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The Honorable Shailen Bhatt
Administrator
Federal Highway Administration
1200 New Jersey Avenue SE
Washington, DC 20503

Dear Administrator Bhatt:

The Federal Highway Administration (FHWA) has identified 28 countermeasures as part of the Proven Safety Countermeasures initiative (PSCi). The main categories for these measures are speed management, pedestrians/bicyclists, roadway departures, intersections, and crosscutting (i.e., countermeasures that touch more than one category).

The American Traffic Safety Services Association (ATSSA) commends FHWA for the PSCi program, as it is consistent with our goals and objectives. Each of these countermeasures is critical in providing direct, easy-to-understand education and information on how to make our roads safer. States, cities, counties, native nations, and other agencies that own and operate roads need to consider embracing each of these countermeasures so their roads can be safe for ordinary travel. If they do not, they are likely not meeting the expected standard of care for road safety to help prevent or reduce the severity of crashes, with the goal of achieving zero fatalities by using the Safe System approach.

With that in mind, ATSSA would like to ask FHWA to consider expanding the PSCi program to be more inclusive of other potential countermeasures that complement the 28 existing countermeasures. Two such areas are red-light running management (RLRM) and red-light indicator lights (RLILs).

A majority of urban accidents occur at signalized intersections, where a significant number involve drivers disregarding red lights, leading to severe injuries and fatalities. Research has shown that RLRM and RLIL can result in a significant reduction in serious injuries and fatalities, both with and without enforcement. The key element is raising driver awareness red-light running enforcement potential. Thus, given this potential safety benefit, we believe that FHWA should develop a countermeasure for this. We believe that FHWA Report No. FHWA-HRT-17-077, *Safety Evaluation of Red-Light Indicator Lights at Intersections*, provides an excellent starting point for that.

Additionally, we believe that FHWA should consider including guidance statements in the Manual on Uniform Traffic Control Devices (MUTCD) regarding the safety effectiveness of RLRM and RLIL and the 28 current countermeasures. Referencing the PSCi in the MUTCD is an excellent first step in transitioning the MUTCD from nominal safety to substantive safety.

Sincerely,

Stacy Tetschner
ATSSA President & CEO