

appropriate signing policies; [and] Investigating alternative approaches to speed control (signing, stripping, channeling, barriers, speed undulations, etc.)."

The agencies note that the guideline already emphasizes the important contribution of traffic engineering to the setting of speed limits. The sections on Program Management, Setting of Speed Limits, and Legislation stress the role of the "traffic engineer," "traffic personnel," and "engineering investigations" in that process. However, we agree that it is appropriate for the Training section to contain a similar emphasis, and have adopted CHP's proposed language. The agencies have not adopted West Virginia's suggestion to include a statement that enforcement funding be preceded by engineering evaluations of existing speed limits. To do so would hinder enforcement efforts, based on a blanket presumption that existing speed limits are not reasonable. The agencies are neither willing to accept that presumption nor to place conditions on enforcement efforts, which we view as a vital tool for effective speed control.

CHP thought the guideline was too detailed, in recommending under the section on Training that law enforcement officers escort and assist traffic engineers and technicians in the deployment of speed measuring equipment. CHP viewed such escort and assistance as an operational courtesy, and inappropriate for inclusion in a Federal guideline. In contrast, the National Sheriff's Association thought that training law enforcement officials in speed measurement was "critical." CHP also commented that "new" technology is over-emphasized in the guideline. Citing the introductory paragraph's use of the term "state-of-the-art equipment" for setting and enforcing speed limits and a similar "emphasis" in other sections, CHP argued that the emphasis should instead be placed on "appropriate technology," whether it is new or traditional, because some new techniques are unproven.

The agencies agree with the National Sheriff's Association that training of law enforcement officials is important. We do not agree with CHP's view of the recommendation that law enforcement officers escort and assist traffic engineers in deploying speed measuring equipment. This is not a courtesy, but rather a training experience to provide officers with a broad-based familiarity with speed measurement devices. Consequently, the guideline retains the recommendation, but the reference to "escorting" has been deleted to remove any ambiguity. With respect to CHP's

comment about "new" technology, the introductory paragraph of the guideline, in fact, urges the use of "both traditional methods and state-of-the-art equipment." Moreover, the section on Technology exhorts the States to use only equipment "that is approved or recognized as reliable." The agencies believe that the guideline affords full flexibility, as written, for the use of technology that is appropriate under the circumstances, while accommodating prospective advances in the state of the art. Consequently, we have not adopted CHP's comment.

CHP urged that the guideline devote more attention to speed variability and traveling at speeds unsafe for conditions. The International Association of Chiefs of Police (IACP) supported efforts to focus on speed variability as a cause of crashes, and endorsed the funding of variable message boards that adjust speed limits to conditions. In contrast, The Washington State Patrol thought that the adoption of variable speed limits would create enforcement problems because of motorist confusion, and the Minnesota Department of Transportation was concerned about liability incident to the posting of variable speed limits for prevailing conditions.

The agencies agree that the issues of speed variance and traveling at speeds unsafe for conditions deserve special attention, particularly from the standpoints of enforcement and education. Consequently, we have added specific references to these problem areas in the sections on Enforcement Program and Public Information and Education. The agencies believe that variable message speed limit signs can provide valuable safety benefits, and field evaluations have not disclosed concerns about liability or motorist confusion. The agencies will cooperate with State highway safety agencies to address any concerns that might arise. We have retained the references to these devices in the guideline, encouraging their use as a viable part of a comprehensive speed control program.

Advocates for Highway and Auto Safety (Advocates) suggested that the term "vigorous enforcement," which appears in the Enforcement Program section, be defined in terms of the qualities and characteristics that might comprise such an effort to better assist jurisdictions in carrying out enforcement campaigns. The agencies believe the term is unambiguous as stated—it conveys a high degree of effort. The qualities and characteristics of a comprehensive speed control

program are set forth throughout the guideline.

The New York City Police Department (NYPD) commented that more educational programs should be designed to raise public awareness of the hazards of speeding. The NYPD thought this could be best accomplished by starting with students during their freshman year in high school. The Washington State Department of Health recommended that language concerning bicyclists be included among the issues deserving attention in anti-speeding efforts under the Enforcement Program section. The agencies fully support increased educational efforts in this area, and particularly those directed at an age group that has been traditionally over-represented in highway injuries and fatalities. We believe that the Public Information and Education section of the guideline fully accommodates NYPD's interest in expanding educational efforts concerning the hazards of speeding, and therefore no changes have been made to the guideline. The agencies have adopted Washington's comments concerning bicyclists, and have included a reference in the Enforcement Program section.

The Washington State Patrol commented that the use of photo radar technology and VASCAR, as identified in the Enforcement Program and Technology sections of the guideline, is not approved under current State statutes. Washington identified aerial speed enforcement as a viable alternative to VASCAR. The Minnesota Department of Transportation thought that the Program Management section was too prescriptive. Minnesota did not articulate any reasons for its view, but sought a less "rigid framework." The agencies have made no change to the guideline, because it does not compel the use of a particular technology or framework. States have the flexibility to choose among the different strategies contained in the guideline in implementing speed control programs, according to their needs and particular circumstances.

A number of commenters expressed concerns about the National Maximum Speed limit. One commenter urged the repeal of the National Maximum Speed Limit (NMSL). Another commenter complained that in the guideline's section on Legislation, the NMSL was specifically excluded from those speed limits that need to be "realistic." Yet another commenter urged renewed focus on the NMSL at the national level, because of a perceived erosion in voluntary compliance. The NMSL is governed by statute, and it is not within