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National Committee on Uniform Traffic Control Devices  
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Dear Members of the National Committee,

The League of American Bicyclists (League) would like to thank the members of the National Committee for responding to the relevant action items found in the National Transportation Safety Board (NTSB)'s report on speed and speeding. Those items as stated in the NCUTD Item No. 18B-0RW-03 were:

Revise Section 2B.13 of the Manual on Uniform Traffic Control Devices (MUTCD) so that:

- The factors currently listed as optional for all engineering studies are required,
- Require that an expert system such as USLIMITS2 be used as a validation tool, and
- Remove the guidance that speed limits in speed zones be within 5 mph of the 85<sup>th</sup> percentile speed.

Revise Section 2B.13 of the MUTCD to (at a minimum) incorporate the Safe System approach for urban roads to strengthen protection for vulnerable road users.

The League shares the concerns of the NTSB that speed and speeding contribute to far too many traffic fatalities each year. It is well established that vulnerable road users, such as pedestrians and bicyclists, can be greatly affected by relatively small changes in speed. Research by the AAA Foundation for Traffic Safety suggests that pedestrians have a 11% worse chance of survival when a vehicle increases in speed from 30 mph to 35 mph.

The League is grateful for the efforts of the National Committee and appreciates the outreach conducted in responding to the NTSB. As stated in Item No. 18B-0RW-03, at least to ongoing research projects may provide additional research on speed limits in the next year. The changes proposed by Item No. 18B-0RW-03 include several improvements, including:

- Including bicycle activity as a road context factor in Factor 01a(D),
- Removing the requirement that an "engineering study shall include an analysis of the current speed distribution of free flowing vehicles" from the Standard, and
- Expanding upon what is meant by road characteristics and including road context as guidance for engineers establishing or reevaluating speed limits within speed zones.

While the League welcomes the improvements described above, we believe that the proposed changes ultimately do not address the recommendations of the NTSB or adequately recognize the role that MUTCD guidance has played, and likely will continue to play, in speed limit setting.

- The factors currently listed as optional are still optional, although the language has been changed from "may" to "should,"
- There is no mention of an expert system, either as a validation tool, as a potential practice, or in any other manner,
- While the guidance that speed limits be within 5 mph of the 85<sup>th</sup> percentile speed has been limited to freeways, expressways, and rural highways it is still present and may be used illustratively in reference to other roadways, and
- There is no mention of a Safe System approach in any part of the proposed language.

The League believes that if the MUTCD is going to include optional guidance on speed limit setting, as it has done for years, then there is no reason to limit that guidance from mentioning methods of speed limit setting such as an expert system or Safe System approach. While these methods may be complex in application, mentioning them is not. This failure to provide guidance that might publicize, but would in no way require, expert and Safe Systems approaches to speed limit setting is compounded by offering no guidance on how to consider “reported crash experience for at least a 12-month period.”

Whether the National Committee likes it or not the MUTCD has been used as a reference manual for speed limit setting for years. Its long-time requirement to include an analysis of current speed distribution, but not other factors, has played an important role in how speed limits have been set throughout the country. Without providing similar visibility to, if not requiring the consideration of, other factors it is likely that many practitioners will continue to conduct speed studies as they always have and in ways that predictably make roadways more dangerous for vulnerable road users, such as bicyclists and pedestrians. Requiring consideration of non-speed factors and providing guidance that leads practitioners to alternative speed limit setting methods would proactively address the role the MUTCD has played in speed limit setting and will continue to play as long as it prescribes methods and provides guidance.

The United States has a persistent traffic safety problem. While once a leader, the United States now has a far higher per capita traffic death rate than other rich developed countries. The National Committee was a strong partner in making it possible for Americans to drive safely through the United States with uniform understandings of traffic controls. The National Committee should now be a strong partner in ensuring that the United States is headed towards zero roadway deaths by proactively guiding the practitioners that use the MUTCD to safer speed limit setting practices.

Best Regards,

Ken McLeod

Policy Director  
The League of American Bicyclists