

degussa.

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Röhm America LLC

2 Turner Place
Piscataway, NJ 08855

Direct: 732-981-5337
Fax: 732-981-5484

borys.schafran@degussa.com
www.rohmamerica.com

Ms. Regina S. McElroy
Director, Office of Transportation Operations
U.S. Department of Transportation
Federal Highway Administration
400 Seventh Street SW
Washington, DC 20590

Re: 3-174(l) – Continuous Line Segment Determination

Dear Ms. McElroy:

Thank you for your letter of December 23, 2004 detailing FHWA's current interpretation of the PATHFINDER® safety marking with regard to MUTCD.

We realize that this novel product based on our DEGAROUTE® methacrylate resin binders is a bit of a square peg in the round hole of MUTCD regulations, yet it clearly represents the advancement of road marking technology. We certainly agree with your statement that "...a line that gives the unambiguous appearance of being solid (as opposed to dotted) to road users could probably be considered a solid line for MUTCD purposes..."

We are currently investigating the sponsorship of research on this subject using U.S. drivers, vehicles and roads and will report back to you on our progress.

However, before we commission a formal study, I would like to have your feedback on these comments made after internal discussions and consultation with industry colleagues:

- Non-retroreflective raised pavement markers are often used in multiples with a leading retroreflective marker to delineate a skip line on pavements in rainy climates (ref. Section 3B.14). These are not continuous markings.
- Perhaps the 30 meter geometry used for measuring retroreflectivity should also be the vantage point for the driver's assessment of a marking as continuous or otherwise. Under such a scenario, PATHFINDER markings will appear to be continuous.

Thank you again for your consideration. Please note that my colleague, Mr. Tom Wickett, has recently retired from Degussa, so I kindly ask that you direct any correspondence or calls to my attention.

Sincerely,



Borys Schafran
Sales & Marketing Manager
Road Marking and Casting Resins

cc: G. Schmitt/Degussa
S. Wainwright/FHWA