



March 26, 2020

Rules Docket Clerk
Office of Secretary
U.S. Department of Transportation
1200 New Jersey Avenue SE
Washington, DC 20590

RE: Docket No. DOT-OST-2019-0179. FR Doc. 2020-02332. Notice of Comments: Ensuring American Leadership in Automated Vehicle Technologies posted 02/06/2020.

Dear Rules Docket Clerk:

The American Traffic Safety Services Association (ATSSA or the Association) is pleased to submit the following comments regarding the Docket No. DOT-OST-2019-0179. The association is a 501(c)(6) trade association that represents the manufacturers and installers of roadway safety infrastructure devices as well as numerous public agencies on both the state and local levels. ATSSA's Core Purpose is To Advance Roadway Safety and eliminate all roadway fatalities. Our members are on the front lines in temporary traffic control zones and the invention, manufacture, sale and installation of most of the traffic control devices used on our nation's roadways.

First, ATSSA would like to thank the Office of the Secretary of Transportation (OST) for the opportunity to comment on this rapidly changing topic of automated vehicles. We would like to commend OST for addressing the constantly changing technologies associated with automated vehicles that will shape the future over the next 5, 10, 20 years and beyond. Additionally, we would like to thank OST for continuing the advancement of an updated Manual on Uniform Traffic Control Devices (MUTCD) as this is a critical document that the industry uses on a daily basis to keep our industry safe as well as the driving public. One element to include in the update of the MUTCD is the technology that AVs use to identify infrastructure components. We understand that OST will not choose a technology; however, standards are needed for what minimum infrastructure component can be read based on this type of technology. Two examples are pavement markings and signs. Each manufacturer may have a different approach for making these product components. However, AVs need to be able to read these devices equally because currently today there are not minimum national standards for these two examples.

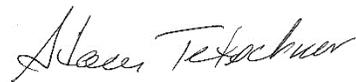
As a leader in the road safety industry, ATSSA was the very first membership association to support the nationwide Toward Zero Deaths (TZD) initiative. The TZD national strategy on highway safety calls for all stakeholders to champion the effort with deliberate action. With the notion that one death is too many, we all must move the message forward to bring down the number of annual deaths...to zero. Many organizational stakeholders, along with ATSSA, understand our vital role as a conduit for change. A collaborative effort is needed, through the public and private sector, to push the initiative in a way that evokes emotion and induces action.

We feel that balancing safety and innovation will be key to ensure that private industry and government sustain a safe transportation system because in the beginning stages there may be an increase in overall fatalities with these types of vehicles.

The industry continues to develop knowledge and understanding of how automated vehicles interact with the physical roadway infrastructure, just as the automotive industry develops knowledge of how traffic control devices can improve computer vision. We appreciate that FHWA will use current research to supplement knowledge on the capabilities of different sensor and machine vision systems in interpreting traffic control devices. We encourage FHWA to consider future research, both public and private, being conducted to build upon current knowledge and understanding in a rapidly evolving field. We also encourage FHWA to consider research, testing and pilot projects being conducted at state and local agencies concentrating on innovative infrastructure technologies that support the safe and efficient operation of automated vehicles.

As an industry, we are strongly encouraged to see a focus on safety as well as the removal of barriers to innovation. We encourage OST to work with industry leaders, including ATSSA, as we support advances in roadway safety and the elimination of all roadway fatalities.

Thank you,



Stacy Tetschner, CAE, FASAE
President and CEO