



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

JUN 1 2016

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

In Reply Refer To: HOTO-1

Mr. Daniel K. Shipp
President
International Safety Equipment Association
1901 North Moore Street
Arlington, VA 22209-1762

Dear Mr. Shipp:

Thank you for your letter of February 26, 2016 requesting an interpretation of Sections 6D.03, 6E.02, and 7D.04 of the 2009 Manual on Uniform Traffic Control Devices (MUTCD). Specifically, your question concerned whether the new ANSI/ISEA 207-2015 standard meets the requirements contained in these sections.

The intent of the 2009 MUTCD is to require workers, flaggers, and adult crossing guards to wear apparel meeting the requirements of ANSI/ISEA 107-2004 and the ANSI/ISEA 207-2006 standards or subsequent revisions, provided that the requirements of subsequent revisions were at least equivalent to the requirements of the original standards. The labeling should indicate the appropriate standard number of the garment.

The latest version of the high visibility garment standard (ANSI 107-2015) combines the requirements of ANSI/IESA 107-2010 and ANSI/IESA 207-2011 into a single comprehensive standard with new designations for intended use conditions. Type R (roadway) garments are intended for roadway workers who are exposed to traffic. Type R Performance Class 2 or 3 align with the ANSI/ISEA Class 2 or 3 garments. Type P Performance (public safety) Class 2 is equivalent to the ANSI/ISEA 207-2006 garment and the Class 3 is new and intended to go beyond the minimum requirements and provide an additional option for emergency responders. The requirements set forth in these newly revised standards would be in compliance with the provisions of Sections 6D.03, 6E.02, and 7D.04 of the 2009 MUTCD.

For recordkeeping purposes, we have assigned the following official interpretation number and title: "6(09)-037(I) – Use of ANSI/ISEA 107-2015 High-Visibility Safety Apparel." Please refer to this number in any future correspondence regarding this topic.

Thank you for bringing this matter to our attention. Please contact Mr. Ken Wood at ken.wood@dot.gov if you have any further questions concerning this matter.

Sincerely yours,

Mark R. Kehrl
Director, Office of Transportation Operations