



U.S. Department  
of Transportation

**Federal Highway  
Administration**

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

April 4, 2005

Refer to: HOTO-1

Mr. Marshall L. Doney  
Vice President  
Automotive Services  
American Automobile Association  
607 14<sup>th</sup> Street, NW., Suite 200  
Washington, DC 20005

Dear Mr. Doney:

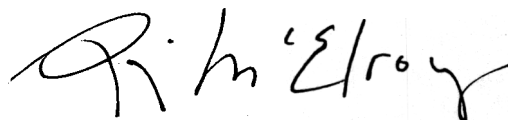
Thank you for your October 8, 2004, joint letter with Ms. Susan G. Pikrallidas requesting an interpretation of revisions in the 2003 Edition of the Manual on Uniform Traffic Control Devices (MUTCD) that address the safety apparel required of student patrols. At your request, Mr. Ernie Huckaby and Ms. Guan Xu of my staff met with your staff on November 9, 2004, to discuss the issues in your letter. The information below is provided as a followup to our meeting.

The first question in your letter addresses the cross-reference in a new Standard statement in Chapter 7E that refers to Chapter 6E for ANSI 107-1999, Class 2 and Class 3 requirements for retroreflective safety apparel. This cross-reference is an error. The ANSI 107-1999 standard performance for Class 1 is the required retroreflective safety apparel for use in school zones. Please also be advised that a 5-year compliance period is established in the MUTCD for this requirement to minimize economic impact on the States and local jurisdictions.

Another issue raised in your letter is the design of the safety apparel for student patrols. We understand that the safety belt design provides an important distinction between the student patrols and the adult crossing guards. Because your organization believes that the belt (instead of the vest) is the proper and safe apparel for student patrols, we suggest that you develop a type of student patrol belt that would have similar characteristics to the ANSI Class 1 standard for safety apparel visibility. Once you have developed a proposed design for the safety patrol belt, please submit the design to our office for review. Based on your proposal, we can consider revising the MUTCD to specifically address safety patrol belts.

We appreciate you bringing these issues to our attention and look forward to working with you to create safer school zones. For purposes of recordkeeping, we have numbered and titled this interpretation as "7-67(I)—Safety Apparel for Student Patrols – AAA." Please refer to this number in any future correspondence. If you have any questions, please call Ms. Xu at 202-366-5892.

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.

Regina S. McElroy  
Director, Office of Transportation  
Operations

cc: Ms. Susan G. Pikrallidas

cc: Mr. Jim Baron, ATSSA



Washington Office  
607 14th Street, N.W. Suite 200  
Washington, D.C. 20005  
202/942-2050  
FAX 202/783-4788

October 8, 2004

Ms. Regina McElroy  
Director of Transportation Operations  
Federal Highway Administration  
400 Seventh Street, S.W.  
Washington, D.C. 20590

Dear Ms. McElroy:

On behalf of AAA, we are writing to seek an interpretation of revisions in the Manual on Uniform Traffic Control Devices (MUTCD) that address the safety apparel required of student patrols.

AAA, an organization dedicated to promoting traffic safety, founded the AAA School Safety Patrol Program in 1920. Today, the program is a legacy of the association's commitment to community-based traffic safety programs and remains one of the most visible volunteer traffic safety initiatives in the country. Each year approximately 500,000 young people volunteer in some 50,000 schools nationwide to help foster a safe environment for elementary age children going to and from school.

In reviewing the impact of the revisions to the 2003 MUTCD, it is apparent that further interpretation is needed to ensure that these young people are wearing appropriate safety apparel that clearly distinguishes their role within parameters consistent with the level of activity in which they are engaged. The existing MUTCD requirements are unclear on this point.

Chapter 7E addresses requirements associated with "Crossing Supervision." Subsection 7E.04 states: "Student patrols shall wear high-visibility retroreflective safety apparel labeled as ANSI 107-1999 standard performance for Class I ~~as described in Section 6E-02.~~" That cross reference leads to a discussion of requirements for Classes 2 and 3 exposures – a different set of requirements for individuals whose risk exposure is much greater than that of a student patrol.

Workers in Classes 2 and 3 are trained to assist in traffic situations considered medium to high risk levels with high traffic volume. Activities include assisting law enforcement in work zone safety areas, averting traffic from a crash scene and assisting emergency response personnel. The responsibility level and performance standards between Class 1, as opposed to Classes 2 and 3 vary greatly; yet that distinction is unclear in the discussion of appropriate apparel for student patrols. That is the reason why further clarification is necessary.

In almost all school districts student patrollers are identified by the official "Sam Browne belt" to which a badge is pinned to the shoulder strap. The Patrol Belt very visibly signifies a young student performing a specific set of duties – important responsibilities, but not those performed by adults. In fact, it can be safely stated that every generation of driver now operating on our roadways has been conditioned to correlate the presence of a young person wearing a "Sam Browne" belt with children walking to and from

schools. These belts alert motorists traveling through a *school zone* that they should expect increased pedestrian traffic and slow down accordingly.

Specific functions for safety patrollers are outlined in a program guide provided by every participating school district. Patrollers *do not direct traffic*. Only police officers or adult crossing guards can stop vehicles. Patrollers are on the sidewalk, on school buses, or within school buildings. The level of risk is substantially different than other individuals within Class 1 whose duties place them in potentially more dangerous interface with oncoming traffic.

AAA believes there are important safety benefits that derive from maintaining this distinction. We risk confusing the public if young people are required to wear the same safety apparel as an adult performing more risky tasks. We are also unaware of any research to indicate that school patrols are in more danger while wearing a school safety patrol belt, as opposed to the total amount of coverage now potentially required by the MUTCD, based upon how its revisions are interpreted.

As previously stated, AAA views the school safety patrol program as one of its most important community-based traffic safety programs. We have established procedures to guide local officials who utilize the program. At no time, would we endanger the lives of young safety patrollers; indeed the evidence of any young person being injured or killed as a result of their patrol activities is almost non-existent. That is because we take great care to ensure that these young people are properly trained as to their responsibilities, and the public is attuned to the fact that it is a young person they see on the side of the road – not an adult.

Over the years, AAA has adapted the color of its traditional belt to utilize the latest in retroreflective materials. As new materials are developed, we are more than willing to incorporate those materials into the belt. Absent research to the contrary, we believe it important to maintain the traditional safety patrol belt as the principal identifier of these young people. In a handful of jurisdictions around the country, observance of state laws or local ordinances might require adherence to a different standard for student patrollers. AAA typically works with those jurisdictions to mitigate the impact of these different standards on student patrol operations. If the current MUTCD standard is interpreted to require different apparel for school safety patrollers and becomes widely applied across the land, AAA would not have the resources to address the problems that would surely arise in distinguishing student patrollers from adults performing much riskier duties.

Therefore, we urge FHWA to provide a written interpretation of the MUTCD standard as applied to school safety patrols. We request a meeting with you and your associates to discuss this issue in more detail. We're confident that once the duties of a student patroller and our reasons for believing the traditional belt provides an important safety identifier are fully understood, you will reach the same conclusion.

Thank you for your consideration of our request. A member of our Washington, D.C. based staff will be in touch with you to schedule a meeting.

Sincerely,



Marshall L. Doney  
Vice President  
Automotive Services



Susan G. Pikrallidas  
Vice President  
Public Affairs