

May 14, 2021

**VIA ELECTRONIC FILING**

Ms. Stephanie Pollack  
Acting Administrator  
Federal Highway Administration  
1200 New Jersey Avenue S.E., West Building  
Washington D.C. 20590-0001

**RE: FHWA Notice of Proposed Amendments (NPA): National Standards for Traffic Control Devices; the Manual on Uniform Traffic Control Devices for Streets and Highways; Revision, FHWA Docket No. 2020-0001, 86 Fed. Reg. 7838 (February 2, 2021)**

Dear Acting Administrator Pollack:

The Alliance for Automotive Innovation (“Auto Innovators”) appreciates this opportunity to provide input to the Federal Highway Administration’s (“FHWA”) on the FHWA Notice of Proposed Amendments (“NPA”) for the Manual on Uniform Traffic Control Devices for Streets and Highways (“MUTCD”).

Auto Innovators’ members<sup>1</sup> are committed to a safer, cleaner, and smarter transportation future, and automated vehicles (“AVs”) play a significant role in realizing this vision. By combining advanced sensing technologies with artificial intelligence to avoid crashes, AVs have the potential to reduce the number of fatalities on our nation’s roadways. Unlike conventional human drivers, AVs cannot get distracted, drive impaired, or fall asleep at the wheel. In addition, as AVs are scaled over time, they hold promise to provide numerous social and economic benefits, including less congestion, lower fuel consumption, and increased mobility for older adults and people with disabilities.

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<sup>1</sup> The Alliance for Automotive Innovation represents the manufacturers producing nearly 99 percent of cars and light trucks sold in the U.S. Its members are listed as follows: Aisin Group, APTIV, Argo AI, BMW Group, Bosch, Byton, Cruise, Denso, Ferrari, Ford, GM, HARMAN, Honda, Hyundai, Intel, Isuzu, Jaguar Land Rover, Karma, Kia, Local Motors, Luminar, Mazda, Mercedes-Benz, Mitsubishi Motors, Nisan NXP, Panasonic, Porsche, RV Industry Association, Sirius XM, Stellantis, Subaru, Suzuki, Texas Instruments, Toyota, Volkswagen Group of America and Volvo.

Auto Innovators supports the inclusion of AV-related infrastructure topics in a revised version of the MUTCD. The MUTCD has not been updated for over ten years and, in that time, vehicle technologies have dramatically changed. Advanced driving assist systems (“ADAS”) are increasingly common on new vehicles and vehicles with automated driving systems (“ADS”) are being tested on public roads. These technologies, which use on-vehicle sensors to perceive their surroundings, will benefit from consistent and well-maintained infrastructure, especially when such infrastructure is designed to support machine vision systems. In addition, these infrastructure improvements will provide a benefit to drivers of all vehicles – even those that do not have ADAS or ADS.

Last year, Auto Innovators released an AV Policy Roadmap (“Roadmap”) that provides a four-year action plan for federal policymakers to significantly advance the testing and deployment of AV technologies in the United States. One of the 14 recommendations included in this Roadmap is focused on preparing roadway infrastructure for AVs. Within this recommendation, Auto Innovators advocates that the FHWA revise the MUTCD to include items that will support and facilitate AV deployment.

The AV-related items in the revised MUTCD, including the new Part 5, are helpful because they will ultimately promote consistency in roadway infrastructure across the nation. Consistency in roadway infrastructure is a critical issue that can benefit all vehicles and drivers, including AVs.<sup>2</sup> The more that roadway lane markings, signage and traffic signals can be harmonized across the country, the faster and more seamlessly AVs can be deployed at scale. To this end, we encourage the FHWA to finalize the MUTCD update before the end of this calendar year.

In addition, we recommend that the FHWA create a mechanism for the MUTCD to be reviewed and, if appropriate, updated on a more frequent basis. ADAS and ADS technology will continue to develop and improve over the next 10 years; therefore, waiting for another major update in 10 years may not best facilitate the deployment or operation of these technologies. Auto Innovators members stand ready to support and provide input to a process by which the AV related aspects of the MUTCD may be updated on a more regular basis.

The MUTCD is the single federal resource that provides recommendations for states and localities on designing and maintaining their roadway infrastructure in a manner that is consistent across the nation. Incorporating AV-related information into the MUTCD would be extremely useful to states and localities interested in making infrastructure improvements to accommodate or facilitate AVs. Given the planning cycle for infrastructure owners and operators, the inclusion of AVs in a revised version of the MUTCD is appropriately timed and should not be further delayed.

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<sup>2</sup> This includes the infrastructure itself and processes around things like setting up / tearing down temporary work zones. Such processes should be organized in a manner that minimizes confusion for human driver and AVs. For instance, roadwork signs at the beginning and end of roadwork areas should be taken down after the temporary lines are removed.

Beyond the MUTCD update, Auto Innovators' Roadmap recommends that states be encouraged and even incentivized to update their infrastructure consistent with the AV-related items in the MUTCD. For instance, a new Federal grant program could be created to provide funding to states that voluntarily plan to make AV-related infrastructure updates in accordance with the MUTCD. This would provide a near-term incentive for states to begin making investments that would benefit drivers today and pave the way for future AV deployments.

We appreciate FHWA's attention to this important issue and would welcome any follow-up discussions. Thank you for your consideration of Auto Innovators' perspective.

Sincerely,

A handwritten signature in cursive script that reads "Anne Marie Lewis".

Anne Marie Lewis, PhD  
Senior Director  
Technology, Innovation, & Mobility Policy

