisions for the use of a Vehicle Speed Feedback plaque mounted below or near a Speed Limit Sign. |

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| 2B.22, 2B.24, 2B.25, 2B.26, 2B.27 | YES | N/A | N/A | I support the revisions to Sections 2B.22, 2B.24, 2B.25, 2B.26, and 2B.27. |
| 2B.28 | NO | YES | N/A | I generally support the revisions to Section 2B.28.  I frequently sees the R3-7 sign overused and I supports the AASHTO comment that the R3-7 (Left Lane Must Turn Left) signs should only be used at dropped lanes (i.e. should not be used at "ordinary" turn lanes) for left-turn and right-turn applications.  I agree with clarifying that R3-20L & R3-20R signs are intended only where a part-time shoulder lane becomes a mandatory turn lane. To that end, line 25 should be revised to read "On a conventional road where left-hand shoulder that is open to part-time travel becomes a mandatory left turn lane ..." to mirror the previous sentence about right-hand shoulders. |
| 2B.29 | YES | NO | N/A | I support the revisions to Section 2B.29. |
| 2B.30 | NO | YES | N/A | I generally support the revisions to Section 2B.28. However, with regard to the last Standard regarding use of the R3-5bP and R3-5fP plaques, I respectfully ask FHWA to add "mounted above the R3-8 sign" to the end of the sentence. Otherwise this sentence has the potential to be misinterpreted to mean the sign assembly must be mounted above the road. |
| 2B.31, 2B.32, 2B.34 | YES | N/A | N/A | I support the revisions to Sections 2B.31, 2B.32, and 2B.34. |
| 2B.38 | NO | YES | N/A | I generally support the revisions to Section 2B.38. I support the differentiation in use of KEEP RIGHT EXCEPT TO PASS where there are two lanes and SLOWER TRAFFIC KEEP RIGHT where there are multiple lanes. I have seen the KEEP RIGHT EXCEPT TO PASS sign where a passing lane is added on a normally two-lane highway. However, I have concern that the SLOWER TRAFFIC KEEP RIGHT sign has the potential for overuse and I have seen agencies receive pressure from lawmakers and highway users to install these signs out of a misperception that drivers traveling less than the speed limit in the left hand lane is a significant safety issue. Therefore I respectfully ask FHWA to indicate that the sign is to be used sparingly or not at all in accordance with Sections 2A.01 and 2A.19. |
| 2B.39 | NO | YES | N/A | I generally support the revisions to Section 2B.39. However, in P1 and P2 I see overlap with Section 2B.38. I respectfully ask FHWA to revise or reorganize P1 and P2 to remove the overlap. |
| 2B.40 | NO | YES | N/A | I generally support the revisions to Section 2B.40. However, I have concern that the phrase "channelizes traffic away from the approach direction" in the new guidance in P4 will not be applied consistently by MUTCD users. I therefore respectfully ask FHWA to make the statement an option rather than guidance.  I also respectfully ask FHWA to delete the new support statement in P11. The support statement is presented in Section 2B.40 and is therefore it is unnecessary for the support statement to indicate what is in Section 2B.40. |

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| 2B.41 | NO | YES | N/A | In conjunction with my comment on Section 6G.07 and for Typical Application 36 in Chapter 6P, I respectfully ask FHWA to revise P2 as follows:  "Except as provided in Section 6G.07, STAY IN LANE signs should be accompanied by double solid white lane lines to prohibit lane changing." |
| 2B.45 | NO | NO | YES | I do not support the addition of Section 2B.45. The ALL TRAFFIC and RIGHT (LEFT) TURN ONLY signs seem redundant with other standard signs and unnecessary. |
| 2B.46 | NO | YES | N/A | I generally support the revisions to Section 2B.46. However, I see the list of potential exclusions to include many of the symbols in the Chapters 2B and 2C. Rather than attempting to make a list of signs that include symbols from standard signs, I would prefer a statement that says the symbols from signs in Chapters 2B and 2C can be used to create exclusionary message signs. |
| Sub-chapter in 2B (NPA item 83) | YES | N/A | N/A | I support the proposed revisions. |
| 2B.47, 2B.48, 2B.49, | YES | N/A | N/A | I support the revisions to Sections 2B.47, 2B.48, and 2B.49. |
| 2B.50 | NO | YES | N/A | I support many of the revisions to Section 2B.50. However, I do not support changes to P11 or the addition of P12.  I support retention of the R6-4 Roundabout Directional Arrow sign.  Regarding P12, road users are given many visual cues on the approach to a roundabout, including use of the W2-6 warning sign and associated plaques, and therefore use of the R6-5P plaque isn't expected to have a significant impact at the YIELD sign, except at Mini-Roundabouts as shown in Figure 2B-21. |
| 2B.51 | YES | N/A | N/A | I support the revisions to Section 2B.51. |
| 2B.52 (NPA items 89 and 91) | NO | NO | YES | I do not support the proposed revisions to Section 2B.52. I respectfully ask FHWA to retain the 2009 MUTCD language. |
| NPA item 90 | NO | NO | YES | I do not support the deletion of Section 2B.43. I respectfully ask FHWA to retain the R6-4 Roundabout Directional Arrow sign. The One-Direction Large Arrow sign should be reserved for sharp curves as has been the case through numerous editions of the MUTCD. |
| NPA item 92 | NO | YES | N/A | I support the deletion of Section 2B.45.  In Figures 2B-22 and 2B-23, I respectfully ask FHWA to restore the R6-4 series of signs to the figure, remove the One-Direction Large Arrow sign, and to indicate that use of the R6-5P plaque is optional or to remove the R6-5P plaque from the figures. |
| 2B.53, 2B.54, 2B.55, 2B.56, 2B.57, 2B.58, 2B.59 | YES | N/A | N/A | I support the revisions to Sections 2B.53, 2B.54, 2B.56, 2B.57, 2B.56, 2B.57, 2B.58, and 2B.59. |

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| 2B.60 | NO | YES | N/A | I generally support the revisions to Section 2B.60. However, I respectfully ask FHWA to delete the LEFT TURN YIELD ON FLASHING RED ARROW AFTER STOP (R10-27) FROM P2. I do not support the idea of using a second traffic control device to describe use of the first traffic control device. If such an educational message is needed, then the traffic control device should be redesigned or discontinued. Please also see my comment for Section 4F.04. |
| 2B.61 | NO | YES | N/A | I generally support the revisions to Section 2B.61. However, I respectfully ask FHWA to delete the R10-17a sign and P9. I see the R10-17a sign as marginalizing the meaning of a RED ARROW signal indication. Please also see my comment for Section 4A.03.  Further, P1 makes no differentiation between a CIRCULAR RED signal indication and a RED ARROW signal indication. A R10-11 series sign should not be required where a RED ARROW signal indication is used. |
| 2B.62 | YES | N/A | N/A | I support the revisions to Section 2B.62. |
| 2B.65 | NO | YES | N/A | I generally support the revisions to Section 2B.65. However, I often see this sign overused and used where only a portion of the road is closed. I respectfully ask FHWA to add text similar or the same as the standard from Section 6G.04. Please also see my comment for Section 6G.04. |
| 2B.66 | NO | YES | N/A | I generally support the revisions to the section with the following comments:  I support the Standard to use only the truck symbols depicted.  I have seen truck length restrictions on some mountainous winding highways not just weight restrictions. I respectfully asks FHWA to add a new Section for posting length restrictions. |
| 2B.67 | NO | YES | N/A | I support the renaming of this section and respectfully ask FHWA to make the same revisions to the titles of Sections 2D.51 and 2E.53. |
| 2B.68 | YES | N/A | N/A | I support the revisions to Section 2B.68. |
| 2B.71 | NO | NO | YES | I appreciate the notion of standardizing signs relating to rules of the road. However, I do not support a sign or a section in the Manual instructing highway users to move crashed vehicles to the shoulder of the highway. This proposed sign, along with the "Move Over or Reduced Speed" sign described in Section 2B.72 and the "No Hand-held Phone Use by Driver" sign described in Section 2B.73 are contrary to proposed Guidance recommending against signing for rules of the road in Section 2A.01 and sign clutter concepts in Section 2A.19. |

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| 2B.72 | NO | NO | YES | I appreciate the notion of standardizing signs relating to rules of the road. However, I do not support the creation of a Move Over or Reduce Speed sign because such a sign conflicts with the principles in Section 2A.01 and 2A.19.  A concern I have with this sign is that many states have "move over" laws, but the laws can and do vary from state to state. For example, Idaho's move over law is different than Utah's or California's.  Further, I have experienced a version of a "move over" sign used, but overused by well-meaning agency staff that installed the sign on two-lane highways where the "move over" component of Idaho law did not apply.  I live in Idaho and our state "move over" law was revised a few years ago and I do not know how to concisely conveys the law on a sign as the actions required of highway users and the conditions where the law applies is rather complex for a sign. For this law it seems more appropriate to use educational messages for rules of the road rather than through highway signs. I believe that agencies should use standard MUTCD signs whenever practical, but in this case, similar but different “move over” laws vary enough from state to state to make it impractical to standardize one sign legend. |
| 2B.73 | NO | NO | YES | I appreciate the notion of standardizing signs relating to rules of the road. However, I do not support a sign or a section in the Manual instructing highway users not use hand-held phones. This proposed sign, along with the "Move Over or Reduced Speed" sign described in Section 2B.72 and the "Minor Crashes Move Vehicles from Travel Lane" sign described in Section 2B.71 are contrary to proposed Guidance recommending against signing for rules of the road in Section 2A.01 and sign clutter concepts in Section 2A.19. |
| 2B.75 | NO | YES | N/A | I generally support the revisions to Section 2B.75. However, I do not see where the seat belt symbol is described or shown in the NPA. The reference to Section 2A.06 does not appear to be correct. Further, I would like to see additional guidance for the appropriate use of the seat belt symbol. FHWA has previously provided an interpretation about the propriety of messages, such as those for seat belt use, being used beneath STOP signs and I respectfully ask FHWA to provide end user guidance like this in the Manual. |
| 2B.77 | YES | N/A | N/A | I support the revisions to Section 2B.77. |
| Chapter 2C | NO | YES | N/A | I support the proposed structure. |
| Deleted 2C.01 | YES | N/A | N/A | I support the deletion of the 2009 MUTCD’s Section 2C.01. |
| 2C.01 | YES | N/A | N/A | I support the revisions to Section 2C.01. |
| 2C.02 | NO | YES | N/A | I support the revisions to Section 2C.02. As a note of commentary, the word "all" is usually unnecessary and can be deleted. Use of the word "all" doesn't enhance the meaning and its absence does not lessen the meaning of the sentence. I respectfully ask FHWA to delete "all" from the Standard sentence and throughout the Manual as appropriate. |
| 2C.03 | NO | YES | N/A | I support the revisions to Section 2C.03. As a note of commentary, the word "all" is usually unnecessary and can be deleted. Use of the word "all" doesn't enhance the meaning and its absence does not lessen the meaning of the sentence. I respectfully FHWA to delete "all" from the Standard sentence and throughout the Manual as appropriate. |
| 2C.04, 2C.05, 2C.07, 2C.08 | YES | N/A | N/A | I support the revisions to Sections 2C.04, 2C.05, 2C.07, and 2C.08. |
| 2C.06 | YES | N/A | N/A | I support new Section 2C.06. |
| 2C.09 | NO | YES | N/A | I think the Combination Horizontal Alignment/Advisory Speed signs were a useful tool. However, I do not oppose the deletion of the Section if FHWA thinks it is appropriate to do so. |
| 2C.10 | NO | NO | YES | I respectfully ask FHWA to retain the Roundabout Directional Arrow Signs and to remove the draft guidance to use the One-Direction Large Arrow Sign in roundabouts. |
| 2C.11, 2C.12 | YES | N/A | N/A | I support the revisions to Sections 2C.11 and 2C.12. |
| 2C.13 | NO | YES | N/A | I support new Section 2C.13 and thank FHWA for providing information about these signs in the MUTCD. I hope the new section will help to standardize the devices that are being manufactured and sold. |
| 2C.14, 2C.16 | YES | N/A | N/A | I support the revisions to Sections 2C.14 and 2C.16. |
| 2C.18, 2C.19 | NO | YES | N/A | I generally support the revisions to Sections 2C.18 and 2C.19. I respectfully ask FHWA to reword P1 of section 2C.18 to clarify the appropriate conditions for using NARROW BRIDGE and appropriate conditions for using NARROW UNDERPASS. As written it seems that the "conditions" are the same for both signs and that they are interchangeable.  I have a similar comment and suggestion for P1 and P2 of Section 2C.19. |
| 2C.24 | NO | YES | N/A | I support the revisions to Section 2C.24. The reference to Section 2C.XX in the last paragraph should be corrected. |
| 2C.25, 2C.26, 2C.28, 2C.30, 2C.34, 2C.35 | YES | N/A | N/A | I support the revisions to Sections 2C.25, 2C.26, 2C.28, 2C.30, 2C.34,and 2C.35. |
| 2C.36 | NO | YES | N/A | I support the revisions to Section 2C.36. I have observed the W3-3 signs being overused and I respectfully ask FHWA to reproduce Table 4D-2 in this section. |
| 2C.37 | YES | N/A | N/A | I support new Section 2C.06. |
| 2C.39 | YES | N/A | N/A | I support the revisions to Section 2C.39. |
| 2C.40 | NO | YES | N/A | I generally support the revisions to Section 2C.40. I appreciate the addition of the W3-5b and W3-5c signs. However, I respectfully ask FHWA to delete the W3-5a sign since I overwhelmingly prefer use the W3-5 sign instead. |
| 2C.41 | YES | N/A | N/A | I support new Section 2C.41. |
| 2C.42 | NO | YES | N/A | I generally support the revisions to Section 2C.42. However, I disagree with the deletion of the option to vary the width of the intersecting road relative to the importance of the road. I respectfully ask FHWA to restore this option. The ability to change the width of the line representing the intersecting road is a useful tool that I recommend be retained. |
| 2C.43, 2C.44 | YES | N/A | N/A | I support the revisions to Sections 2C.43 and 2C.44. |
| 2C.45 | NO | NO | YES | I do not support the addition of the new guidance statement and respectfully asks FHWA to omit it from the next edition of the MUTCD. |
| 2C.46 | NO | NO | YES | I do not support the addition of the new guidance statement and respectfully asks FHWA to omit it from the next edition of the MUTCD. |
| 2C.47 | YES | N/A | N/A | I support the revisions to Section 2C.47. I support the removal of the LANE ENDS MERGE LEFT (RIGHT) (W9-2) sign. |
| 2C.48, 2C.49, 2C.52 | YES | N/A | N/A | I support new Sections 2C.48, 2C.49, and 2C.52. |
| 2C.50 | YES | N/A | N/A | I support the revisions to Section 2C.50. |
| 2C.54 | YES | N/A | N/A | I support the revisions to Section 2C.54 including removal of the SHARE THE ROAD plaque and new IN STREET and IN ROAD plaques. |
| 2C.59 | NO | YES | N/A | I support the revisions to Section 2C.59. In the new option in P2, the word "plaque" should be added after "Confirmation Advisory Speed (W13-1aP)." |
| 2C.60, 2C.64 | YES | N/A | N/A | I support the revisions to Sections 2C.60 and 2C.64. |
| 2C.66, 2C.67 | YES | N/A | N/A | I support new Sections 2C.66 and 2C.67. |
| 2C.69 | NO | YES | N/A | I generally support the revisions to Section 2C.69. However, I respectfully ask FHWA to remove "Type 2" object markers because they can be confused with delineators. Type 2 object markers have the potential to be confusing when used next to white pavement markings. |
| 2C.71 | YES | N/A | N/A | I support the revisions to Section 2C.71. |
| 2D.01 | YES | N/A | N/A | I support the revisions to Section 2D.01. |
| 2D.05 | NO | YES | N/A | I generally support the revisions to Section 2D.05. However, I have some concern about how to align Tables 2D-1 and 2D-2. The sign size is based on the classification, but the legend size is based on speed. These may or may not align. I am appreciative of the legend information in Table 2D-2 and think it will be very handy, I just anticipate that the legend sizes will result in some sign sizes that are different than are shown in Table 2D-1. |
| 2D.07 | NO | YES | N/A | I support new Section 2D.07. |
| 2D.08, 2D.09, 2D.11, 2D.12, 2D.16, 2D.17, 2D.29, 2D.34, 2D.35, 2D.36 | YES | N/A | N/A | I support the revisions to Sections 2D.08, 2D.09, 2D.11, 2D.12, 2D.16, 2D.17, 2D.29, 2D.34, 2D.35 and 2C.36. |
| 2D.37 | NO | YES | N/A | I support this new Section 2D.37. I appreciate the addition of this new tool and respectfully ask that FHWA consistently use the same terminology, either "Diverging Diamond Interchange" or "Transposed-alignment diamond interchange" in Sections 2D.37, 2D.49, and 3B.31 and in Figure 2D-22. I note that Figure 2D-23 is for a different interchange and that there is no Figure 3B-29. I respectfully request that FHWA clean up those figure references in the appropriate sections. |
| 2D.39, 2D.40 | YES | N/A | N/A | I support the revisions to Sections 2D.39 and 2D.40. |
| 2D.41 | YES | N/A | N/A | I support new Section 2D.41. |
| 2D.45, 2D.46, 2D.47 | YES | N/A | N/A | I support the revisions to Sections 2D.45, 2D.46 and 2D.47. |
| 2D.49 | NO | YES | N/A | I support the revisions to Section 2D.49. I appreciate new Figures 2D-22 and 2D-23.  In Figure 2D-22, I see the post mounted signs being used on an interchange with only one approach lane. I will appreciate an example of overhead signs for multi-lane approaches.  In Figure 2D-23, the figure has a different look and feel than Figures 2D-16 through 2D-22. The overhead guide signs also seem somewhat inconsistent with the guide signs shown in the earlier figures. I respectfully ask FHWA to revise the Figure to be consistent with Figures 2D-16 through 2D-22.  I respectfully ask that FHWA consistently use the same terminology, either "Diverging Diamond Interchange" or "Transposed-alignment diamond interchange" in Sections 2D.37, 2D.49, and 3B.31 and in Figure 2D-22. I note that Figure 2D-23 is for SPUI rather than transposed alignment and the title should be corrected in the text. |
| 2D.51 | NO | YES | N/A | I support the revisions to Section 2D.51. On Figure 2D-24, the text allowing the R13-1 sign to have a black background and white legend should be removed if the revisions to Section 2B.67 stand. |
| 2D.52 | NO | YES | N/A | I support the revisions to Section 2D.52. I would like to see an example of how the Crossover signs should be used in plan view. |
| 2D.53 | NO | YES | N/A | I generally support the revisions to Section 2D.53. I agree with the definition of a Truck Lane in P1. I have some concern with the definition of a passing lane in P3 however. On many two-lane highways, the added pavement is added to the right and are not limited only to trucks. Many states do not have an alternating center lane as shown in Figure 2D-28. Therefore, I respectfully ask FHWA to delete the phrase "left-hand" from P4. |
| 2D.54 | NO | YES | N/A | I generally support the revisions to Section 2D.54. I note that the distinction between Emergency Turn-out and Slow Vehicle Turn-out is somewhat subtle. I appreciate the inclusion of Figure 2D-30 and would like to see an additional figure for Slow Vehicle Turn-outs, particularly one that shows the pavement markings used for a Slow Vehicle Turn-out. |
| 2D.55, 2D.56, 2D.57 | YES | N/A | N/A | I support the revisions to Sections 2D.55, 2D.56, and 2D.57. |
| 2D.58 | YES | N/A | N/A | I support new Section 2D.58. |
| 2D.59 | NO | YES | N/A | I support new Section 2D.59. In one part of Idaho an Interstate highway is frequently detoured due to low or non-existent visibility because of blowing dust. As a result, there are permanently posted detour signs. I would like to see guidance for this type of situation as well. |
| Chapter 2E | YES | N/A | N/A | I support the introduction of subchapters and the reorganization of sections. |
| 2E.01, 2E.06, 2E.07, 2E.08 | YES | N/A | N/A | I support the revisions to Sections 2E.01, 2E.06, 2E.07, and 2E.08. |
| 2E.11 | NO | YES | N/A | I support the revisions to Section 2E.11. However, I am interested in additional information to differentiate Major B from Intermediate interchange classifications. The differentiation is often tricky, particularly where a Major B interchange is interspersed between Intermediate Interchanges. In that situation, I typically just sign the interchange that is likely a Major B interchange as an Intermediate Interchange for consistency within the corridor. |
| 2E.12 | NO | YES | N/A | I support the revisions to Section 2E.12. States where I am licensed to practice engineering do not use or regularly use Clearview font. I prefer to use the standard highway fonts but do not have strong opinion opposing use of the Clearview font. |
| 2E.14 | NO | YES | N/A | I generally support the revisions to Section 2E.14. However, sign fabrication staff prefers to keep only a few pre-cut border widths in stock and the new guidance potentially adds a few new widths to the inventory. As a result, agencies may not implement the full range of border widths allowed in the proposed text. |
| 2E.15 | NO | YES | N/A | I support the revisions to Section 2E.15 and appreciate the new support text regarding use of a community name or intersecting street. This is a helpful addition. |
| 2E.16, 2E.17 | YES | N/A | N/A | I support the revisions to Sections 2E.16 and 2E.17. |
| 2E.18 | NO | YES | N/A | I generally support the revisions to Section 2E.18. However I would like to see the new Standard regarding directional arrows on post-mounted Exit Direction signs be changed to allow the arrow to be either on the side of the sign in the exit direction or centered under the legend. |
| 2E.20, 2E.21, 2E.22, 2E.23 | YES | N/A | N/A | I support the revisions to Sections 2E.20, 2E.21, 2E.22 and 2E.23. |
| 2E.24 | NO | YES | N/A | I support the revisions to Section 2E.24. However, the reference to P3 in P3 seems out of place. |
| 2E.25 | NO | YES | N/A | I support the revisions to Section 2E.25. I appreciate inclusion of new Figure 2E-14. |
| 2E.26 | NO | YES | N/A | I generally support the revisions to Section 2E.26.  I respectfully ask FHWA to show the E5-1c sign on Figure 2E-15.  Where Exit Gore signs are frequently knocked over by errant vehicles, I have seen some agencies have success installing green retroreflective sheeting on the sign post(s) similar to the instruction in Section 2A.11. I respectfully ask FHWA to add this practice as an option in addition to or instead of using Type 1 object markers beneath the Exit Direction sign. |
| 2E.27 | YES | N/A | N/A | I support the revisions to Section 2E.27. |
| 2E.28 | NO | YES | N/A | I generally support the revisions to Section 2E.28.  I appreciate inclusion of new Figure 2E-20 as this is a helpful new Figure. However, the Advance Guide signs and Exit Direction sign mix city names and street names which, according to Section 2E.15, is to "be avoided." I respectfully ask FHWA to alter the legend on these signs to implement the guidance in Section 2E.15.  In the last sentence of the last Guidance statement, I respectfully ask FHWA to change the word "dropped" to "terminated" for consistency with Figure 2E-23 and to better convey the situation. The lane mentioned in this sentence is not "dropped" as defined in Part 1. |
| 2E.29, 2E.31, 2E.32, 2E.33, 2E.34, 2E.35, 2E.37 | YES | N/A | N/A | I support the revisions to Sections 2E.29, 2E.31, 2E.32, 2E.33, 2E.34, 2E.35, and 2E.37. |
| 2E.36, 2E.38 | YES | N/A | N/A | I support new Sections 2E.36 and 2E.38. |
| 2E.40 | NO | YES | N/A | I generally support the revisions to Section 2E.40. However, I think it unlikely that agencies will design the Overhead Arrow-per-lane guide signs as shown and will likely mirror the arrows shown to better represent the highway geometry. I think I understand that the I-295 arrows are shown as straight to indicate that it is the through movement, but think it better to represent the actual geometry. Therefore, I respectfully ask FHWA to revert to the signs shown on Figure 2E-5 from the 2009 MUTCD. |
| 2E.41 | NO | YES | N/A | I support the alternate proposal to delete Section 2E.41 in its entirety.  If the section is retained, then I supports the revisions to Section 2E.41. |
| 2E.42 | NO | YES | N/A | I support the revisions to Section 2E.42. I appreciate the inclusion of the new "modified Overhead Arrow-per-Lane" guide signs" and look forward to implementing this new tool.  On Figures 2E-47 and 2E-49 the Advance Guide signs and Exit Direction sign a mix city name and street name which, according to Section 2E.15, is to "be avoided." I respectfully ask FHWA to alter the legend on these signs to implement the guidance in Section 2E.15. |
| 2E.43 | NO | YES | N/A | I support the revisions to Section 2E.43. I appreciate the new Figure 2E-50 showing examples of sign spreading. The 2009 MUTCD figure was helpful and this new figure is further improvement in that it shows an example. This section could be moved to earlier in Chapter 2E. |
| 2E.45 | NO | YES | N/A | I support the revisions to Section 2E.45. However, I would like to see the figure showing the Next Exit Plaques show the plaque used beneath the Advance guide sign as described in the text. |
| 2E.48, 2E.49 | YES | N/A | N/A | I support new Sections 2E.48 and 2E.49. |
| 2E.50 | YES | N/A | N/A | I support the revisions to Section 2E.50. |
| 2E.51 | NO | YES | N/A | I generally support the revisions to Section 2E.51. On Figure 2E-58 the Advance Guide signs and Exit Direction sign a mix city names and a street name which, according to Section 2E.15, is to "be avoided." I respectfully ask FHWA to alter the legend on these signs to implement the guidance in Section 2E.15. |
| 2E.52 | NO | YES | N/A | I generally support the revisions to Section 2E.52. On Figure 2E-60 the Advance Guide signs and Exit Direction sign a mix city names and a street name which, according to Section 2E.15, is to "be avoided." I respectfully ask FHWA to alter the legend on these signs to implement the guidance in Section 2E.15.  Further, I think "EAST" should be removed from the EXIT 147A Exit Direction sign. |
| 2E.53 | NO | YES | N/A | I support the revisions to Section 2E.53. On Figure 2E-61, the text allowing the R13-1 sign to have a black background and white legend should be removed if the revisions to Section 2B.67 stand.  I also respectfully ask FHWA to change the title of the section to correlate with Section 2B.67. |
| 2E.54, 2E.55, 2E.57 | YES | N/A | N/A | I support the revisions to Sections 2E.54, 2E.55, and 2E.57. |
| 2E.56 | YES | N/A | N/A | I support new Section 2E.56. |
| 2H.01, 2H.02 | YES | N/A | N/A | I support the revisions to Sections 2H.01 and 2H.02. |
| 2H.03, 2H.04, 2H.05, 2H.06, 2H.07 | YES | N/A | N/A | I support new Sections 2H.03, 2H.04, 2H.05, 2H.06, and 2H.07. |
| 2H.08 | NO | YES | N/A | I do not see a need to add Section 2H.08 and the associated signs to the MUTCD, but I do not necessarily oppose their inclusion. |
| 2H.09 | NO | NO | YES | I do not support the idea of providing Project Information signs. The information on the proposed sign is not consistent with traffic control devices and should be conveyed through means other than signs. I suspect inclusion of new Section 2H.09 will legitimize the use of Project Information signs that will result in proliferation of the signs. I respectfully asks FHWA to omit this section. |
| 2H.10 | NO | YES | N/A | I support new Section 2H.10 and appreciate guidance on these signs. However, these signs are similar to D3-1 signs and it seems that the section can be combined with Section 2D.45 – Street Name Signs. I respectfully ask FHWA to consider combining with Section 2D.45. Further, I respectfully ask FHWA to ensure the sign numbers used in the text and used in the figure match. |
| 2H.11, 2H.12, 2H.13 | YES | N/A | N/A | I support the revisions to Sections 2H.11, 2H.12, and 2H.13. |
| 2H.14 | NO | NO | YES | I generally think the new Alternative Fuels Corridor sign is unnecessary as drivers of alternative fuel vehicles will often have their fueling stops planned, will have a method for finding alternative fuel locations, or their vehicles will assist in navigation to those alternative fuels. Signing for Alternative Fuel Corridors conflicts with the principles in Section 2A.19. |
| Relocated 2H.07 | YES | N/A | N/A | I support relocation of the content of this section. The new location makes more sense. |
| Chapter 2I | NO | YES | N/A | I generally do not support use of General Service signs and would like to see General Service signs limited to a few critical services such as hospitals, airports, and ferries. In this age of navigational devices and smart devices use of general service signs seem extraneous and in conflict with the principles in Section 2A.19. |
| 2I.02 | NO | YES | N/A | I agree with the principles in support P1 and note that the remaining two pages of text and accompanying figures conflict with P1 and Sections 2A.01 and 2A.19. Therefore, I respectfully ask FHWA to revise the section to align with P1 and Section 2A.19. |
| 2I.03 | NO | YES | N/A | I would like to see a paragraph similar to P1 from Section 2I.02 repeated in this section for Freeways and Expressways. My comments made for Section 2I.02 also apply here.  Often services adjacent to freeways and expressways are advertised with tall signs that can be seen for some distance from the interchange. Further, I would like to see P1 of Section 2I.03 changed to a guidance statement and reworded as follows: “General Service (D9-18 series) signs (see Figure 2I-3) should not be used at major interchanges (see definition in Section 2E.11) and in urban areas.  Further, it appears that the D9-18b and D9-18c signs with exit numbers can be deleted. |
| 2I.04 | NO | YES | N/A | The term “Interstate Oasis” is generally not understood by highway users and I respectfully ask FHWA to reconsider use of this concept. |
| 2I.08, 2I.09 | YES | N/A | N/A | I support the revisions to Sections 2I.08 and 2I.09. |
| 2I.10, 2I.11 | NO | NO | YES | I disagree with inclusion of Sections 2I.10 and 2I.11 in the MUTCD. Use of the signs is inconsistent with the principles in section 2A.19.  In the case of Channel 9 monitored, the sign applies only to a segment of the highway users.  Emergency call numbers are well known at this point and should not be signed. Other numbers for reporting drunk drivers or forest fires should also not be used on signs. These services are also available through 911. |
| 2I.12, 2I.13 | YES | N/A | N/A | I support the revisions to Sections 2I.12 and 2I.13. |
| 2I.14 | NO | NO | YES | I disagree with inclusion of Section 2I.14 in the MUTCD. The D12-2 sign is advertising a service and can be better communicated through other means such as advertising, social media, and press releases. Use of such signs is inconsistent with the principles in section 2A.19. |
| 2I.15 | YES | N/A | N/A | I support the addition of new Section 2I.15. |
| Chapter 2J | NO | YES | N/A | I support replacement of “logo” with “business identification” signs. However, like in Chapter 2I, I generally do not support use of Specific Service signs and would like to see Specific Service signs removed from the Manual. In this age of navigational devices and smart devices use of Specific Service signs seem extraneous and in conflict with the principles in Section 2A.19. |
| 2J.01 | NO | YES | N/A | I support deletion of 24-hour pharmacy from Section 2J.01. I would like to see the attractions category deleted as well since it is vague and not well defined. In general, I would like to see a paragraph added similar to P1 from Section 2I.02 that indicates specific service signs should not be used if the service is visible to highway users. My comments for Sections 2I.02 and 2I.03 are generally applicable to this section as well. |
| 2J.02 | NO | YES | N/A | As indicated in my previous comments, I generally do not agree with use of “business identification” signs. However, if retained, I support deletion of the 24-hour pharmacy category and ask that FHWA also delete the “attraction” category. I support the concept that specific service signs are intended for rural areas and ask FHWA to move that concept to the beginning of Section 2J.01. |
| 2J.03, 2J.04, 2J.05 | YES | N/A | N/A | I generally support the revisions to Sections 2J.03, 2J.04, and 2J.05. |
| 2J.06 | NO | YES | N/A | Figure 2J-2 should be placed in Section 2J.06.  The spacing presented in the section and on Figure 2J-2 can be problematic. In Figure 2J-2 more emphasis is placed on the business identification signs than on the advance guide signs. Only one advance guide sign is used which is appropriate for a Minor interchange, but not an interchange that has four business identification signs. The 800 foot spacing from advance guide signs can seem very close. The 100 foot and 200 foot spacing of Specific Service signs on ramps is extraordinarily close and I ask FHWA to change this guidance to more generous spacing such as 500 feet. If the longer spacing cannot be achieved, then fewer or no business identification signs should be used. |

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| 2J.07, 2J.08, 2J.09, 2J.10, 2J.11 | NO | NO | YES | As I’ve previously commented, I do not support use of Specific Service signs. To that end, I generally do not support the previsions of Sections 2J.07, 2J.08, 2J.09, 2J.10, and 2J.11. |
| 2J.12 | NO | YES | N/A | I support the content of Section 2J.12 and respectfully ask FHWA to move the section to nearer the beginning of Chapter 2J. |
| Chapter 2K | NO | YES | N/A | Like in Chapters 2I and 2J, I generally do not support use of Tourist-Oriented Directional signs and would like to see the signs removed from the Manual. In this age of navigational devices and smart devices use of Tourist-Oriented Directional signs seem extraneous and in conflict with the principles in Section 2A.19. |
| 2K.01 | NO | YES | N/A | I support FHWA limiting use of Tourist-Oriented Directional signs to rural highways. However, in general, I would like to see a paragraph added similar to P1 from Section 2I.02 that indicates specific service signs should not be used if the service is visible to highway users. My comments for Sections 2I.02 and 2I.03 are generally applicable to this section as well. |
| 2K.02 | NO | YES | N/A | If Tourist-Oriented Direction signs are retained in the Manual, then I generally support the revisions to Section 2K.02. I respectfully ask FHWA to include a Figure with an example of white on brown cultural interest symbols on a TODS panel.  I also respectfully ask FHWA to add a new guidance statement as follows:  "The symbol, if used, should be directly related to the primary service in which the facility is eligible for a tourist-oriented directional sign."  In Figures 2K-1 and 2K-2, a symbol is shown to the right of the word legend which conflicts with the last sentence of P3. I respectfully ask FHWA to revise Figures 2K-1 and 2K-2 to match the guidance in P3. |
| 2K.04 | YES | N/A | N/A | I support the revisions to Section 2K.04. |
| 2K.07 | NO | YES | N/A | Like Section 2J.12, I support the content of Section 2K.07 and respectfully ask FHWA to move the section to nearer the beginning of Chapter 2K. |
| 2L.01 | YES | N/A | N/A | I support the revisions to Section 2L.01 |
| 2L.02 | NO | YES | N/A | I support the revisions to Section 2L.02 as the revisions generally concur with resolutions from AASHTO and the NCUTCD. I support the guidance on AMBER alerts and to keep traffic safety campaign messages simple, direct, and to avoid popular culture references. I also support the limitation on traffic safety campaign messages unless they are part of an active, coordinated safety campaign. I support the standard and guidance regarding homeland security and emergency messages. |
| 2L.03, 2L.04, 2L.05 | YES | N/A | N/A | I support the revisions to Sections 2L.03, 2L.04, and 2L.05. |
| 2L.06 | NO | YES | N/A | I generally support the new Section 2L.06 as it describes general traffic engineering principles. However, as written the section is subjective. I respectfully ask FHWA to better define "frequency" as described in the section. |
| 2L.07, 2L.08 | YES | N/A | N/A | I support new Sections 2L.07 and 2L.08. |
| 2L.09 | NO | YES | N/A | I support the revisions to Section 2L.09. The reference to "Section 6F.60" at the end of the section should be to "Section 6L.05." |

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| 2M.02, 2M.04, 2M.06, 2M.07, 2M.08, 2M.09 | YES | N/A | N/A | I support the revisions to Sections 2M.02, 2M.04, 2M.06, 2M.07, 2M.08, and 2M.09. |
| 2M.10 | NO | YES | N/A | My experience has shown that Memorial or Dedication signing is an emotional topic and that those wanting to memorialize a highway or bridge don’t care about traffic control device rules nor about the cost or maintenance of such signs. The requested signs become statues with unveiling ceremonies and speeches from dignitaries rather than traffic control devices. I disagree with memorial highways being treated this way, but this is what I observe.  I agree with the addition of P3 regarding excessive use of signs. I think the reference to Section 2A.03 should be to Section 2A.19.  I understand the sentiment that memorial or dedication signs are not traffic control devices, but rather a statue. However, I do think it important for the MUTCD to provide some guiding information and I support the content of the section. |
| Chapter 2N | YES | N/A | N/A | I support the sign renumbering in Chapter 2N. |
| 2N.02, 2N.03, 2N.04, 2N.05 | YES | N/A | N/A | I support the revisions to Sections 2N.02, 2N.03, 2N.04, and 2N.05. |
| Part 3 | YES | N/A | N/A | I support the reorganization of Part 3 to improve the continuity and flow of information regarding the application of markings in the MUTCD. I support the relocation of various paragraphs and sections, dividing long sections into several sections each having a clearly understandable title and function, and creating a new Chapter 3C Crosswalks. |
| 3A.01 | YES | N/A | N/A | I support the revisions to Section 3A.01. |

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| 3A.02 | NO | YES | N/A | I agree with changing existing Paragraph 2 from Support to Option. The use of clumps or droplets of material is appropriate as an Option. I concur with relocating existing Paragraph 5 to Section 3G.04 (existing Section 3F.04) because it describes delineator placement. |
| 3A.03 | YES | N/A | N/A | I support the revisions to Section 3A.03. |
| 3A.04 | NO | YES | N/A | I support revisions to Section 3A.04 regarding the widths of normal and wide lines. I look forward to implementing the 10 inch wide line whereas right now practicioners must use a 12 inch wide line when 6 inch normal lines are used. If nothing else, I support FHWA in implementing the proposed changes to the width of wide lines.  I encourage FHWA to keep the width of wide lines tied to the width of normal lines. I do not support use of more than one width of normal lines for edge lines and lane lines. Such a practice has the potential to degrade the meaning of both normal and wide lines by essentially adding a third width of line.  Regarding the application of dotted line pavement markings, I find conflict between 3A.04 and 3B.07. In the situation displayed on Figure 3B-13 sheet 2 of 2, it is my interpretation that the dotted line markings that extend through the intersection should be 2 foot line segments with 2- to 6- foot gaps. It is also my understanding that the dotted lines used at the openings to exclusive left turn and right turn lanes should be 3 foot line segments with 9 foot gaps.  The last paragraph of Section 3A.04 seems to indicate that each of the dotted lines on Figure 3B-13 sheet 2 of 2 should use a 2 foot line segment with 2- to 6-foot gap as the markings are "within an intersection" or in a "taper area" (ie. the gap at the opening of exclusive left turn or right turn lanes). However, the last guidance paragraph in Section 3B.07 appears to indicate that dotted lines with 3 foot line segments and 9 foot gaps should be used at the openings for exclusive left turn and right turn lanes because the line is "a lane line separating through lanes from auxiliary lanes." I interpret this to be different guidance for the same situation.  I respectfully ask FHWA to describe dotted line applications in one section, or at least one chapter, rather than in different sections and chapters. I prefer to see the application information contained in Chapter 3B. Further, I respectfully ask FHWA to use clear and consistent terminology to describe the situations where the two different dotted line patterns apply. Please also see my comment for Section 3B.07. |
| 3B.01, 3B.03, 3B.04 | YES | N/A | N/A | I support the revisions to Sections 3B.01, 3B.03, and 3B.04. |
| 3B.02 | YES | N/A | N/A | I support new Section 3B.02. |

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| 3B.05 | NO | YES | N/A | I appreciate that the proposal to terminate two-way left turn lane markings prior to intersections has the potential to reduce conflicts between left-turning movements and has the potential to discourage use of two-way left turn lanes to make two stage turns from minor roads. However, I also have concern with the guidance.  Many existing roads and highways have pavement markings up to intersections and it will take some time to change those markings. Further, transitions to exclusive left turn lanes will require use of arrow pavement markings that are not currently used.  Use of the rounded yellow markings and recommended yellow diagonal markings are difficult to maintain. Lines that are not parallel with the direction of travel take additional time and effort and cause additional exposure for maintenance crews.  For these reasons, I respectfully ask FHWA to carefully consider the implications of terminating two-way left turn lane markings prior to intersections. |
| 3B.06 | NO | YES | N/A | I generally concur with the revisions to Section 3B.06. However, I respectfully ask FHWA to clarify and potentially reword P9.  As written, I question the need for the sentence. If the sentence means that intersecting lines may be filleted, then I question whether the sentence is necessary and note that a similar clause does not exist in Section 3B.01, even though curved transitions can also be used for yellow lines. If it means something else, then I request FHWA to clarify the sentence.  P3.A contains the word "all." As a note of commentary, the word "all" is usually unnecessary and can be deleted. Use of the word "all" doesn't enhance the meaning and it's absence does not lessen the meaning of the sentence. I respectfully ask FHWA to delete "all" from the Guidance sentence and throughout the Manual as appropriate.  The dotted line across the option lane on Figure 3B-10, sheets 2 of 6 and 5 of 6 appears to be a wide line, but with a note indicating normal width. I respectfully ask FHWA to make the line widths clearer on these figures.  Figure 3B-13 appears to be missing Sheet 1 of 2. I respectfully ask FHWA to correct this figure. |

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| 3B.07 | NO | YES | N/A | Regarding the application of dotted line pavement markings, I find conflict between 3A.04 and 3B.07. In the situation displayed on Figure 3B-13 sheet 2 of 2, it is my interpretation that the dotted line markings that extend through the intersection should be 2 foot line segments with 2- to 6- foot gaps. It is also my understanding that the dotted lines used at the openings to exclusive left turn and right turn lanes should be 3 foot line segments with 9 foot gaps.  The last paragraph of Section 3A.04 seems to indicate that each of the dotted lines on Figure 3B-13 sheet 2 of 2 should use a 2 foot line segment with 2- to 6-foot gap as the markings are "within an intersection" or in a "taper area" (ie. the gap at the opening of exclusive left turn or right turn lanes). However, the last guidance paragraph in Section 3B.07 appears to indicate that dotted lines with 3 foot line segments and 9 foot gaps should be used at the openings for exclusive left turn and right turn lanes because the line is "a lane line separating through lanes from auxiliary lanes." I interpret this to be different guidance for the same situation.  I respectfully ask FHWA to describe dotted line applications in one section, or at least one chapter, rather than in different sections and chapters. Further, I respectfully ask FHWA to use clear and consistent terminology to describe the situations where the two different dotted line patterns apply. Please also see my comment for Section 3A.04. |
| 3B.08 | NO | YES | N/A | I generally support the revisions to Section 3B.08. On line 38 on page 308 of 697 of the clean version, I think "entrance and entrance" should be changed to "entrance and exit." |
| 3B.09 | NO | YES | N/A | I generally support the revisions to Section 3B.09. However, in P2 I think the text should also reference P3 and P7. Therefore, I respectfully ask FHWA to revise P2 as follows:  "Except as provided in Paragraph 3 and Paragraph 7, and in Paragraph 9 of Section 3E.04…”  P4 is modified by P7 (wide solid edge lines may be used). I therefore respectfully ask FHWA to revise the beginning of P4 as follows: "Except as provided in paragraph 7, if edge lines are used on the roadways…” |
| 3B.11 | NO | YES | N/A | I generally support the revisions made to Section 3B.11. I support moving the Standard to Guidance.  I do not support deletion of the option stating that a normal line may be used to extend a wide line and respectfully ask FHWA to retain this option. Deletion of the option removes the opportunity to extend a wide line with a normal width line. |
| 3B.12 | NO | YES | N/A | I generally support the revisions to Section 3B.12. However, I identify inconsistencies in the lane reduction markings and signs shown on Figures 2C-13 and 3B-14. I respectfully ask FHWA to revise Section 3B.12 and Figure 3B-14 to correlate with Figure 2C-13.  Further, in P6.B, I respectfully ask FHWA to change “the roadway” to “roadways.”  In P9, the last guidance statement is redundant since S defined in P7 as the higher of posted/statutory and 85th-percentile (i.e. observed) speed. Further, if the observed speeds exceed speed limits, then the speed limits have not been set in accordance with Section 2B.21. |
| 3B.13 | YES | N/A | N/A | I support the revisions to Section 3B.13. |
| 3B.15 | NO | YES | N/A | In P2 , the word “otherwise” is unnecessary. I respectfully ask FHWA to delete "otherwise" so the sentence will read “Except as provided in…” |
| 3B.17, 3B.18 | YES | N/A | N/A | I support the revisions to Sections 3B.17 and 3B.18. |
| Deleted 3B.15 | YES | N/A | N/A | I support the deletion of Section 3B.15 as transverse markings are already defined in Part 1. |
| 3B.19 | NO | YES | N/A | I support the change from Option to Standard which clarifies ambiguity in the previous Option statement. |
| 3B.20 | NO | YES | N/A | I generally support the revisions to Section 3B.19. However, in P5, I think "Section 3B" should be "Section 3B.26." I also ask FHWA to revise the reference to the Standard Highway Signs book to be consistent throughout the Manual. |
| 3B.21 | NO | YES | N/A | I generally support the revisions to Section 3B.21. However, I understand that adjustments can be made to letters and numerals as described in P7 and P9 of Section 3B.20. I respectfully ask FHWA to either repeat the information about making adjustments or to refer to that information from Section 3B.20. |
| 3B.22 | YES | N/A | N/A | I support new Section 3B.22. |
| 3B.23 | NO | YES | N/A | I generally support the revisions to Section 3B.23. However, in P5 I am not sure that Figure 2B-11 is the corrected cross reference. I respectfully ask FHWA to check this reference and to correct it if necessary.  I question whether note 2 on Figure 3B-21 should be deleted and replaced with a reference to Section 3B.20. The text in P7 and P9 appears to conflict with note 2. I respectfully ask FHWA to investigate and resolve this conflict. |
| 3B.24 | NO | YES | N/A | I generally support the revisions to Section 3B.24. I note that the cross references to Figures 2B-12 and 2B-13A should be 2B-19 and 2B-20A. |
| 3B.25 | NO | YES | N/A | I generally support the revisions to Section 3B.25. However, I do not support guidance that "Chevron markings should be used" in the neutral area of exit and entrance ramps. I respectfully ask FHWA to make this an Option. Chevron markings are difficult to maintain and expose maintenance workers to hazards.  I note that the Standard in P9 and the Guidance in P11 may conflict.  The statements that diagonal markings “shall be yellow when used on the left-hand shoulders” but that diagonal markings “used in on-street no-parking zones should be white” are contradictory when there are no-parking zones on the left side of one-way streets. I respectfully ask FHWA to resolve this conflict. |
| 3B.27, 3B.28, 3B.29 | YES | N/A | N/A | I support the revisions to Sections 3B.27, 3B.28, and 3B.29. |
| Deleted 3B.21 | YES | N/A | N/A | I support the deletion of Section 3B.21. |
| 3B.31 | NO | YES | N/A | I support new Section 3B.31. I appreciate specific information on this type of interchange. I support use of the various terminology used to describe the interchange, such as "Diamond Interchange with Transposed Alignment Crossroad," "Transposed Alignment Crossroad Diamond Interchange," or the common "Diverging Diamond Interchange" terminology and respectfully ask that FHWA be consistent in whatever term is used throughout the Manual.  I note that Figure 3B-29 does not appear to be included in the NPA, therefore I cannot comment on the figure. |
| 3C.01, 3C.02 | YES | N/A | N/A | I support the revisions to Sections 3C.01 and 3C.02. |
| 3C.03 | NO | YES | N/A | I generally support the revisions to Section 3C.03. However, I respectfully ask FHWA to delete the new standard in P6 be changed to an option or be deleted. The minimum width of crosswalks should not be dependent on the location of the crosswalk. |
| 3C.04 | NO | YES | N/A | I support the addition of new Section 3C.04 and generally support the content. However, P1 reads like a Standard with the phrase "are limited to." I respectfully ask that the first support sentence be refined and reworded to not read like a Standard. |
| 3C.05 | NO | YES | N/A | I support the addition of new Section 3C.05 and generally support the content. However, P2 reads like a Standard with the phrase "are limited to." I respectfully request that the first support sentence be refined and reworded to not read like a Standard. |
| 3C.06, 3C.07, 3C.08 | NO | YES | N/A | I support the addition of new Sections 3C.06, 3C.07, and 3C.08 and generally support the content. However, some agencies have used a "modified continental" or modified longitudinal crosswalk pattern that consists of 24 inch wide longitudinal bars that are 36 inches long, then a 24 inch gap, then another 36" longitudinal bar. The reason given for using this modified pattern is to ensure traction for pedestrians through the crosswalk because the longitudinal markings are perceived to become slippery in wet conditions. I respectfully ask FHWA to consider adding an option to Section 3C.06 as follows:  "Option:  A gap may be provided in the longitudinal bars to provide a path through the crosswalk where pedestrians can traverse on unmarked pavement.  Support:  Some pavement marking materials can become slippery in wet conditions." |
| 3C.10 | YES | N/A | N/A | I support new Section 3C.10 |
| 3C.11 | NO | YES | N/A | I support new Section 3C.11. I appreciate specific information on this type of interchange. I support use of the various terminology used to describe the interchange, such as "Diamond Interchange with Transposed Alignment Crossroad," "Transposed Alignment Crossroad Diamond Interchange," or the common "Diverging Diamond Interchange" terminology and respectfully ask that FHWA be consistent in whatever term is used throughout the Manual.  I note that Figure 3B-29 does not appear to be included in the NPA, therefore I cannot comment on the figure. |
| Chapter 3D | NO | YES | N/A | I generally support the revisions made throughout Chapter 3D. However, I think the MUTCD should present general principles about pavement markings and that references specific to intersection or interchange types should be covered in reference documents specific to those intersection or interchange types. In this case, I prefer to see the Roundabout Information Guide contain the figures and information currently in Chapter 3D. I encourage FHWA to work with Transportation Research Board to move this content to the next edition of the Roundabout Information Guide and to remove Chapter 3D. |
| Chapter 3E | YES | N/A | N/A | I support the content in Chapter 3E. |
| Chapter 3F | YES | N/A | N/A | I support the content in Chapter 3F. |

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| 3G.03 | NO | YES | N/A | I generally support the revisions to Section 3G.03. However, I think the addition of "with pavement markings" to P7 makes the paragraph confusing. It is unclear how the median crossover is to be marked "with pavement markings." I understand the delineators to be the method to mark the median crossover and respectfully ask FHWA delete the proposed "with pavement markings" text from P7. |
| 3H.01 | YES | N/A | N/A | I support the revisions to Section 3H.01 and the proposed standardization of colored pavement. |
| 3H.02, 3H.04, 3H.05 | YES | N/A | N/A | I support new Sections 3H.02, 3H.04, and 3H.05. |
| 3H.03 | YES | N/A | N/A | I support the revisions to Section 3H.03. |
| 3H.06, 3H.07, 3H.08 | NO | YES | N/A | I cautiously support new Sections 3H.06, 3H.07, and 3H.08. I have general concerns about additional pavement marking colors, storage and application of new pavement marking colors, and maintenance of these colored pavement markings. I recognize that many agencies are anxiously applying these new pavement marking colors through Interim Approvals, but other agencies are less excited about implementation, will prefer not to use the colored pavement markings, but will be pressured to provide the markings by insistent road users. |
| 3I.01 | NO | YES | N/A | I generally support the revisions to Section 3I.01. However, I do not support the addition of a new option in P5 or support statement in P6. These describe temporary traffic control situations that are already described in Part 6. |
| 3I.02 | YES | N/A | N/A | I support new Section 3I.02. |
| Chapter 3J | YES | N/A | N/A | I support the revisions to the Chapter name and organization. |
| 3J.02 | YES | N/A | N/A | I support the revisions to Section 3J.02. |
| 3J.03, 3J.04, 3J.05 | YES | N/A | N/A | I support new Sections 3J.03, 3J.04, and 3J.05. |
| 3J.07 | NO | YES | N/A | I generally support addition of new Section 3J.07. I recognize some advantages to using pavement markings to create curb extensions that retain the pavement width for when it is needed by large loads. |
| Delete 3I.03 | YES | N/A | N/A | I support deletion of Section 3I.03. |
| Part 4 (NPA item 382) | YES | N/A | N/A | I support the reorganization and creation of new sections in Part 4. |
| NPA item 383 | NO | YES | N/A | I support the addition of three-section signal faces using FYA signal indication in the same section as the steady yellow. I also support the proposed addition in 4F.02, 4F.09 and 4F.16 for the option of displaying both the FYA and steady yellow arrow in the same section for five section shared left/right signal faces. |
| 4A.03 | NO | YES | N/A | I generally support Section 4A.03. However, I respectfully ask FHWA to delete the second paragraph of C.2. Using a separate traffic control device to change the meaning of the RED ARROW signal indication marginalizes the meaning of the RED ARROW. Please see my comment for Section 2B.61. |
| 4A.05 | NO | YES | N/A | I support new Section 4A.05. I respectfully ask FHWA to correct the reference to Bicycle Signal (RX-XX) sign in P1.C. |
| 4A.06 | NO | YES | N/A | I generally support the revisions to Section 4A.06. I respectfully ask FHWA to change “safety island” to “pedestrian refuge island” for consistency with other sections in the MUTCD. |

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| 4A.08 | NO | YES | N/A | I support the revisions to Section 4A.08. However, I note that the change to “highway traffic signal” in P2, P4, and P6 is not used consistently throughout Part 4. For example, Section 4A.01 still uses “traffic control signals” in P1. |
| 4B.02 | YES | N/A | N/A | I support the proposed revisions to Section 4B.02. |
| Deleted 4B.05 | YES | N/A | N/A | I support the deletion of Section 4B.05. |
| 4B.05 | YES | N/A | N/A | I support the proposed revisions to Section 4B.05. |
| 4C.01, 4C.02, 4C.03, 4C.04, 4C.05, 4C.06, 4C.07, 4C.08, 4C.09, 4C.10 | YES | N/A | N/A | I support the proposed revisions to Sections 4C.01 through 4C.10. |
| 4D.01 | YES | N/A | N/A | I support the proposed revisions to Section 4D.01. |
| 4D.02 | NO | YES | N/A | I support the proposed revisions to Section 4D.02 including the change in guidance for accessible pedestrian signals that their use should be based on an engineering study for consistency with Section 4K.01. |
| 4D.03, 4D.05, 4D.06, 4D.07, 4D.08, 4D.09, 4D.10, | YES | N/A | N/A | I support the proposed revisions to Sections 4D.03, 4D.05, 4D.06, 4D.07, 4D.08, 4D.09, and 4D.10. |
| 4E.01, 4E.02, 4E.04 | YES | N/A | N/A | I support the proposed revisions to Sections 4E.01, 4E.02, and 4E.04. |
| 4F.01 | NO | YES | N/A | I generally support the revisions to Section 4F.01. However, I respectfully ask that the standard section in 4F.01 regarding limitation on supplemental signal faces (Page 438, line 50, 51 and page 439 line 1 and 2 of the mark-up) be revised to match the proposed wording from Section 4D.06 on limitation of supplemental signal faces or perhaps just refer to Section 4D.06. |
| 4F.02 | NO | YES | N/A | I support the proposed revisions to Section 4F.02. |
| 4F.04, 4F.06, 4F.08, 4F.11, 4F.13, 4F.15 | NO | YES | N/A | I generally support new Section 4F.04. However, E from P3 should be deleted in 4F.04 under Circular Green signal indication since FYA is now allowed to be in the same section as steady yellow. The same concept applies for F in Section 4F.11. I respectfully ask FHWA to delete these subparagraphs.  Additionally, I respectfully ask FHWA to delete the second sentence of E from P5 of Section 4F.04. I do not support the idea of using a separate traffic control device to describe use of a traffic control device. If such an educational message is needed, then the traffic control device should be redesigned or discontinued. Please see my comment for Section 2B.60. |
| 4F.06, 4F.13 | YES | N/A | N/A | I support deletions from these sections. |
| 4F.08, 4F.09, 4F.15, 4F.16, 4F.19 | YES | N/A | N/A | I support the revisions to Sections 4F.08, 4F.09, 4F.15, 4F.16, and 4F.19. |
| 4F.17 | NO | NO | YES | I do not support inclusion of the recent publication “Guidelines for Determining Traffic Signal Change and Clearance Intervals: A Recommended Practice of the Institute of Transportation Engineers.” Many agencies have identified operational concerns with the new guidance and it is my understanding that further research is being planned. Until that research is completed, I respectfully ask FHWA to not reference the new ITE publication and to retain the current maximum durations for yellow change intervals. |
| 4G.02, 4G.04 | YES | N/A | N/A | I support the revisions to Sections 4G.02 and 4G.04. |
| Chapter 4H | YES | N/A | N/A | I support inclusion of new Chapter 4H. |
| 4I.01, 4I.02, 4I.03, 4I.04, 4I.05, 4I.06 | YES | N/A | N/A | I support the revisions to Sections 4I.01 through 4I.06. |
| 4J.01, 4J.03 | YES | N/A | N/A | I support the revisions to Sections 4J.01 and 4J.03. |
| 4J.02 | NO | YES | N/A | I generally support the revisions to Section 4J.02. However, I disagree that APS should be installed at all PHBs. Instead, I respectfully ask that FHWA revise the APS guidance paragraph to coordinate more closely with Section 4K.01 in that use of APS should be based on the results of an engineering study. |
| 4K.01, 4K.02 | YES | N/A | N/A | I support the revisions to Sections 4K.01 and 4K.02. |
| 4K.03 | NO | YES | N/A | I generally support the revisions to Section 4K.03. However, I do not support addition of a standard to use languages other than English. I respectfully ask FHWA to not include the new standard. |
| 4K.04, 4K.05 | YES | N/A | N/A | I support the revisions to Sections 4K.04 and 4K.05. |
| 4L.01, 4L.02, 4L.03 | YES | N/A | N/A | I support new Sections 4L.01, 4L.02, and 4L.03 and I thank FHWA for including RRFB in the new edition of the Manual. |
| 4M.03 | YES | N/A | N/A | I support the revisions to Section 4M.03. |
| 4N.03 | YES | N/A | N/A | I support the revisions to Section 4N.03. |
| 4P.02 | NO | YES | N/A | I generally support the revisions to Section 4P.02. However, I do not support revisions to P6 that will require two signal faces for each lane. I respectfully ask FHWA to retain the 2009 MUTCD text at the end of P6. |
| 4P.03 | YES | N/A | N/A | I support the revisions to Section 4P.03. |
| 4Q.02 | YES | N/A | N/A | I support the revisions to Section 4Q.02. |
| 4S.01, 4S.02, 4S.04, 4S.05, | YES | N/A | N/A | I support the revisions to Sections 4S.01, 4S.02, 4S.04, and 4S.05. |
| 4S.03 | NO | YES | N/A | I generally support the revisions to Section 4S.03. However, I disagree that audible information devices should be installed at all pedestrian-actuated Warning Beacons. Instead, I respectfully ask that FHWA revise the guidance paragraph to indicate that use of audible information devices should be based on engineering judgment. |
| 4T.01, 4T.03, 4T.04 | YES | N/A | N/A | I support the revisions to Sections 4T.01, 4T.03, and 4T.04. |
| 4U.01, 4U.02 | YES | N/A | N/A | I support the revisions to Sections 4U.01 and 4U.02. |
| Part 5 | NO | YES | N/A | I agree with the relocation of low-volume road content and introduction of the new part for automated vehicles. I generally support the comments made by the NCUTCD on Part 5.  I generally support the content in new Part 5. I respectfully ask FHWA to minimize differences between Part 5 and other parts of the MUTCD. Different applications for automated vehicles and other human users will be confusing and difficult to implement. |
| 5B.04 | NO | YES | N/A | I generally support the material in Section 5B.04 on temporary traffic control. I ask FHWA to minimize differences between Part 5 and other parts of the MUTCD.  I note that the only standards in Part 5 are in Section 5B.04 and I respectfully ask that FHWA change these standards to guidance or the support to match the rest of Part 5.  END ROAD WORK signs are optional in Part 6, but should be used here in Part 5. I respectfully ask FHWA to make the END ROAD WORK sign optional in this section to correlate with Part 6.  There also appears to be a disconnect in the level of requirement to remove conflicting pavement markings between this section and Part 6. I respectfully ask FHWA to coordinate this section and Part 6.  Finally, I note that an 8 inch minimum width for channelizing devices essentially eliminates use of cones and tubular markers and requires use of vertical panels or drums. I respectfully ask FHWA to provide additional information about the conditions where the wider channelizing devices should be used. |
| Part 6 | NO | YES | N/A | I generally agree with and support the reorganization, consolidation, and deletion of redundant material in Part 6. In addition to my comments, I respectfully ask FHWA to implement the revisions to the typical applications that have been proposed and approved by the NCUTCD in January 2021. Those revisions are included in the NCUTCD comments for Chapter 6P.  I support making editorial revisions to eliminate vague and undefined terms.  I have concerns about the implementation of 28 CFR 35.160(a) in Part 6. 28 CFR 35.160(a) is general and allows flexibility in implementation, some of the implementation in Part 6 is specific and allows little flexibility. Specifically, please see my comments for Typical Applications 28 and 29.  Further, I respectfully ask FHWA to consider creating subchapters in Part 6 as has been done in Part 2. The division of Chapter 6F into several separate chapters can be accomplished through subchapters instead. |
| 6A.01 | YES | N/A | N/A | I support the proposed revisions to Section 6A.01 that include editing the section, integrating concepts from Part 5 of the 2009 Manual, changing a Standard to Guidance, with deletion of support paragraph, and relocation of the guidance and option paragraphs. |

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| 6A.02 | NO | YES | N/A | I support the revisions to what appears to be P03.3.A and P03.3.B of Section 6A.02. The implementation of 28 CFR 35.16 (subpart a) appears to remain true to the text and intent of the CFR. In particular, I approve of the phrases, "Information should be provided in usable formats for pedestrians with visual disabilities" and "Traffic control devices should provide information in usable formats for pedestrians with visual disabilities."  I support the proposed relocations, additions, and revisions and respectfully request that FHWA make some further refinements. I agree with the new guidance text in what appears to be P03.D and request revisions. The way it is currently written implies demand exceeds capacity any time a lane is closure, which is not necessarily true for all locations or all times of day. The new text also includes "may" which implies an option that I request to be changed to "could." In the same text, there is a typo in the first sentence. I propose the following language: When the roadway capacity is reduced due to lane closures, the demand could exceed the available capacity. This could result in either a lengthy stopped or slow moving queue of vehicles that may extend past the normal signs shown in the typical advance warning area. An assessment of the expected queue length should be a part of the temporary traffic control plan design process. Adjustments to the sign spacing and number of signs as well as the possibility of using more conspicuous devices could be provided to increase the distance and conspicuity of the advance warning area. |
| 6A.03, 6A.04 | NO | YES | N/A | I support dividing Section 6F.01 into new Sections 6A.03 and 6A.04. I generally agree with the revisions made to Section 6A.03, but ask that the first Standard in P02 be deleted since it is repetitive with the definition of traffic control devices in Part 1.  Further, I ask that "pedestrian facility, bikeway, pathway..." be added to the second Standard. I agree with the revisions to Section 6A.04. |
| 6B.01 | NO | YES | N/A | I support the revisions to Section 6B.01. In particular, I support the relocation of the guidance paragraph regarding avoiding reduced speed zoning to the location prior to the further guidance regarding reduced speed limits. |
| 6B.04 | YES | N/A | N/A | I support the revisions to Section 6B.04. |
| 6B.05 | NO | YES | N/A | I generally support the revisions to Section 6B.05. I respectfully request further simplification to the proposed changes to P02. The reference to "short-term" is inappropriate in this section and the Option statement in P03 provides the exception for mobile operations. I propose the following revisions to P02: "When redirection of the road users’ normal path is required, they shall be directed from the normal path to a new path with appropriate temporary traffic control devices." |
| 6B.07 | NO | YES | N/A | I support the reorganization and revision of Section 6B.07. I respectfully ask FHWA add 80 mph and an associated Distance to Table 6B-2. |
| 6B.08 | YES | N/A | N/A | I support the reorganization and revisions of Section 6B.08. |

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| 6C.02 | NO | YES | N/A | I support the relocations and revisions in Section 6C.02 including changing the Standard statement to guidance in P02, with the exception of the wording in new guidance statement in P10. I respectfully request that the first part of the sentence, "Due to the likelihood of high pedestrian presence in site roadways open to public travel" be deleted and that the sentence start with "TTC zones should be designed..." I think it seems hyperbole to state that "high pedestrian presence" is likely just because the roadway is "open to public travel." |
| 6C.03 | YES | N/A | N/A | I support the revisions to Section 6C.03. |
| 6C.04 | NO | YES | N/A | I respectfully ask FHWA to replace "accidents" with "crashes" at the end of Section 6C.04, P03.D. Crashes is the appropriate term to use. |
| 6C.05 | YES | N/A | N/A | I support the revisions to Section 6C.05. |
| 6D.02 | NO | YES | N/A | I agree with the revisions made, including deletion of the STOP/SLOW paddle size, as long as the size remains to be shown in Table 6G-1. I respectfully request further revisions to coordinate with Section 2A.20. I request that FHWA delete letters A, B, and C from the list of patterns in P06. I also request that the Standard first standard after the flashing light display list (P07) be deleted. |
| 6D.03, 6D.05 | YES | N/A | N/A | I support the revisions to Sections 6D.03 and 6D.05. |
| 6D.06 | NO | YES | N/A | I generally support the revisions to Section 6D.06. I respectfully ask FHWA to add "Except as provided in paragraph 2," to the beginning of P01. I also request FHWA to add a new P02 as an Option as follows: "If stopping sight distances are not achievable, flagger stations may be modified based on engineering judgment." |
| 6E.04 | YES | N/A | N/A | I support the revisions to Section 6E.04. |
| 6F.01 | NO | YES | N/A | I support the revisions and relocations in Section 6F.01, including changing a standard to guidance. I respectfully ask FHWA to change the reference to the "Standard Highway Signs and Markings book" reference to "Standard Highway Signs publication" to be consistent with how the publication is referenced elsewhere in the NPA. |
| 6F.02 | YES | N/A | N/A | I support the revisions to Section 6F.02. |
| Figure 6G-1 | NO | YES | N/A | Signs R11-2, R11-3a, G20-5aP, R2-11, R2-11, R2-12, R2-6P, R2-6aP, R2-6bP, R9-8, R9-9, R9-10, R9-11, and R9-11a are mentioned Chapter 6G and are said in the sections to be shown in Figure 6G-1, but these appear to be omitted from the figure. I respectfully ask that these signs be shown on the figure. The sign shown as R9-4a in Figure 6G-1 should be R4-9a as described in Section 6G.07. |
| 6G.04 | NO | YES | N/A | I generally support the revisions to Section 6G.04. Based on Typical Application 7, I conclude that it is inappropriate to use a ROAD (STREET) CLOSED sign when a road is diverted. I therefore respectfully request that the Standard in Section 6G.04 be revised as follows:  "The ROAD (STREET) CLOSED sign shall not be used where road user flow is maintained through the TTC zone with a reduced number of lanes on the existing roadway, where the roadway is diverted, or where the closure is some distance beyond the sign." |

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| 6G.07 | YES | N/A | N/A | I generally support the revisions to Section 6G.07.  I support the addition of STAY IN LANE TO MERGE POINT (R4-9a) sign. However, the sign number for the new sign appears to be incorrect in Figure 6G-1 and Table 6G-1. Section 6G.07 assigns the sign designation R4-9a whereas the Figure and Table show R9-4a. Please resolve this inconsistency. Also, in Table 6G-1, the STAY IN LANE sign is listed twice; once as R4-9 and once as R9-4. I respectfully ask FHWA to resolve this inconsistency.  I respectfully ask FHWA to further revise Section 6G.07 to better align with Section 2B.41. I ask FHWA to revise P1 and to add a new paragraph after P1 as follows:  “Option:  01 A STAY IN LANE (R4-9) sign (see Figure 6G-1) may be used on a multi-lane highway where a shift has been incorporated to direct road users around road work.  Guidance:  02 If a STAY IN LANE SIGN is used, it should be accompanied by solid white lane lines to discourage or prohibit lane changing.”  Please also see my comments on Section 2B.41 and for Typical Application 36. |
| 6G.10 | NO | YES | N/A | I support the revisions to Section 6G.10, including deletion of audible information device. However, the R9-9, R9-10, R9-11, and R9-11a signs are not shown in Figure 6G-1 as indicated. I respectfully request that FHWA show these signs in Figure 6G-1. |
| 6G.11 | NO | YES | N/A | I agree with changing this sign from a warning sign to a regulatory sign in Section 6G.11. I also agree with the section as worded and inclusion of the R22-2 sign in Figure 6G-1 and Table 6G-1. However, "(R22-2)" should replace "(RXX-X)" in the section. Further, Figure 6P-2 should show the regulatory sign rather than the warning sign from the 2009 Manual. |
| Figure  6H-1 | NO | YES | N/A | Signs W20-1, W20-2, W20-3, W20-4, W20-5, W20-5a, W9-3, W4-2, W13-4P, W5-4, W23-1, W23-2, W20-7, W20-7a, W6-3, W6-4, W21-1, W21-1a, W21-2, W21-3, W8-6, W11-10, W21-5, W21-5a, W21-5b, W21-6, W21-7, W22-1, W22-3, W8-4, W8-9, W8-17, W8-17P, W8-11, W8-24, W8-12, W1-4 Series, W21-1 Series, W13-1P, W7-3aP, are W8-15P are mentioned Chapter 6H and are said in the sections to be shown in Figure 6H-1, but these appear to be omitted from the figure. I respectfully ask that these signs be shown on the figure. |
| 6H.01 | NO | YES | N/A | I support the revisions to Section 6H.01. Editorial change: Reference should be changed to the "Standard Highway Signs" publication for consistency with updated throughout the manual. |
| 6H.03, 6H.04, 6H.05, 6H.06, | YES | N/A | N/A | I support the revisions to Sections 6H.03, 6H.04, 6H.05, and 6H.06. |

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| 6H.07 | NO | YES | N/A | I support the revisions presented in Section 6H.07.  I agree with revising and changing paragraphs from Standard to Option.  I respectfully ask FHWA to include each of the revisions proposed by the NCUTCD in 17B-TTC-01 to coincide with revisions to Typical Application 36. Among the revisions proposed is inclusion of the W9-4 Interior Lane Shift sign which has been included in Figure 6H-1, but is not mentioned in Section 6H.07. I recognize that the W9-4 sign designation is already used in Part 2 and I recommend that the Interior Lane Shift Ahead sign be designated as W9-3a instead of W9-4. I request that FHWA add a new guidance paragraph at the end of Section 6H.07 that states, "The Interior Lane Shift Ahead (W9-3a) symbol sign (see Figure 6H-1) should be used in advance of that point where work occupies the interior lane(s) and approaching motor vehicle traffic is directed to the right or left of the work zone in the interior lane by using a shifting taper to route traffic around the closed interior lane."  I agree with the relocation of the W9-3 sign to this section and recommend further revisions to P04. I respectfully request revising P04 as follows, "The CENTER LANE CLOSED AHEAD (W9-3) sign (see Figure 6H-1) should be used when a lane separating directions of traffic, such as a two-way left-turn lane, is closed." |
| 6H.08, 6H.24, 6H.25 | YES | N/A | N/A | I support the revisions to Sections 6H.08, 6H.24, and 6H.25. |
| 6H.36 | NO | YES | N/A | I generally support the revisions to Section 6H.36. Like the NCUTCD and AASHTO, I respectfully ask FHWA to add two new Option statements to clarify situations when it may be appropriate to omit the END ROAD WORK sign. The recommended text for those new Option statements is provided by the NCUTCD and AASHTO. |
| 6J.01 | NO | YES | N/A | I support the revisions to Section 6J.01, including changing P04 from a Standard to Guidance. I respectfully ask FHWA to delete or clarify "as soon as practical" from P04 because the meaning is subjective.  I respectfully ask FHWA to revise P5 and add P7 as follows:  "05 Except as provided in paragraph 7, painting over existing pavement markings..."  "Option:  "07 Non-reflective paint or asphalt material may be used to cover conflicting pavement markings when the markings are outside of vehicle travel paths and the conflicting marking will not reflect through the covering material." |
| 6J.03 | YES | N/A | N/A | I support the revisions to Section 6J.03. |
| 6K.01 | NO | YES | N/A | I generally support the revisions to Section 6K.01. However, I respectfully ask that FHWA restore the option after P03 that indicates that a gap may be used to facilitate drainage. I do not see that this is repetitive with the Standard in P01. |

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| 6K.02 | NO | YES | N/A | I support the additions of the new section, the revisions and additions, and respectfully request further refinement. I respectfully request that the new guidance statement in P10 be revised as follows: "When used, a continuous wall should have a lower edge no more than 2 inches above the walkway, should extend a minimum of 32 inches above the walkway, and should have a common vertical face., and should have alternating, contrasting sheeting positioned 32 inches above the walkway." My reason for this request is it is impractical to add sheeting material to existing continuous walls. Further, I respectfully request that FHWA revise the option statement in P16 with the following:  "On the pedestrian side of the Pedestrian Channelizing device, the alternating dark and light stripe on the may have sheeting may be oriented vertically." |
| Figure  6K-2 | NO | YES | N/A | I support the inclusion of new Figure 6K-2 and respectfully request revisions to the figure. I ask that the note leaders in the top half of Figure 6K-2 point to the top and center of the hand-trailing edge. I further request that the "2 inches MIN." shown in the top half of Figure 6K-2 and Note 1 on the figure be deleted. It is my understanding from the text in Section 6K.02 that the hand trailing edge can be integrated into the pedestrian channelizing device and does not need to be attached two inches from the face of the support device. |
| 6K.07, 6K.09 | YES | N/A | N/A | I support the revisions to Sections 6K.07 and 6K.09. |
| 6K.10 | NO | YES | N/A | I respectfully ask FHWA to delete the second sentence of the second Standard in P07. The following should be deleted: "The interlocking devices shall not have gaps that allow pedestrians to stray from the channelizing path." It seems impractical that there will be gaps if the longitudinal devices are interlocked. |
| 6K.11 | YES | N/A | N/A | I support the revisions to Section 6K.11. |
| 6L.01 | NO | NO | YES | I do not support the revisions to P4 of Section 6L.01. I respectfully ask FHWA to retain engineering judgment and reword the sentence.  I agree with deleting "are needed" and adding "should be provided" and ask that P04 be worded as follows: "Where pedestrian traffic is detoured to a temporary traffic control signal, engineering judgment should be used to determine if pedestrian signals or accessible pedestrian signals should be provided for crossing along an alternate route."  To address APS on a roadway that normally has APS, I respectfully ask FHWA to add a guidance statement after P04 as follows: "If the existing traffic signals along the roadway have accessible pedestrian signals, the temporary traffic signals should have accessible pedestrian signals." |
| 6L.02 | NO | YES | N/A | I generally support the revisions to Section 6L.02. However, 1 respectfully ask FHWA to delete P08, "AFADs shall meet the crashworthy performance criteria contained in Section 6A.04." I conclude that this sentence is redundant with other sections that address crashworthiness. |
| 6L.03 | NO | YES | N/A | I support the revisions to Section 6L.03. However, the R1-7a sign is shown in Figure 6L-1 and referenced in Section 6L.03 but is not included in Table 6G-1. I respectfully ask that this sign be added to Table 6G-1 to specify a minimum size for the combined message sign. |
| 6L.04, 6L.07 | YES | N/A | N/A | I support the revisions to Sections 6L.04 and 6L.07. |
| 6M.01 | YES | N/A | N/A | I support the revisions to Section 6M.01. |
| 6M.02 | NO | YES | N/A | I support and appreciate FHWA including text regarding positive protection and positive protection devices and support the revisions proposed by FHWA starting in P03 to the end of the section.  I respectfully ask FHWA to revise Section 6M.02 to match the new section that was proposed as Section 6F.84a by the NCUTCD in NCUTCD proposal 19B-TTC-02. The new text in P01 and P02 appears to be verbatim from 23 CFR Part 630.1108(a). However, as stated in that CFR, the text applies to federal-aid projects and is recommended, but not required, for other highway projects. For that reason, P01 should be changed to guidance rather than be a standard. As written, P01 creates a new requirement for projects that do not use federal funding. Additionally, "long-term stationary" is a term defined in the MUTCD with a duration of 3 days or longer which differs significantly to the "two weeks" in the CFR. For these reasons I respectfully ask FHWA to change P01 to guidance and change the evaluation of positive protection devices to be based on engineering judgment and to change "long term stationary" in P02.B to "longer duration work zones" as recommended by the NCUTCD in NCUTCD proposal 19B-TTC-02.  Lines 23 and 24 of page 587 of the "Mark-up" appear to be an option with the use of "may." I recommend and respectfully ask FHWA to move the support heading to line 39 of the "Mark-up."  Finally, I respectfully ask FHWA to add a new reference document to Section 1A.05 as follows: "XX. “Guidelines on the Use of Positive Protection in Temporary Traffic Control Zones,” 2010 Edition (FHWA)" |
| 6M.02 cont. | NO | YES | N/A | With the background of our prior comment, I respectfully request that P01 and P02 be replaced with the following:  "Support:  01 The function of positive protection devices is to reduce risk to workers and road users by reducing the risk of vehicle intrusion into the work space.  02 Examples of positive protection devices include temporary traffic barriers, truck-mounted attenuators (see Section 6M.05), and vehicle arrestor systems.  Guidance:  03 The need for positive protection devices should be based on engineering judgment and should consider the following factors:  A. Work zones that provide workers no means of escape from motorized traffic (e.g., tunnels, bridges, etc.);  B. Longer duration work zones (e.g., two weeks or more) resulting in substantial worker exposure to motorized traffic;  C. Projects with high anticipated operating speeds (e.g., 45 mph or higher), especially when combined with high traffic volumes;  D. Work operations that place workers close to travel lanes open to traffic; and  E. Roadside hazards, such as drop-offs or unfinished bridge decks, that will remain in place overnight or longer.  Support:  04 For additional information see the “Guidelines on the Use of Positive Protection in Temporary Traffic Control Zones” (see Section 1A.05) and 23 CFR Part 630, Subpart K.” |
| 6M.04, 6M.05 | YES | N/A | N/A | I support the revisions to Sections 6M.04 and 6M.05. |

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| 6M.06 | NO | YES | N/A | I generally support the revisions to Section 6M.06. I recognize that portable rumble strips are used by states across the country to alert drivers to the presence of temporary traffic control zones. I respectfully ask FHWA to include an option statement after P05 as follows:  "Portable transverse rumble strips may be placed with in the temporary traffic control zone to alert road users to changes road conditions." This addition was previously proposed by the NCUTCD in proposal 17B-TTC-02 and I support the inclusion. |
| Delete 6F.81 | YES | N/A | N/A | I support the deletion of Section 6F.81. |
| 6M.08 | YES | N/A | N/A | I support the revisions to Section 6M.08. |
| 6N.01 | NO | YES | N/A | I support the addition of information on rolling roadblocks as this strategy can reduce the likelihood of queue related crashes. I respectfully request that the word "requires" be changed to "consists of" to avoid standard language in a Support statement. |
| 6N.04 | NO | YES | N/A | I support the revisions to Section 6N.04. Editorial change: "Figures 6P-49 through 6P-53" referenced in the Support statement should be 6P-47 through 6P-51." |
| 6N.05 | NO | YES | N/A | I agree with the relocations in Section 6N.05. I respectfully request that use of the SHOULDER WORK sign be retained as an option and not moved to guidance. |
| 6N.13 | NO | YES | N/A | I support the proposed relocations, additions, and revisions and respectfully request that FHWA make some further refinements.  I support the new text in what appear to be P02 and P03 if revised. The way the notes are currently written imply demand exceeds capacity any time a lane is closure, which is not necessarily true for all locations or all times of day. The new text also includes "may" which implies an option that I request to be changed to "could." In the same text, there is a typo in the first sentence.  With this background, I respectfully propose that P02 and P03 be revised with the following language:  "Guidance:  02 Attempts should be made to reduce the volume of traffic using the roadway or freeway to match the restricted capacity conditions. Road users should be encouraged to use alternative routes. When the roadway capacity is reduced due to lane closures, the demand could exceed the available capacity. This could result in either a lengthy stopped or slow moving queue of vehicles that may extend past the normal signs shown in the typical advance warning area. An assessment of the expected queue length should be a part of the temporary traffic control plan design process. Adjustments to the sign spacing and number of signs as well as the possibility of using more conspicuous devices could be provided to increase the distance and conspicuity of the advance warning area.  Option:  03 Work during off peak hours or at night. may be employed to mitigate the extended queue issue. When the work is limited to night hours, increased use of warning lights, illumination of work spaces, positive protection devices, and intelligent advance warning systems may be necessary." |
| 6N.14 | YES | N/A | N/A | I support the revisions to Section 6N.14. |

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| 6N.19 | NO | YES | N/A | I support FHWA's inclusion of this new Section for Late Merge. I respectfully request that FHWA delete the guidance sentence in P04. The sentence that I ask to be deleted is stated: "If used, the Late Merge should not be used on high speed or low volume roadways." It is my understand that late merge is used nearly exclusively "on high speed" roadways. The remainder of the sentence seems benign, but unnecessary. |
| 6O.01 | YES | N/A | N/A | I support the revisions to Section 6O.01. |
| 6P.01 | NO | YES | N/A | I support the revisions to Section 6P.01.  Organizationally, I recommend and request that FHWA Chapters 6N and 6P together. Chapter 6O should be relocated after Chapter 6P.  Table 6P-2 is missing from the NPA. The body of Tables 6P-3 and 6P-5 in the NPA appear to be the same, but the titles are different. If one is deleted, then the reference on line 13 of NPA page 611 should be revised.  I respectfully ask FHWA to update P6 with the final number of typical applications that will be included in the next edition of the MUTCD. |
| Typical App. 3 through 27 | NO | YES | N/A | As I’ve indicated in Table 2, I agree with the comments made by the NCUTCD and AASHTO on Typical Applications 3 through 27. |
| Typical App. 28 and 29 | NO | YES | N/A | As I’ve indicated in Table 2, I agree with the comments made by AASHTO on Typical Applications 28 and 29.  In general terms, I do not agree with the new standards requiring use of audible information devices. These requirements are stricter and allows less flexibility than 28 CFR 35.160(a) appears to allow. |
| Typical App. 30 through 35 | NO | YES | N/A | As I’ve indicated in Table 2, I agree with the comments made by the NCUTCD and AASHTO on Typical Applications 30 through 35. |
| Typical App. 36 | NO | YES | N/A | I support the revisions proposed by the NCUTCD and AASHTO for Typical Application 36. Further, I respectfully ask FHWA to make the following revision to Note 11 to coordinate with my comments to Sections 2B.41 and 6G.07:  “11. If a STAY IN LANE sign is used, it should be accompanied by solid white lane lines to discourage or prohibit lane changing.”  Please also see my comments for Sections 2B.41 and 6G.07. |
| Typical App. 37 through 46 | NO | YES | N/A | As I’ve indicated in Table 2, I agree with the comments made by the NCUTCD and AASHTO on Typical Applications 37 through 46. |
| Typical App. 47, 48, 49, 50, 51 | NO | YES | N/A | As I’ve indicated in Table 2, I agree with the comments made by AASHTO and generally agree with the comments made by the NCUTCD on Typical Applications 47, 48, 49, 50, and 51. |

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| Typical App. 52, 53, 54 | NO | YES | N/A | As I’ve indicated in Table 2, I agree with the comments made by AASHTO and generally agree with the comments made by the NCUTCD on Typical Applications 52, 53, and 54.  Since these are intersection related, I support relocation of these typical applications to immediately after Typical Application 27.  I support and appreciates inclusion of roundabout typical applications. However Typical Application 52 appears to be a repeat and a light version of Typical Application 53. I recommend keeping TA-53 and removing TA-52. If desired by FHWA, I will support the addition of options to TA-53 to use fewer TTC traffic control devices for short-term or short duration. |
| 7A.01 | YES | N/A | N/A | I support the revisions to Section 7A.01. |
| 7B.01, 7B.02, 7B.03, 7B.04 | YES | N/A | N/A | I support the revisions to Sections 7B.01, 7B.02, 7B.03, and 7B.04. |
| 7B.05 | NO | NO | YES | I do not support addition of new Section 7B.05. I note that signs showing rules of the road laws conflict with the guidance to avoid providing signs for rules of the road in Section 2A.01. I respectfully asks FHWA to omit this section and the associated figure. |
| 7B.06 | YES | N/A | N/A | I support the revisions to Section 7B.06. I also support the maximum beginning point of a reduced school speed limit zone in P6 as it appears to be based on research published by the Texas A&M Transportation Institute on behalf of TXDOT in 2008 that is referenced in the ITE Traffic Control Devices Handbook. |
| 7D.01, 7D.02 | YES | N/A | N/A | I support the revisions to Sections 7D.01 and 7D.02. |
| Part 8 | NO | NO | YES | I generally support the revisions to the sections in Part 8 as a whole. However, I have concern about the concept of the Diagnostic Team used throughout Part 8. I have concern about engineering judgment and engineering studies being performed by a group, which can conflict with state laws regarding the practice of engineering by individuals. I have concern that the Diagnostic Team concept conflicts with Sections 1D.04 and 1D.05. |
| Part 9 | YES | N/A | N/A | I support combining existing Sections 9A.02 through 9A.04 into new Section 9A.01.  I support deletion of existing Sections 9A.01, 9A.05, 9A.06, 9A.07 and 9A.08. |
| 9A.01, 9A.02 | YES | N/A | N/A | I support the revisions to Sections 9A.01 and 9A.02. |
| 9A.03 | NO | YES | N/A | I generally support the revisions to Section 9A.03. However, as I've commented in Chapter 3H, I have some concern about use of green pavement markings. |
| Chapter 9B | NO | YES | N/A | I support separating Chapter 9B into three new chapters. As an alternative, I will also support the idea of retaining the content in Chapter 9B and the creation of subchapters within Chapter 9B as was done in Part 2. |
| 9B.01 | YES | N/A | N/A | I support the revisions to Section 9B.01. |
| 9B.02, 9B.03 | YES | N/A | N/A | I support new Sections 9B.02 and 9B.03. |
| 9B.04 | YES | N/A | N/A | I support the revisions to Section 9B.04. |
| 9B.08 | NO | YES | N/A | I generally support the revisions to Section 9B.08. However, as I commented in Part 2, I think it makes more sense for FHWA to allow the symbols used in Chapter 2C to be used as exclusion signs rather than explicitly listing each exclusion. |
| 9B.10, 9B.12 | YES | N/A | N/A | I support new Sections 9B.10 and 9B.12. |
| 9B.11 | YES | N/A | N/A | I support new Section 9B.11. |
| 9B.14 | NO | YES | N/A | I generally support the revisions to Section 9B.14. I note that the R4-11 sign referenced in the section appears to be shown as R9-20 in Figure 9B-1. |
| 9B.15 | NO | NO | YES | I do not support new Section 9B.15. The R4-19 sign seems to be another example of a rule of the road that is discouraged in Section 2A.01. |
| 9B.16, 9B.17 | YES | N/A | N/A | I support new Sections 9B.16 and 9B.17. |
| 9B.18 | NO | YES | N/A | I generally support new Section 9B.18. However, I am not fully on board with the concept of two-stage bicycle turn boxes in general. |
| 9B.19, 9B.20, 9B.21, 9B.22, 9B.23, 9B.25 | YES | N/A | N/A | I support new Sections 9B.19, 9B.20, 9B.21, 9B.22, 9B.23, and 9B.25. |
| 9C.05, 9C.06, 9C.07, 9C.08 | YES | N/A | N/A | I support new Sections 9C.05, 9C.06, 9C.07, and 9C.08. |
| 9D.01 | YES | N/A | N/A | I support new Section 9D.01. |
| 9D.02 | NO | YES | N/A | I support the revisions to Section 9D.02. However, Figure 9D-2 does not contain drawings of the proposed new signs, D11-1d, D11-1e, D11-1f, and D11-1g. |
| 9D.03, 9D.04 | YES | N/A | N/A | I support new Sections 9D.03 and 9D.04. |
| 9D.05 | YES | N/A | N/A | I support the revisions to Section 9D.05. |
| 9D.06 | NO | YES | N/A | I generally support the revisions to Section 9D.06. However, the M1-8b and M1-8c signs should be displayed in a figure. |
| 9D.07, 9D.08, 9D.09, 9D.10 | YES | N/A | N/A | I support the revisions to Sections 9D.07, 9D.08, 9D.09, and 9D.10. |
| 9D.12 | YES | N/A | N/A | I support new Section 9D.12. |
| 9D.13 | NO | YES | N/A | I generally support new Section 9D.13. However, I am not totally on-board about two-stage bicycle turn boxes in general. |
| 9E.01 | YES | N/A | N/A | I support the revisions to Section 9E.01. |
| 9E.02 | YES | N/A | N/A | I support new Section 9E.02. |
| 9E.03 | NO | YES | N/A | I generally support new Section 9E.03. However, I am not totally on-board with extending bicycle lanes through intersections. |
| 9E.04, 9E.06, 9E.07, 9E.08, 9E.10 | YES | N/A | N/A | I support new Sections 9E.04, 9E.06, 9E.07, 9E.08, and 9E.10. |
| 9E.05, 9E.09 | YES | N/A | N/A | I support the revisions to Sections 9E.05 and 9E.09. |
| 9E.11 | NO | YES | N/A | I generally support new Section 9E.11. However, I am not totally on-board about two-stage bicycle turn boxes in general. |
| 9E.12 | NO | YES | N/A | I am generally not on board with bicycle boxes. I would like to see recommended conditions to warrant the use of a bike boxes. |
| 9E.13, 9E.15 | YES | N/A | N/A | I support the revisions to Sections 9E.13 and 9E.15. |
| 9E.14, 9E.17 | YES | N/A | N/A | I support new Sections 9E.14 and 9E.17. |
| 9F.02 | YES | N/A | N/A | I support new Section 9F.02. |
| Chapter 9G | NO | YES | N/A | I support the idea of new Chapter 9G, but I cannot comment on material that has not been provided. |
| 9G.01, 9G.02, 9G.03, 9G.04, 9G.05, 9G.06 | NO | YES | N/A | I support the idea of new Sections 9G.01, 9G.02, 9G.03, 9G.04, 9G.05, and 9G.06, but I cannot comment on material that has not been provided. |
| Appendix A1 | NO | YES | N/A | I generally support the content in the Appendix. However, I think the use of “Clearview” font is generally unnecessary and complicates the already difficult task of designing guide signs. I recognize that Congress has imposed certain requirements on FHWA and I support FHWA’s effort to respond. |
| Appendix A2 | NO | NO | YES | Appendix A2 appears to be unnecessary and I respectfully ask FHWA to remove Appendix A2. |

**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 |
| 67, John Fisher (FHWA-2020-001-2770\_attachment\_1) | YES | N/A | I agree with comments by John Fisher. |
| Typical Applications 3 through 27 – AASHTO and NCUTCD | YES | N/A | I agree with the comments prepared by AASHTO and the NCUTCD for Typical Applications 3 through 27. |
| Typical Applications 28, 29 – AASHTO | YES | N/A | I agree with the comments prepared by AASHTO for Typical Applications 28 and 29. |
| Typical Applications 30 through 35 – AASHTO and NCUTCD | YES | N/A | I agree with the comments prepared by AASHTO and the NCUTCD for Typical Applications 30 through 35. |
| Typical Applications 37 through 46 – AASHTO and NCUTCD | YES | N/A | I agree with the comments prepared by AASHTO and the NCUTCD for Typical Applications 37 through 46. |
| Typical Applications 47, 48, 49, 50, 51 – AASHTO and NCUTCD | YES | N/A | I agree with the comments prepared by AASHTO for Typical Applications 47, 48, 49, 50, and 51. I generally agree with the comments prepared by the NCUTCD. |
| Typical Applications 52, 53, 54 – AASHTO and NCUTCD | YES | N/A | I agree with the comments prepared by AASHTO for Typical Applications 52, 53, and 54. I generally agree with the comments prepared by the NCUTCD including the NCUTCD’s request to add a new Typical Application for Circulating Lane Closure in a Multi-Lane Roundabout. |