

Santiago Corral, President
Patrick D. Jones, Executive Director

August 8, 2006

National Transportation Safety Board
490 L'Enfant Plaza, SW
Washington, DC 20594

Re: Safety Recommendation H-06-21

Dear Members of the Board:

The International Bridge Tunnel and Turnpike Association (IBTTA) is hereby responding to your letter and recommendation (H-06-21) of May 8, 2006

We concur with your observations concerning the growing use of toll financing, and with your recounting of the development and widespread implementation of Electronic Toll Collection (ETC) systems. Toll roads are garnering a great deal of interest and attention among cities, counties and states as self-financed transportation improvements.

Since the first use of electronic toll collection systems in 1989 the individual agency members of IBTTA have had a very complicated task of installing the hardware, building awareness and understanding of the systems among their customers, and altering their traffic flows to maintain and increase their traffic throughput. Each and every agency is very concerned about traffic safety and they expend enormous effort to protect their customers and their employees.

While a major hallmark of a toll facility is the toll plaza which all customers must pass through, there is a general expectation within the industry that these structures will be fewer in number in the future, if not eliminated entirely through improved ETC services and imaging technologies which will allow vehicles to be identified and charged for their road use without having to stop or slow for a plaza.

Such "open road tolling" (ORT) is a natural progression of ETC technologies and most "new start" toll facilities are being designed with these systems in place from the first day of operation. Many existing agencies are in the process of removing toll plazas, notably the Illinois Toll Road, because a sufficient proportion of their customers are making use of transponder-based ETC to allow for a reconfiguration of the roadway to accommodate high-speed non-stop tolling. As your letter notes, both the agencies and their customers benefit; in reduced congestion, enhanced safety, improved fuel economy and pollution reduction.

Traffic congestion is pervasive around the country and while currently toll facilities do experience traffic backups and stoppages at their toll plazas, Interstate highways in most urban regions also suffer recurring stoppages on a daily basis without the benefit of any signage or warning for the users of those roadways. Toll agencies invest significant resources in signage at the toll plazas and in efforts to educate their customers as to how best to navigate a toll plaza.

The imposition of Federal standards on toll facilities is problematic insofar as Federal funding is typically not available to these projects, and thereby the traditional threat of withholding funding to enforce compliance with federal regulations has little impact. The toll agencies do freely communicate with each other to assess best practices and applications and IBTTA provides them a forum in which to conduct these interactions and share information.

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As to your recommendation that IBTTA should cooperate with the Federal Highway Administration (FHWA) and the American Association of State Highway and Transportation Officials (AASHTO), we want you to be aware that IBTTA and our members have strong relationships with these entities and are already cooperating on this issue and on many others.

IBTTA and our members have been participants in the development of the National Committee on Uniform Traffic Control Devices. We have also been fully engaged in the development of the Federal Highway Administration's soon to be released "**State of the Practice and Recommendations on Traffic Control Strategies at Toll Plazas.**" We have worked with FHWA to ensure they had access to our member agencies and the acknowledged "best" practices in the industry.

We will be distributing this information to our agency members as well as the associated industries providing engineering and other services to the toll agencies. As you note in your letter, such development of a guide is similar to the process AASHTO uses to fulfill the research and analysis requirements for updating their Green Book. This report can also help fill the void you've noted insofar as neither the AASHTO Green Book nor the FHWA's MUTCD address toll plaza design at this time.

IBTTA and our members are also taking part in the **Toll Facilities Workplace Safety Study** called for in Section 1403 of SAFETEA-LU. FHWA has engaged a contractor to advance the project and IBTTA anticipates playing a major role in providing contacts and support for the data collection efforts needed to assess the best practices available for ensuring both employee and customer safety at toll facilities.

With the growing interest in toll financing IBTTA is fully engaged in offering relevant and useful information to governmental bodies that are considering the development of toll facilities. We are also a first point of contact for newly formed toll agencies and provide a forum for these new starts to incorporate the best industry practices from the outset of their operations. It is our opinion that we are already performing the actions included in your recommendations.

We appreciate the valuable service that the NTSB performs for the nation in investigating accidents and offering recommendations to resolve the issues you discover. Your investigation in this matter has served to confirm many trends that we already understand but that are not fully appreciated by the general public.

Sincerely,



Patrick D. Jones
Executive Director