



Department of Public Works
Infrastructure Services Division

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Office of Transportation Operations
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In Accordance with Section 1A.10 of the Manual on Uniform Traffic Control Devices (MUTCD), the City of Milwaukee is requesting an Interpretation as to the time requirements for implementation of new traffic control signs and signals.

Paragraph 20 of the Introduction to the MUTCD indicates compliance times with Manual requirements are as follows:

20 After the effective date of a new edition of the MUTCD or a revision thereto, or after the adoption thereof by the State, whichever occurs later, new or reconstructed devices installed shall be in compliance with the new edition or revision.

Paragraph 22 of the Introduction to the MUTCD indicates compliance times with Manual requirements are as follows:

22 Unless a particular device is no longer serviceable, non-compliant devices on existing highways and bikeways shall be brought into compliance with the current edition of the National MUTCD as part of the systematic upgrading of substandard traffic control devices (and installation of new required traffic control devices) required pursuant to the Highway Safety Program, 23 U.S.C. §402(a). The FHWA has the authority to establish other target compliance dates for implementation of particular changes to the MUTCD [23 CFR 655.603(d) (1)]. These target compliance dates established by the FHWA shall be as shown in Table I-2.

A question has arisen as to the specific intent of the portion of the statement referring to both the "systematic upgrading of substandard traffic control devices" as well as "installation of new required traffic control devices", specifically as it relates to the upgrade of traffic control devices at signalized intersections.

Table I-2 provides a target date of December 22, 2013 for the installation of Pedestrian Countdown Signals. As these upgrades are systematically completed throughout the City, the text of this paragraph would suggest that all other improvements incorporated into the

2009 Edition of the MUTCD at signalized intersections would also be necessary at the time of this conversion. The additional costs of upgrades in terms of signal and sign placement (i.e. signal size and placement, pedestrian pushbutton signage requirements, overhead lane control signage, etc.) will far exceed the costs necessary to complete the conversion to the pedestrian countdown signals. An additional concern is related to the replacement of signal equipment and signage in the event of a knockdown, where multiple signal locations would require upgrade following the knockdown at a single signal location.

While there is certainly operational and safety benefits from uniformity in the deployment of these signing and signaling requirements both in the City of Milwaukee and nationwide, we believe that a more systematic approach via a combination of "at useful life replacement", and/or in conjunction with scheduled Capital Street Improvements and in consideration of some of the "Higher speed roadway" factors will achieve these goals without creating undue hardship and stress on already stretched budgets due to strict adherence to this standard. As such, we request that the relief be granted from the strict application of the requirements of this section, and be allowed to more systematically upgrade the other devices supplemental to the upgrade of the pedestrian countdown signals based on their average useful life, or in conjunction with major facility upgrades.

Beyond the issues noted above, Table I.2 also establishes target compliance dates for certain traffic sign and signal devices which place an extraordinary burden on local jurisdictions. Of particular concern are several compliance dates associated with the size, placement and retroreflectivity of regulatory, warning and guide signs (most notably requirements for street name signs), as well as the complete replacement of pedestrian indications at over 730 signalized intersections in the City. These requirements are stipulated to be in place ranging from 2013 to 2019. We are requesting a delayed implementation of the new requirements for reasons as stated below.

The City currently maintains a high level of traffic control safety and is generally already in compliance with many MUTCD requirements. We have reviewed our system as it relates to the noted requirements and standards, and have estimated the cost for the mandatory signing standards implementation to be approximately \$3.4 Million dollars and the cost of the Signal standards implementation to be approximately \$1.9 million dollars exclusive of funds anticipated to become available to the City under various federally funded grants and improvement programs, most noteworthy being grant funding anticipated for the replacement of pedestrian countdown signals. However, strict adherence to the provisions stipulated may make these improvements financially infeasible to the extent required under the current edition of the MUTCD.

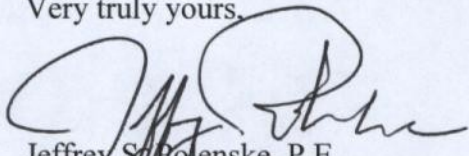
The City of Milwaukee has extremely limited capital funding and limited methods of raising additional capital. As such, we need to focus these limited funds on the infrastructure systems that are the highest priority, such as bridge and street capital replacement and maintenance,

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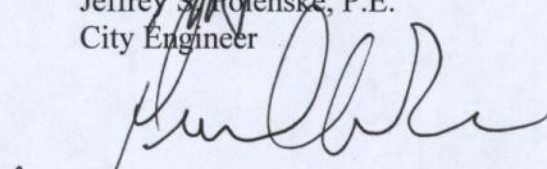
the lighting system itself and the overall signal and traffic control systems. Every capital dollar that the City is mandated to spend on lower priority items reduces our capacity to make the necessary capital investment in our core infrastructure system.

Thank you for the opportunity to express our concerns and for your consideration in this matter during these austere times. We look forward to your response concerning these issues.

Very truly yours,



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