

I question whether Revision Number 2 is an Unfunded Mandate as identified in 1995 Unfunded Mandates Reform Act of 1995. It appears the dollar amount to meet this is 120.7 million dollars a year (page 17 of Register Notice). In calculating cost for converting all sign, assumption has been made that this will be done as normal maintenance. Replacing 15% of ground mounted signs ever year will go well above what can be done as standard maintenance.

Regarding the 7 year compliance period for change over. The seven year will begin once the final rule is passed (estimated Jan. 2005). Many state (Washington) will not adopt Revision 2 for up to two years. This would reduce their time frame to 5 years to complete changeover. If this is true, they will need to replace 20% per year. I believe about one third of States have State supplements. I would guess that most of them would also take approx. 2 years to adopt Revision 2.

I fully support the intent of FHWA, and believe changing signs will greatly improve safety for motorist. I believe the Federal Government should fund this project rather than leaving it up to local jurisdictions.

Cost estimates for a single state agency (Page 19 and 20 of "Maintaining Traffic Sign Reflroreflectivity: Impacts on State and Local Agencies (Draft) indicated they would need to hire 76 additional personel. If we assume the cost for these employees is \$50,000 annually, that would put labor cost for one state at 3.5 million a year of 35 million for the ten year program. If you multiply this time fifty states you would get 1.75 billion. Now divide that by 10 and you get annual costs of 175 million dollars, which would fall well above the 120.7 that is basis for unfunded mandate. This estimate is limited to labor costs and does not include material and equipment costs.

CONCLUSION

Sign reconstruction has potential of making great improvement in safety on the roadways. Expecting state and local agencies to have available funding to accomplish this is naive. If this project is to be accomplished, the Federal Government must come up with funding specifically allocated to it.