



October 31, 2011

U.S. Department of Transportation
Dockets Management Facility
1200 New Jersey Ave., SE
Washington, DC 20590
<http://www.regulations.gov>

**Re: FHWA Docket No. FHWA-2010-0159
National Standards for Traffic Control Devices; the Manual on Uniform Traffic Control
Devices for Streets and Highways; Revision**

AAA, AARP, and the American Highway Users Alliance welcome the opportunity to comment on the proposed amendments to compliance dates in the Manual on Uniform Traffic Control Devices (MUTCD) related to minimum maintained levels of retroreflectivity for traffic signs. The notice of proposed amendments (NPA) was published in the Federal Register on August 31, 2011.

Representing tens of millions of Americans who depend primarily on public roads for their livelihoods and to meet their transportation needs, we have a strong interest in ensuring that cost-effective, life-saving road improvements are implemented as widely and quickly as possible throughout the U.S. For that reason, our organizations have previously commented in support of a national standard for minimum maintained retroreflectivity levels as well as the compliance deadlines associated with it.

National Standard for Minimum Maintained Levels of Retroreflectivity

After nearly two decades of research and analysis to determine the minimum level of luminance in traffic signs necessary for safe nighttime driving, the Federal Highway Administration (FHWA) published this important national safety standard on December 21, 2007. The standard requires public agencies to establish and implement a management or assessment method designed to ensure that traffic signs provide at least the minimum amount of luminance, identified through research, so that average drivers can see and react to the signs appropriately and without delay at night. The FHWA rule gave agencies five years to establish a management or assessment method consistent with their local circumstances. It also allowed seven years to

replace failed warning and regulatory signs and 10 years to replace failed street name and overhead guide signs. As indicated in our previous comments, we believe these compliance deadlines are fairly lengthy but rational.

Notice of Proposed Amendment

In the current NPA, FHWA proposes to eliminate the two deadlines for replacing failed signs. In addition, the proposal would extend by two years the deadline for establishing and implementing a sign management method, while making that new deadline applicable only to the required management method for warning and regulatory signs. FHWA indicates that these changes are designed to ease the financial burden on public agencies and to allow the agencies to replace failed signs via a systematic upgrading process. "Agencies can decide, where appropriate, to defer upgrading certain non-compliant devices until the device wears out, is damaged or destroyed, or is replaced,"¹ according to FHWA's explanatory background published with the NPA.

In light of the potential adverse impact on road safety, we oppose these proposed changes. Allowing agencies to leave in place traffic signs that have little or no remaining retroreflectivity is a recipe for nighttime crashes that could easily and fairly cheaply have been prevented. In addition, we believe the proposed changes run counter to the oft-repeated statement of U.S. Department of Transportation leaders that safety is the Department's top priority.

We recognize the difficult financial circumstances faced by some state and local governments because of the recession, and we believe it is possible for FHWA to address those concerns without undermining its own roadway safety objectives, as the NPA would do. We urge FHWA to consider simply extending for up to three years each of the two replacement deadlines associated with the sign retroreflectivity standard.

Such an extension would mean that failed regulatory and warning signs could remain in place until 2018, while failed overhead guide and street name signs could be standing until 2021. It would also leave intact the existing deadline for implementing a sign management method, which should have relatively little cost impact on the state and local agencies. This is far from an ideal compromise in terms of motorists's safety, but it would allow many years for economic recovery and planning in order for state and local governments to undertake these important and relatively inexpensive road safety improvements.

To reiterate the basis of our organizations' interest in this issue, we hereafter repeat a portion of our previous joint comments to this docket.

¹ 76 FR 54157, August 31, 2011.

Safety is at Stake

The national standard for minimum maintained levels of retroreflectivity in traffic signs is designed to address an important roadway safety problem in a cost-effective, practical manner.

The safety problem is as straightforward as it is serious. Although only 25 percent of travel occurs at night, about half of traffic fatalities occur during nighttime hours.² Providing retroreflective delineation and signing is important as a means of reducing the higher nighttime crash rates,³ according to the FHWA. We agree.

Research shows that highly retroreflective sheeting makes traffic signs more conspicuous and, thus, motorists are able to understand and react to the signs more quickly. In fact, a recent study at the University of Iowa found a direct correlation between a sign's brightness and a driver's ability to comprehend the sign's message.³ As a result, brighter signs require less eyes-off-the-road time and more time to attend to the driving task, which is directly related to safety.⁴

Beyond its importance to the general motoring public, the national standard for minimum levels of retroreflectivity in traffic signs addresses a need that is particularly prevalent among older drivers. As stated in our 2006 joint comments to the docket, "The amount of light needed by drivers doubles every 13 years, starting at age 20. A 72-year-old needs 16 times the amount of light required by a 20-year-old to drive safely."

These facts are important because the overwhelming majority of the older population currently meets its mobility needs through use of the private automobile. The number of persons age 65 and over is projected to increase by 80 percent between 2010 and 2030, reaching 72 million. The number of older drivers will grow dramatically too, particularly those drivers age 85 and over.

As a result of the need for more light in order to see and respond appropriately to the visual cues, including traffic signs that make safe driving possible, many older drivers today restrict their

² http://safety.fhwa.dot.gov/roadway_dept/night_visib/policy_guide/fhwasa08001/

³ Schnell, T., Yekhshatyan, L., Daiker, R., Konz, J., *Effect of Luminance on Information Acquisition Time and Accuracy from Traffic Signs*. Paper accepted for presentation and publication, Transportation Research Record, Journal of the Transportation Research Board, 2008. Full report available at <http://www.ccad.uiowa.edu/opl/projects/luminance>

⁴ Turner-Fairbank Highway Research Center Technical Report No. FHWA-HRT-07-042, *Maintaining Traffic Sign Retroreflectivity: Impacts on State and Local Government*. Federal Highway Administration, McLean, Virginia. April 2007, P4.

driving to daylight hours. Signs that are maintained at a sufficient level of brightness will contribute significantly to safer driving and greater mobility for older adults.

For all of these reasons, we believe the national standard for minimum nighttime performance (i.e., retroreflectivity levels) of traffic signs is a critical safety enhancement. Once fully implemented, it will reduce the number and severity of nighttime crashes while, simultaneously, improving the quality of life for many Americans whose mobility depends on the use of a private vehicle.

Misleading News Reports about “Replacing *Perfectly Good Signs*”

Certain news reports and the statements of some public officials have confounded several different MUTCD provisions and spread misleading information. In addition to the requirements associated with the minimum maintained levels of retroreflectivity, some news reports have mentioned a provision requiring the use of mixed-case lettering on street name signs and a separate provision recommending but not requiring that the initial upper-case letter be at least 6 inches in height for street name signs on two-lane roads with a posted speed limit greater than 25 mph. Both of these provisions are included in Sec. 2D.43 of the MUTCD.

While both of these provisions are safety enhancements backed by research demonstrating drivers' ability to read and understand such signs faster and at a greater distance, the important point is that **no state or local agency is required to modify existing street name signs**. Those signs can continue to be used until they need to be replaced due to the end of service life or for some other reason. Thus, these provisions (one is a requirement applicable to newly installed signs; the other is a recommendation only) impose no additional costs on public agencies.

Of the three separate MUTCD provisions related to traffic signs that have been mentioned most frequently in news reports, only the national standard on minimum maintained levels of retroreflectivity would actually require public agencies to replace existing signs by a deadline. As we have stated, the applicable deadlines are still years away, and **only those signs that fail to meet minimally acceptable performance levels for retroreflectivity must be replaced. Those are failing or failed signs**. Thus, contrary to many news reports and the statements of some public officials, none of these MUTCD provisions would require state or local governments to replace perfectly good traffic signs.

Thank you for this opportunity to comment.

Sincerely,

AAA

AARP

American Highway Users Alliance