

Several commenters suggested that this be an OPTION, rather than GUIDANCE. The FHWA disagrees. The use of larger letter sizes is not precluded in the 2000 MUTCD, so it is already an option. Fewer agencies will convert their street name signs to the larger letter sizes if the GUIDANCE is reduced to an OPTION. The larger signs will be beneficial to all road users on higher-speed multi-lane streets, especially older road users. Also, many jurisdictions use post-top mountings of longer street name signs with larger letters, taking advantage of appropriately designed attachment hardware. Because this is GUIDANCE, rather than a STANDARD, jurisdictions can be used in special circumstances if determined necessary by the engineer. To mitigate the financial impact on State or local governments, the FHWA establishes a phase-in target compliance date of 15 years from the effective date of this final rule for existing signs in good condition. The phase-in target compliance date for symbol sizes and 6" letter sizes for lettering on ground-mounted Street Name signs on roads that are not multi-lane streets with speed limits greater than 60 km/h (40 mph) remains unchanged from that previously established, and is still January 9, 2012.

The FHWA also adds a clarification to the first OPTION statement. The OPTION statement in the 2000 MUTCD generally states that a symbol or letter designation may be used to identify the government jurisdiction. The FHWA revises the paragraph to provide more specificity by stating that a symbol or letter designation may be used on a Street Name sign to identify the governmental jurisdiction, area of jurisdiction, or other government-approved institution. This change provides additional flexibility for jurisdictions that install Street Name signs, allowing them to identify areas of the city, neighborhoods, and the like. The FHWA received no comments regarding this change, and adopts this change.

The FHWA adds to the first STANDARD statement that if a symbol or letter designation is used, the height and width of the symbol or letter designation shall not exceed the letter height of the sign. This provides for more uniform Street Name sign design and assures that the name of the street will have more prominence on the sign than the jurisdictional symbol or letter designation. The FHWA received one comment from ATSSA supporting this change, and one editorial comment, which the FHWA adopts in this final rule.

In the NPA, the FHWA proposed two changes in the second OPTION statement. First, the FHWA proposed eliminating midblock locations from the provision concerning locations where Street Name signs may be installed because Street Name signs are not appropriate at non-intersection locations. The FHWA received two comments from the NCUTCD and a local DOT opposed to this revision because there are locations other than intersections where Street Name signs are appropriate. The FHWA agrees and withdraws this proposal. Second, the FHWA eliminates the provision allowing the installation of a supplemental Street Name sign separately or below an intersection-related warning sign on intersection approaches because this is an inappropriate use of the sign. Instead, the Advance Street Name plaque, as described in Section 2C.49 Advance Street Name Plaque (W16–8, W16–8a), is appropriate for this purpose. The FHWA received no comments regarding this change, and adopts this change.

The FHWA adopts several changes to the fourth GUIDANCE statement. First, the FHWA eliminates the recommendation on the color of the supplemental Street Name sign when it is combined with a warning sign because this is now termed an Advance Street Name plaque and is discussed in Section 2C.49.

Second, the FHWA recommends that in urban and suburban areas, especially where Advance Street Name signs are not used, overhead-mounted street name signs be considered. If overhead Street Name signs are used, the lettering should be at least 300 mm (12 in) high in capital letters or 300 mm (12 in) upper-case letters with 225 mm (9 in) lower-case letters. The FHWA received two comments from ATSSA and the U.S. Access Board in support of this change, and five from the NCUTCD and State and local DOTs opposed to it. Those who opposed this change felt that the signs would be too large, that the size of the sign may not properly fit on traffic signal mast arms, that wind loading may also be an issue on mast arms, and that financial impacts would be high. The FHWA adopts this change in this final rule because 300 mm (12 in) letters are superior to 250 mm (10 in) letters in terms of legibility distance for older drivers as well as all drivers. Lettering on overhead signs need to be larger than roadside mounted signs to achieve adequate visibility. The 300 mm (12 in) size is a GUIDANCE, not a STANDARD, so smaller letters can be used if determined necessary by the engineer. To mitigate economic impacts,

the FHWA establishes a 15-year phase-in target compliance date from the effective date of this final rule (rather than January 9, 2012, as proposed in the NPA) for this paragraph, for existing signs in good condition.

Additionally, the FHWA adds a SUPPORT statement at the end of the section referencing Section 2C.49 for information regarding the use of street name signs as supplemental plaques for use with intersection-related warning signs. The FHWA received one editorial comment, which it incorporates in this final rule.

106. The FHWA adds a new section, numbered and titled "Section 2D.39 Advance Street Name Signs (D3–2)" that describes the uses, placement, legend, and lettering sizes for Advance Street Name signs. The FHWA received two comments from the City of Tucson, Arizona, and a traffic control device manufacturer supporting this new section, and several editorial comments that the FHWA adopts in this final rule.

The GUIDANCE includes two separate paragraphs regarding placement of Advance Street Name signs on arterial highways in rural areas and in urban areas. The FHWA received four comments from the NCUTCD and the Virginia, Minnesota, and Kansas DOTs opposing the language that Advance Street Name signs be used in advance of all intersections with exclusive turn lanes in rural areas. The Virginia DOT felt that this could have a major cost impact. The Kansas DOT felt that Advance Street Name signs could contribute to sign clutter along major arterials, and suggested that their use in urban areas be based on an engineering study. The FHWA disagrees and adopts the language, with minor modifications, in this final rule. The FHWA strongly encourages the use of these signs in rural and urban areas as specified in the MUTCD. These signs, especially in rural areas, are one of the most important things that can be done to improve older driver safety and convenience, and they also benefit other drivers. To mitigate economic impacts, the FHWA establishes a 15-year phase-in target compliance date from the effective date of this final rule (rather than January 9, 2012, as proposed in the NPA) for existing signs in good condition.

To respond to a comment by the NCUTCD suggesting that the paragraph is redundant, the FHWA withdraws the second OPTION statement that was proposed in the NPA because this information is contained in the first OPTION statement in this final rule.

To preserve consistency of letter sizes, the FHWA withdraws two paragraphs from the STANDARD statement that