



National Committee on Uniform Traffic Control Devices

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December 31, 2020

Nicole R. Nason, Administrator
Federal Highway Administration
U.S. Department of Transportation
1200 New Jersey Avenue S.E.
Washington, DC 20590

Re: Extension of Commenting Period for Docket No. FHWA-2020-0001

Dear Administrator Nason,

The National Committee on Uniform Traffic Control Devices (NCUTCD) is hereby requesting an extension of the docket period from 90 days to 180 days for the Notice of Proposed Amendments (NPA) that will ultimately result in the 11th edition of the Manual on Uniform Traffic Control Devices (MUTCD).

The NCUTCD is an organization whose sole purpose is to assist in the development of standards, guides and warrants for traffic control devices and practices used to regulate, warn and guide traffic on streets and highways. The NCUTCD recommends to the Federal Highway Administration and to other appropriate agencies proposed revisions and interpretations to the MUTCD and other accepted national standards. The NCUTCD develops public and professional awareness of the principles of safe traffic control devices and practices and provides a forum for qualified individuals with diverse backgrounds and viewpoints to exchange professional information.

In developing its recommendations, the NCUTCD utilizes a different process than other organizations and individuals who might be responding to the docket. A consensus-building process is employed which provides the opportunity for input from all members of its diverse membership. In order to respond to the docket, this process will require review of all of the proposed changes to the MUTCD, development of draft responses within the seven Technical Committees, approval of those responses by the NCUTCD Council comprising representatives of its 21 sponsoring organizations and submission of all of the recommendations to the docket.

The NPA has 647 numbered items, and the marked-up text of the proposed changes to the MUTCD is 784 pages long. It should be noted that the 2008 NPA, which led to the 2009 MUTCD, had 513 numbered items, and its docket period was 180 days; yet, with the more extensive current NPA, only one-half of the time is being afforded for the development of a response.

Nicole R. Nason, Administrator

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The Federal rulemaking process is admittedly tedious, and all parties involved are desirous that a new MUTCD will be published as soon as practicable. The 2008 process took over almost two years, but in striving to expedite the current process, it is short-sighted to limit the length of the docket. Of all of the various steps in this process, the most important with the most value-added toward the excellence of the Final Rule is the input received during the docket period from practitioners nationwide. The single organization with the most diverse group of practitioners and persons interested in traffic safety is the NCUTCD, and thus, its input should carry considerable influence in the formulation of the Final Rule. The quality of such input is enhanced by its consensus-building process, but time must be afforded for this process to best be utilized. We do not believe that the simple addition of 90 days to the docket period is not too much to ask in order for the value of this process to be realized.

Additionally, the NPA was published just 11 days before Christmas. As such, the 90 day period includes one of the most important holiday periods of the year when many are taking extended time off to be with family. Thus the effective time available for meaningful work on review of the NPA and development of the response to the docket is in fact shorter than would be the case at another time of the year.

For all of these reasons, the NCUTCD respectfully requests that the docket period be extended from 90 days to 180 days for the subject NPA. Thank you for your consideration of this request.

Sincerely,



Gene Hawkins
Chair, NCUTCD