

NATIONAL MOTORISTS ASSOCIATION

Empowering Drivers Since 1982

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March 7, 2018

Ms. Heidi King, Deputy Administrator
National Highway Traffic Safety Administration
1200 New Jersey Ave, SE
Washington, DC 20590

Dear Ms. King,

The National Motorists Association (NMA) is deeply concerned that NHTSA continues to fund high visibility enforcement actions in Virginia (and most likely elsewhere) in zones where speed limits are posted dangerously below FHWA-recommended levels. We ask that NHTSA include the following basic mandate in its determination of state funding for such enforcement actions:

The use of federal grant money for speed enforcement shall be limited to roadways with speed limits that meet federal guidelines.

The Federal Highway Administration provides guidance to the states for posting safe speed limits in its *Manual of Uniform Traffic Control Devices*. The FHWA also makes available a computer program known as USLIMITS2 which helps engineers determine the safety-optimum speed limit that minimizes serious crashes.

An NMA colleague, Joe Bahen, P.E., has participated in the development of Virginia's past several five-year Strategic Highway Safety Plans (SHSP), including the current 2017 – 2021 version. During his discussions and correspondence with personnel from the Virginia Highway Safety Office (VAHSO), the Virginia Department of Transportation, the Virginia Department of Motor Vehicles, the Virginia State Police, and NHTSA's Region 3 Administrator as part of the SHSP process, he presented evidence of multiple Virginia speed zones that are posted significantly below USLIMITS2 criteria. Another thing these zones have in common is that NHTSA provides federal funding at each for ongoing speed enforcement actions. These activities constitute the very definition of a speed trap.

Mr. Bahen's attempts to add the basic safety requirement noted in the highlighted language above have fallen on deaf ears. Through VAHSO we understand that NHTSA's regional response to our recommendation was that requiring roadways to meet federal speed limit guidelines was not a consideration in the agency's decision making for awarding enforcement grants.

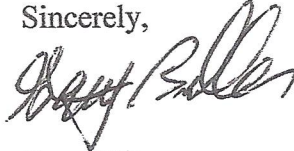
Administrator King, I ask you to reconsider. Speed limits posted below FHWA-recommended levels are dangerous, creating differential speeds in traffic flow that accentuate conflicts between drivers who travel safely with the prevailing flow of traffic and those who

(continued other side)

abide by the posted limit, even when it is well below the recognized norm. Braking, accelerating, quick lane changing, and irritated drivers become commonplace in these situations which creates conditions contrary to the government's role of protecting the safety of the public.

We would be happy to provide the Virginia data that show the funded enforcement action areas that are posted below FHWA standards. It is continued ticketing actions like those that sow distrust and disrespect between the driving public and law enforcement. Please have NHTSA take the lead by not funding enforcement operations where roadway regulations are below federal standards.

Sincerely,

A handwritten signature in black ink, appearing to read "Gary Biller". The signature is fluid and cursive, with the first name "Gary" being more prominent than the last name "Biller".

Gary Biller
President