



National Committee on Uniform Traffic Control Devices

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Accessibility Guidelines for Pedestrian Facilities in the Public Right-of-Way Docket ATBCB-2011-04, RIN 3014-AA26

The National Committee on Uniform Traffic Control Devices (NCUTCD) has reviewed the Proposed Accessibility Guidelines for Pedestrian Facilities. Several conflicts exist between the proposed guidelines and the 2009 MUTCD. The NCUTCD offers the comments and recommendations below concerning the proposed guidelines. These comments and recommendations were approved by a unanimous vote of the National Committee Council at their meeting on January 20, 2012.

(Text proposed for deletion is shown in ~~strike through red~~. Proposed new text is shown in underline blue.)

1. In Section R209.1, the NCUTCD recommends deletion of "and pedestrian pushbuttons" as shown. This phrase is unnecessary since the required accessible pedestrian signals include pushbuttons.

R209.1 General. Where pedestrian signals are provided at pedestrian street crossings, they shall include accessible pedestrian signals ~~and pedestrian pushbuttons~~ complying with sections 4E.08 through 4E.13 of the MUTCD (incorporated by reference, see R104.2). Operable parts shall comply with R403.

2. In Section R209.2, the NCUTCD feels that "when the signal controller and software are altered, or the signal head is replaced" are inappropriate events to require that existing signal heads be brought into compliance with R209.1. Examples of why these are considered inappropriate are:

- A change from one controller software version to another, especially when the reason for the software change is to address a problem or glitch in the current version, should not require the addition of APS.
- Controllers are frequently replaced as part of a trouble call response to return an intersection to proper operation following an equipment problem or failure. This should not require the addition of APS.
- Although the guidelines say "signal controller and software" rather than "signal controller or software", there are cases when a controller is being replaced to return the intersection to proper operation and that replacement controller has a new software version in it thus meeting the "and" condition. This should not require the addition of APS.

The NCUTCD recommends that R209.2 be modified as follows:

R209.2 Alterations. Existing pedestrian signals shall comply with R209.1 when the ~~signal controller and software are altered, or the signal head is replaced~~ traffic signal equipment is modified or a timing change is implemented that affects the ability of a pedestrian with disabilities to be aware of the change, such as reduction of walk time, pedestrian clearance, or installation of modified turn phasing. Traffic signal equipment modifications shall not include routine maintenance activities, repair or replacement of knockdowns or other such equipment damage, minor equipment upgrades, head changes, etc.

3. Section R306.2 requires that a pedestrian walking speed of 3.5 feet per second or less be used when calculating a pedestrian clearance time. The MUTCD includes GUIDANCE on walking speeds related to the timing of pedestrian signal intervals. Examples of that GUIDANCE are as follows:

(From 2009 MUTCD, 4E.06)

Guidance:

07 Except as provided in Paragraph 8, the pedestrian clearance time should be sufficient to allow a pedestrian crossing in the crosswalk who left the curb or shoulder at the end of the WALKING PERSON (symbolizing WALK) signal indication to travel at a walking speed of 3.5 feet per second to at least the far side of the traveled way or to a median of sufficient width for pedestrians to wait.

Option:

08 A walking speed of up to 4 feet per second may be used to evaluate the sufficiency of the pedestrian clearance time at locations where an extended pushbutton press function has been installed to provide slower pedestrians an opportunity to request and receive a longer pedestrian clearance time. Passive pedestrian detection may also be used to automatically adjust the pedestrian clearance time based on the pedestrian's actual walking speed or actual clearance of the crosswalk.

Guidance:

10 Where pedestrians who walk slower than 3.5 feet per second, or pedestrians who use wheelchairs, routinely use the crosswalk, a walking speed of less than 3.5 feet per second should be considered in determining the pedestrian clearance time.

Guidance:

14 The total of the walk interval and pedestrian clearance time should be sufficient to allow a pedestrian crossing in the crosswalk who left the pedestrian detector (or, if no pedestrian detector is present, a location 6 feet from the face of the curb or from the edge of the pavement) at the beginning of the WALKING PERSON (symbolizing WALK) signal indication to travel at a walking speed of 3 feet per second to the far side of the traveled way being crossed or to the median if a two-stage pedestrian crossing sequence is used. Any additional time that is required to satisfy the conditions of this paragraph should be added to the walk interval.

The NCUTCD feels that the MUTCD provides sufficient and adequate GUIDANCE relating to the determination of pedestrian interval timing. Therefore, section R306.2 is recommended to be modified as shown:

R306.2 Pedestrian Signal Phase Timing. All pedestrian signal phase timing shall comply with section 4E.06 of the MUTCD (incorporated by reference, see R104.2) ~~and shall be based on a pedestrian clearance time that is calculated using a pedestrian walking speed of 1.1 m/s (3.5 ft/s) or less.~~

In the event that the immediately prior NCUTCD recommendation is not accepted and a pedestrian walking speed of 3.5 feet per second or less becomes a requirement rather than guidance, the NCUTCD recommends that additional language as shown below be included in Section R306.2. While this is not the alternative preferred by the NCUTCD, the NCUTCD feels this is preferable to the language in the proposed guidelines if the primary recommendation is not accepted.

R306.2 Pedestrian Signal Phase Timing. All pedestrian signal phase timing shall comply with section 4E.06 of the MUTCD (incorporated by reference, see R104.2) and shall be based on a pedestrian clearance time that is calculated using a pedestrian walking speed of 1.1 m/s (3.5 ft/s) or less except that a walking speed of up to 4 feet per second may be used to evaluate the sufficiency of the pedestrian clearance time at locations where an extended pushbutton press function has been installed to provide slower pedestrians an opportunity to request and receive a longer pedestrian clearance time. Passive pedestrian detection may also be used to automatically adjust the pedestrian clearance time based on the pedestrian's actual walking speed or actual clearance of the crosswalk.

4. The term "pedestrian activated signal", as used in Section R306.3.2 and other places in the guidelines, is somewhat ambiguous. Specifically, it is the use of the term "signal" that is unclear. A traffic control signal, a pedestrian hybrid beacon, or a different type beacon can each be pedestrian activated. However, each of these devices looks and operates quite differently from the others. If the intent of the guidelines is to allow the use of any of these, no change is necessary although clarification would be beneficial.

The NCUTCD has assumed that the intent is that either a traffic control signal (providing red-yellow-green vehicular indications) or a pedestrian hybrid beacon (providing yellow and red vehicular indications) is intended. There are other beacons that flash yellow indications. These other beacons themselves do not require vehicular traffic to stop although the presence of a pedestrian crossing or preparing to cross in a crosswalk may require an approaching driver to stop or yield. These other beacons are highway traffic signals but are not traffic control signals as these terms are used in the MUTCD.

The R302.3.2 Advisory indicates that pedestrian hybrid beacons can be used at roundabouts. The NCUTCD therefore assumed that a pedestrian hybrid beacon is one of the acceptable devices intended to be considered a "signal" to satisfy the requirement of this section.

Based on these assumptions, the NCUTCD recommends that Section R306.3.2 be modified to clarify the intent of "pedestrian activated signal" as shown. Furthermore, the NCUTCD recommends that each use of "pedestrian activated signal" be reviewed on a case-by-case basis to determine whether that term, the term "pedestrian activated traffic control signal or pedestrian hybrid beacon", or another term should be used. A search indicates 23 occurrences of "pedestrian activated signal" and it appears that each should be replaced with

the term “pedestrian activated traffic control signal or pedestrian hybrid beacon” or another clarifying term.

R306.3.2 Pedestrian Activated Signals. At roundabouts with multi-lane pedestrian street crossings, a pedestrian activated [traffic control](#) signal [or a pedestrian hybrid beacon](#) complying with R209 shall be provided for each multi-lane segment of each pedestrian street crossing, including the splitter island. Signals shall clearly identify which pedestrian street crossing segment the signal serves.

Advisory R306.3.2 Pedestrian Activated Signals. Roundabouts with single-lane approach and exit legs are not required to provide [a](#) pedestrian activated [traffic control](#) signals ~~or a pedestrian hybrid beacon~~. ~~A P~~ pedestrian activated [traffic control](#) signals ~~or a pedestrian hybrid beacon~~ must comply with the requirements for accessible pedestrian signals and pedestrian pushbuttons (see R209). Pedestrian activated [traffic control](#) signals [or pedestrian hybrid beacons](#) installed at splitter islands should be carefully located and separated so that signal spillover does not give conflicting information about which pedestrian street crossing has the WALK indication displayed. Pedestrian Hybrid Beacons can be used at roundabouts (see MUTCD sections 4F.01 through 4F.03). Pedestrian Hybrid Beacons are traffic signals that consist of a yellow signal centered below two horizontally aligned red signals...

5. The NCUTCD noted that Section R306.5 only applies to intersections that are signalized. Therefore, on the surface, this section would require that an additional movement, the pedestrian movement across a multi-lane turn “lane”, be signal controlled. However, a rigid interpretation of intersection could lead one to conclude that channelized right turns lanes near an intersection are not included in the intersection and therefore introduce some ambiguity as to whether the channelized turn lane is “at” a signalized intersection.

The NCUTCD feels the intent of the proposed guidelines is to consider locations where multi-lane channelized turn lanes exist as being “at” the nearby signalized intersection. The NCUTCD would urge that some clarification be made but the NCUTCD did not recommend a specific change or develop alternate language

R306.5 Channelized Turn Lanes at Other Signalized Intersections. At signalized intersections other than roundabouts with pedestrian street crossings, pedestrian activated signals complying with R209 shall be provided at pedestrian street crossings at multi-lane channelized turn lanes.

The NCUTCD appreciates the opportunity to review and comment on these proposed guidelines.

Respectfully submitted,

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