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October 6, 2004

U.S. Department of Transportation
Dockets Management Facility Room PL-401,
400 Seventh Street, SW.
Washington, DC 20590

RE: **Docket No. FHWA-2003-15149** – 21

Dear Sir or Madam:

I am writing to you in regard to the recent proposal to amend the Manual on Uniform Traffic Control Devices for Street and Highways. More specifically Docket No. FHWA-2003-15149. I feel that the agency's desire to standardize the replacement of signs that no longer meet the retroreflectivity requirement is necessary and important to our society today. The agency very correctly assumes that many of the signs on our roads today do not adequately reflect enough light to be seen clearly in the dark. I have personal experience with such a case.

One night on the way home from a neighboring town, a friend and I were attempting to navigate our way back to the main highway. Once we were finally able to intersect the necessary road we realized that, to cross the highway, we would have to go on the frontage road and take the next turn around point. After a few miles on the frontage road the highway became a bridge and we kept going on the frontage road, as a sign instructed that a turn around point wasn't far ahead. Little did we know that the frontage road ran into a river at a ninety degree angle and the road that led to the turn around on the highway paralleled the same river. As we were driving suddenly the truck dipped and all we saw from the headlights was rippling black water. The road had abruptly ended, but the black asphalt continued to the bank of the river. We were able to stop the vehicle a mere five feet away from the edge of the river. Bewildered, I quickly put the truck in reverse and backed up onto the frontage road. It was only then that we saw, 15 feet to the left of the road, a sign indicating that an immediate left was necessary. The reason that we failed to see this sign at first glance was because it simply did not reflect light properly. The vehicle in question was a then new 2001 Ford F-150, so the headlights were not to blame. I was not speeding and in fact was slowing down, awaiting the turn to avoid the river. The sign was only visible because of the slight gleam from the steel pole that supported it and even that took very close inspection from a stopped vehicle. It would have been practically impossible to notice the sign traveling at a reasonable rate of speed. It was in large part the fault of the non-retro reflectiveness of the sign that led to our predicament. Had it properly reflected the light from the head lights I would have slowed the vehicle and began looking for the road

that intersected the frontage road. This sign is undoubtedly one of the many around south Texas that is too old and has lost its ability to be legible at night time.

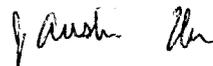
In your proposal you quote that five percent of all state maintained signs and eight percent of locally maintained signs no longer meet the minimum level of retroreflectivity. *It has been my experience that these numbers are perhaps too low and a much higher percentage of locally maintained signs no longer meet the proposed requirements.*

A very important point is brought up on page 45625, that this proposed requirement must be spaced out over several years to alleviate the assumed 144 million local cost and the 32 million state cost to replace signs that no longer reflect the minimum amount of light. Spacing the compliance date out over a 6 year interval would allow the agencies to slowly replace the signs, thus not placing a great financial burden on them. While this is suitable, it must also be acknowledged that with each year that a sign goes unreplaced, it is more dangerous to motorists. On pages 62 and 63 of the DOT's Traffic Safety Facts for 2000 you can see the disproportionate amount of accidents that occur at nighttime. While only one quarter of all traffic is on the road during the night time hours, the fatality rate per hour is over half that of the daytime hours. This shows the critical necessity for the DOT to attempt to speed up the replacement of signs that are no longer retroreflective. A great deal of money is at stake in having to replace the signs, however it pales in comparison to the 75 billion dollar economic cost of nighttime traffic accidents (1994 figure).

While it is understandable that an undertaking as large as the replacement of all traffic signs that do not meet the proposed requirements for retroreflectivity cannot occur overnight, it is an issue that should not be spaced out over six or seven years. Steps must be taken immediately to help curb the rising cost and disproportionate amount of traffic accidents that occur at night. While the retroreflectivity of signs might not play a role in some of the nighttime accidents, they assuredly play a role in a number of them; I myself was a very nearly an example of this. For the nighttime fatality and overall accident number to decrease, steps must be taken today. Imposing strict requirements for the replacing of signs that are no longer reflective will play an integral role in lowering this statistic.

Thank you for allowing comment on this regulation.

Sincerely,



J. Austin Elam

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