Hari Kalla, MUTCD Team Leader Federal Highway Administration 1200 New Jersey Ave, SE, Rm E84-316 Washington, DC 20590

Dear Mr. Kalla,

The following letter was drafted by the NCUTCD RW Signs Technical Committee and approved unanimously by the NCUTCD Council at their meeting January 9, 2009.

The 2003 Manual on Uniform Traffic Control Devices (MUTCD) included the requirement that W25-1 and W25-2 warning signs be installed adjacent to traffic signal heads at signalized intersections where the "yellow trap" situation can occur due to signal phasing. These two mandated warning signs are raising more questions on their use and application without supporting documentation that the use resolves the field problems.

Sections 4D.05 B4(c) and (d) require that an engineering study shall be done relative to the implementation of the signal phasing that requires the use of the signs and specifies that the signs be used. At the request of the Signals Technical Committee, the Regulatory and Warning Signs Technical Committee added these two signs to Section 2C.39, Traffic Signal Signs, covering the sign design and application.

The use of these two warning signs has raised a number of questions relative to need, driver comprehension, and consistent application in the field. There are specific concerns that the sign legends provide no positive warning message to the motorist.

It is requested that documentation be provided supporting the justification, application, and motorist understanding of the current sign messages. Since a traffic engineering study is required, the issues addressed in the study as part of the documentation would help clarify the sign requirements, comprehension, and applications.

It is recognized that the signal modifications to avoid the "yellow trap" and resulting sign usage are not physically and economically feasible for all intersections. It would also be appreciated if those limitations were addressed in the above requested documentation.

A number of other sign legends have been suggested but not explored relative to appropriate meaning, application, comprehension, and driver response. If the existing sign messages cannot be justified, it is recommended that the appropriate research be conducted to resolve any issues of driver comprehension and response to other various possible sign legends.

Sincerely,

Robert M. Garrett, Executive Secretary NCUTCD