



U.S. Department
of Transportation
**Federal Highway
Administration**

SEP 18 2012

1200 New Jersey Ave., SE
Washington, D.C. 20590

In Reply Refer To:
HOTO-1

Eagan L. Foster, P.E., PTOE
Traffic Signal Engineer
Engineering
City of Dublin
5800 Shier Rings Road
Dublin, Ohio 43016

Dear Mr. Foster:

Thank you for your letter of June 28 requesting an official interpretation of the 2009 Manual on Uniform Traffic Control Devices (MUTCD) regarding the retroreflectivity requirements for Traffic Signal Pedestrian and Bicycle Signs (R10-1 through R10-4, and R10-24 through R10-26).

The retroreflectivity requirements for signs are defined by the following text in the MUTCD:

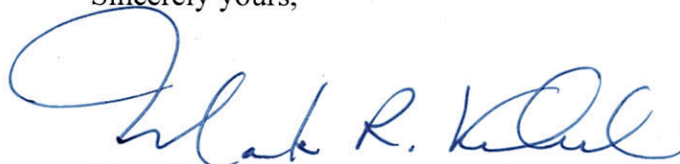
- Section 2A.07 states that regulatory, warning, and guide signs and object markers shall be retroreflective or illuminated to show the same shape and similar color by both day and night, unless otherwise provided in the text discussion in this MUTCD for a particular sign or group of signs. The requirements for sign illumination shall not be considered to be satisfied by street or highway lighting.
- Section 2A.08 states that Highway agencies may exclude the following signs from the retroreflectivity maintenance guidelines: Parking, Standing, and Stopping signs (R7 and R8 series), Walking/Hitchhiking/Crossing signs (R9 series, R10-1 through R10-4b), acknowledgment signs, all signs with blue or brown backgrounds, and bikeway signs that are intended for exclusive use by bicyclists or pedestrians.
- Section 2B.01 states that regulatory signs shall be retroreflective or illuminated.
- Section 9B.01 states that all signs shall be retroreflectorized for use on bikeways, including shared-use paths and bicycle lane facilities.

The intention of the MUTCD language cited above is that regulatory, warning, and guide signs shall be retroreflective, including signs for use on bikeways such as shared-use paths. The signs listed in Section 2A.08 may be excluded from the retroreflectivity maintenance guidelines, but the section does not exclude the signs from the retroreflectivity requirements. Therefore, Traffic Signal Pedestrian and Bicycle Signs (R10-1 through R10-4, and R10-24 through R10-26) are required to be retroreflective. Please note that some of the ambient light in the vicinity of the

sign will be reflected back to pedestrians, thus making the signs more visible to pedestrians during nighttime hours, which will assist them in locating the pushbuttons.

We trust that this interpretation is helpful. If you have any questions, please contact Mr. Eric Ferron of our staff by e-mail at eric.ferron@dot.gov or by telephone at 720 963 3206. Please note that we have assigned your request the following official interpretation number and title: 2(09)-43 (I) - Retroreflectivity Requirements for Traffic Signal Actuation Signs – Dublin, OH." Please refer to this number in any future correspondence.

Sincerely yours,

A handwritten signature in blue ink, appearing to read "Mark R. Kehrli". The signature is fluid and cursive, with a large initial "M" and "K".

Mark R. Kehrli
Director, Office of Transportation
Operations