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In Reply Refer To: HOTO-1

Mr. Richard M. Campbell President CTC Incorporated 6100 Southwest Boulevard, Suite 500 Fort Worth, TX 76109-3985

Dear Mr. Campbell:

Thank you for your letter of October 10 requesting an official interpretation regarding the required positioning of signal faces at pre-signals.

The two questions that you specifically asked in your letter are: 1) whether the signal faces for a pre-signal are considered to be primary signal faces as specified in Item A of Paragraph 1 in Section 4D.11, and 2) is the 40-foot minimum distance specified in Item A1 of Paragraph 1 in Section 4D.14 applicable to signal faces for a pre-signal.

The basic question being asked in your letter is whether the approach to a pre-signal is considered to be a part of the approach to the downstream signal or is it an independent approach from the approach to the downstream signal. Because the signal indications being displayed at the pre-signal are not always the same as the signal indications being displayed at the downstream signal, the approach to the pre-signal is an independent approach and the signal faces for the pre-signal would be considered to be primary signal faces as specified in Item A of Paragraph 1 in Section 4D.11. In contrast to this, near-side signal faces associated with the downstream signal that always simultaneously display the same signal indications as the downstream signal would be considered to be a part of the approach to the downstream signal and would be considered to be supplemental signal faces rather than primary signal faces.

When road users are stopped by the display of red signal indications at the pre-signals, they need to be able to see at least one signal face from the stop line so that they know when it is appropriate to proceed again on a green signal indication. Because the signal faces at the downstream signal display different signal indications than the pre-signal signal faces, road users who are waiting at the stop line cannot use the signal faces at the downstream signal to determine when it is appropriate to proceed again.

It is the FHWA's official interpretation that the requirements for signal face positioning at a presignal are governed by the same provisions as any other independent approach to a signal. This means that the provisions in Sections 4D.11 through 4D.14 regarding the number of signal faces, the visibility and aiming of the signal faces, and the lateral and longitudinal positioning of the signal faces apply separately to the approach to the pre-signal.

If the requirement to locate at least one of the signal faces for the pre-signal at least 40 feet from the stop line results in the signal face being located on the far side of the track(s), that is acceptable. If this signal face is not visible when a train is occupying the crossing, the presence of the train and the active devices (flashing-light signals and/or gates) at the crossing will keep the road users stopped at the stop line until the train has cleared the crossing, at which point the signal face for pre-signal will be visible again.

For recordkeeping purposes, we have assigned the following official ruling number and title: "8(09)-19 (I) – Positioning of Signal Faces at Pre-Signals." Please refer to this number and title in any future correspondence regarding this topic.

Thank you for your interest in improving the clarity of the provisions contained in the MUTCD.

incerely yours,

Mark R. Kehrli

Director, Office of Transportation

Operations