

**INSURANCE INSTITUTE
FOR HIGHWAY SAFETY**

April 26, 2000

The Honorable Kenneth R. Wykle
Administrator
Federal Highway Administration
400 7th Street, S.W.
Washington, D.C. 20590

**23 CFR Part 655
Revision of the Manual on Uniform Traffic
Control Devices; Temporary Traffic Control
Docket No. FHWA 1999-6576**

Dear Administrator Wykle:

Section 6F-1 of the "Manual on Uniform Traffic Control Devices" addresses types of signs, including signs mounted on portable flexible supports, and states: "As a general rule, signs should be located on the right-hand side of the roadway." Unfortunately, to comply with this simple directive it has been the practice of contractors and local government employees in many temporary work areas to place such sign supports on sidewalks and in other areas intended for pedestrian access. This not only is a nuisance but also can cause pedestrians to walk in the roadway with motor vehicle traffic -- a potential safety hazard. In addition, placing supports on bicycle lanes or shoulders of secondary roads in urban areas can interfere with bicycle travel. To remedy this problem, the Insurance Institute for Highway Safety suggests the revised "Manual on Uniform Traffic Control Devices," Part 6, Section 6F-1, include language stating that portable flexible sign supports should not be located on sidewalks, bicycle lanes, or in other areas designated for pedestrian and bicycle traffic.

Sincerely,



Richard A. Retting
Senior Transportation Engineer

cc: Docket Clerk, Docket No. FHWA 1999-6576