



U.S. Department  
of Transportation

**Federal Highway  
Administration**

400 Seventh St., S.W.  
Washington, D.C. 20590

February 3, 2006

In Reply Refer To: HOTO-1

Mr. Fred M. Greenberg  
Director of Traffic Services – New England  
B L Companies  
355 Research Parkway  
Meriden, CT 06450

Dear Mr. Greenberg:

Thank you for your November 16, 2005, letter requesting an official interpretation of the term "integral" as used in Section 4E.04 of the Manual on Uniform Traffic Control Devices (MUTCD). You asked whether pedestrian signal indications designed with fiber optic or light emitting diode (LED) light sources, with the upraised hand and the walking person symbol indications overlaid on each other, are compliant with the intent of language in Section 4E.04.

The specific language in Section 4E.04 states: "The UPRAISED HAND (symbolizing DON'T WALK) signal section shall be mounted directly above or integral with the WALKING PERSON (symbolizing WALK) signal section." Also, Figure 4E-1 illustrates "Typical Pedestrian Signal Indications," showing designs with one section and two sections. The illustration of the one section design shows the upraised hand and walking person indications side-by-side within one signal section, but it does not illustrate a design in which the two symbols are overlaid on each other within one signal section.

The intent of the language in Section 4E.04 allowing the upraised hand indication to be "integral with" the walking person is to provide an alternative to the two-section design that would otherwise be required. Dictionaries define the word "integral" in a sense of wholeness, completeness, being a part of a whole unit, etc. Figure 4E-1 illustrates a "typical" one-section design but is not meant to limit such designs to only the one that is illustrated. Other designs in which the upraised hand and walking person indications are both contained within one pedestrian signal section would also be "integral" and are not prohibited.

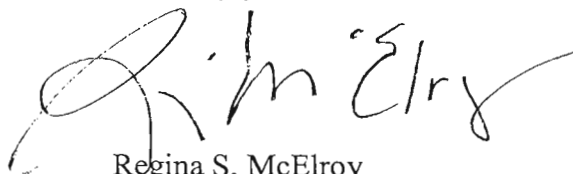
Your letter correctly notes that "overlaid" designs have been in use for many years with fiber optic and LED light sources that can illuminate each symbol independently. As long as a manufacturer's product properly displays the individual upraised hand and walking person



indications, visible as distinctly separate indications meeting all other requirements (color, size, shape, luminous intensity, etc.), the light sources comprising the indications may be overlaid on each other or they may be side-by-side.

Thank you for writing on this subject. If you have any questions, please feel free to contact Mr. Wainwright at [scott.wainwright@fhwa.dot.gov](mailto:scott.wainwright@fhwa.dot.gov) or call him at 202-366-0857. Please note that we have assigned your request the following official interpretation number and title: "4-303(I)—Overlaid Pedestrian Signal Symbols." Please refer to this number in any future correspondence on this matter.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Regina S. McElroy". The signature is fluid and cursive, with the first name "Regina" being the most prominent part.

Regina S. McElroy  
Director, Office of Transportation  
Operations

FHWA:HOTO-1:SWainwright:ds:60857:1-31-06

cc: HOTO-1 HOTO-1(HKalla/SWainwright)

Mr. Martin Knopp, HRC-MW Mr. Pat Hasson, HRC-MW

HDA-CT(2) Mr. Roger Wentz, ATSSA Mr. Jim Baron, ATSSA

Mr. Carl Andersen, TFHRC Mr. Bruce Friedman, Kimley-Horn & Assoc.

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DF(4-303(I)—Overlaid Pedestrian Signal Symbols)

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November 16, 2005

Federal Highway Administration  
Office of Transportation Operations (HOTO)  
400 7th Street SW  
Washington, DC 20590

RE: Request for Interpretation  
MUTCD

Dear Sir or Madam:

Section 4E.04 of the MUTCD states that "The UPRAISED HAND (symbolizing DON'T WALK) signal section shall be mounted directly above or integral with the WALKING PERSON (symbolizing WALK) signal section. Figure 4E-1 shows typical pedestrian signal indications.

I would like clarification as to whether the term "integral" prohibits the use of indications where the UPRAISED HAND and WALKING PERSON are "overlaid" on each other. This type of arrangement was commonly used with fiber optic and LED indications and is still commonly sold. Figure 4E-1 does not show this type of arrangement.

Very Truly Yours,

**BL COMPANIES**

A handwritten signature in black ink, appearing to read 'Fred M. Greenberg'. The signature is written over the printed name and title below it.

Fred M. Greenberg, P.E.  
Director of Traffic Services – New England

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