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Dear Ms. Conroy:

Thank you for your recent series of emails to Mr. Scott Wainwright of our Manual on Uniform Traffic Control Devices (MUTCD) Team requesting an interpretation of paragraph 03 of Section 4E.10 of the 2009 edition of the MUTCD.

Section 4E.10 is entitled “Accessible Pedestrian Signals and Detectors – Location.” Paragraph 03 requires that, when two accessible pedestrian pushbuttons are placed less than 10 feet apart or on the same pole, each accessible pedestrian pushbutton shall be provided with certain features listed as items A through D. Item C is “a speech walk message for the WALKING PERSON (symbolizing WALK) indication” and item D is “a speech pushbutton information message.” You have questioned whether these requirements in items C and D are intended to apply to when exclusive pedestrian phasing is used and both crosswalks on the corner are controlled simultaneously by the same exclusive pedestrian phase.

The fast-ticking percussive tone has been found to be the best way to communicate the “Walk” message to visually impaired pedestrians when the accessible push buttons are located 10 feet or more apart. However, when accessible pushbuttons are placed less than 10 feet apart on an intersection corner, research has shown that visually impaired pedestrians cannot easily discern from percussive tones which crosswalk has the “Walk” indication and which does not, and it is only for this situation that a speech walk message is superior.

When an exclusive pedestrian phase is used at an intersection, and the pedestrian signals controlling the crosswalks on a given corner of the intersection both operate together such that the “Walk” indication is always simultaneous for both crosswalks, there is no need to use speech walk messages to distinguish between the crosswalks. A fast-ticking percussive tone emitted simultaneously from both pushbuttons located less than 10 feet apart will properly serve the needs of visually impaired pedestrians under those circumstances. Therefore, it is our official
interpretation that item C of paragraph 03 in Section 4E.10 is not intended to apply to this situation.

Regarding item D, the purpose of requiring a speech pushbutton information message when the accessible pushbuttons are less than 10 feet apart is also to provide unambiguous information to visually impaired pedestrians for the two crosswalks, but specifically when the “Walk” indication is not timing. Such speech information messages are in the format of “Wait. Wait to cross Broadway at Grand.” For the same reasons as outlined above regarding item C, it is our official interpretation that item D of paragraph 03 in Section 4E.10 is not intended to apply when the pedestrian signals for both crosswalks on a corner operate concurrently with each other.

However, it should be noted that there are other types of speech information messages that, per paragraph 09 of Section 4E.13, may be used and in fact could be particularly useful to visually impaired pedestrians when exclusive pedestrian phasing is provided. That paragraph mentions exclusive pedestrian phasing and diagonal crosswalks as conditions that might favor the use of a speech information message to inform visually disabled pedestrians about these relatively unusual conditions. We encourage consideration of such speech information messages or other means (such as Braille) to communicate this information at locations with exclusive pedestrian phasing.

Thank you for writing on this subject. We hope that our interpretations answer your questions. For the next edition of the MUTCD, we will consider proposing revisions to the Section 4E.10 to more clearly and accurately reflect the intended application of provisions such as those you questioned. If you have any questions, please contact Mr. Wainwright by e-mail at scott.wainwright@dot.gov or by telephone at 202-366-0857. Please note that we have assigned your request the following official interpretation number and title: "4(09)-3(I)—APS with Exclusive Pedestrian Phase." Please refer to this number in any future correspondence regarding this issue.

Sincerely yours,

Mark R. Kehrli
Director, Office of Transportation Operations