



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

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

OCT 11 2017

In Reply Refer to:
HOTO-1

Mr. Chris J. Herrick
Kansas Department of Transportation
700 S.W. Harrison Street
Topeka, Kansas 66603

Dear Mr. Herrick:

Thank you for your recent request for official interpretation of the provisions of the *Manual on Uniform Traffic Control Devices for Streets and Highways* (MUTCD). Specifically, you asked whether the MUTCD provides for the display of a pictograph on a General Information sign that identifies the boundary of a geographical area. The pictographs would be those of the National Park Service (NPS) and/or the Freedom's Frontier National Heritage Area (NHA), Inc.

The NPS has requested that its graphical identification be displayed on signs identifying the limits of the Freedom's Frontier NHAs on Interstate and other freeways. The NPS states that the purpose is to bring "sign consistency" to this national program and that the request is made for "uniformity sake." In addition, the NPS also supports the display of separate pictographs to represent each individual NHA on these signs, for a total of two pictographs displayed on each sign.

The NPS refers to its graphical identification—the "arrowhead"—as a "logo." The MUTCD defines the term "logo" as "a distinctive emblem or trademark that identifies a commercial business and/or the product or service offered by the business." The term is used almost exclusively in the MUTCD to refer to those graphics shown on Specific Service signs for qualifying businesses offering motorist services or on Tourist-Oriented Directional signs for qualifying businesses whose patrons are primarily tourists. For the purposes of traffic signing, per MUTCD definition, the NPS "arrowhead" is classified as a pictograph: "a pictorial representation used to identify a governmental jurisdiction, an area of jurisdiction, a governmental agency, a military base or branch of service, a governmental-approved university or college, a toll payment system, or a government-approved institution." The subject graphic identifies the NPS as a governmental agency.

In addition to defining what a pictograph is, the MUTCD also defines the specific signs on which pictographs may be displayed. They are allowed only on the following signs, and within certain limitations depending on the sign type to which it is applied:

- Street Name Signs, governmental (political) jurisdiction pictograph
- Park–Ride Signs, local transit system pictograph
- Community Wayfinding Signs, neighborhood identification pictograph
- Supplemental Guide sign, governmental agency, military, university, or other government-approved institution pictograph, in conjunction with the destination name; except for pictographs representing a State, county, or municipal corporation or other incorporated or unincorporated community
- Toll facility signs, electronic toll collection account pictographs
- Political Boundary General Information sign, governmental (political) jurisdiction (State, County, or municipal corporation) pictograph
- Acknowledgment signs, State or local agency pictograph
- 511 Travel Information sign, 511 pictograph
- Carpool and Rideshare Information signs, local transit system pictograph
- Bicycle Route sign, agency pictograph

The NPS states that the NHA signs are “boundary signs.” The MUTCD identifies two types of boundary signs: (1) signs identifying boundaries of political subdivisions (Political Boundary signs); and (2) signs identifying other jurisdictional boundaries (Miscellaneous Information signs). Because the NHA signs identify the boundaries of an area rather than of a political subdivision, these signs are considered Miscellaneous Information signs as they are “identifying control points for activities that are clearly in the public interest.” Of the two types of boundary signs, the MUTCD limits the inclusion of a pictograph to the Political Boundary signs. Section 2A.06 of the MUTCD states, “[p]ictographs...shall not be displayed on signs except as specifically provided in this Manual.”

The interpretation cited in your letter has been superseded by the 2009 edition of the MUTCD, which defines the purpose and use of pictographs with much greater specificity. The 2005 interpretation addressed Political Boundary signs. However, neither the NPS nor the NHA is a political jurisdiction.

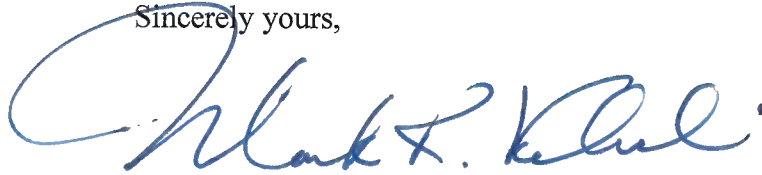
A human factors evaluation on pictographs was completed in 2011. In this study, it was found that due of their unique and detailed designs, pictographs primarily increased the amount of glance time directed toward a sign without the benefit of providing additional information beyond the word legend that is displayed on the sign. Accordingly, we expect that the current extent of the use of pictographs on signs will be re-evaluated in a future edition of the MUTCD.

For the purposes of highway signing, there is an expectation that some degree of trip planning will occur prior to travel. Signing to attractions is provided, in accordance with qualifying criteria, as a means of direction and confirmation to a destination. Therefore, legends beyond

the name of the destination, such as association with Federal, State, or local government agencies, are purely promotional in nature and generally not appropriate for signs. That is, the additional information serves no navigational function. Therefore, any promotional branding—whether affiliation with a governmental agency or otherwise—should occur on premise with the site identification sign, which is not a traffic control device.

For recordkeeping purposes, we have assigned your request the following Official Ruling number and title: “2(09)-136 (I) – Pictographs on Boundary General Information Signs—Kansas DOT.” Please refer to this number and title in future correspondence.

Sincerely yours,

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

Mark R. Kehrli
Director, Office of Transportation
Operations

cc: Mr. Eric Nichol, KDOT