

December 14, 2012

William N. Hall

T 202.344.4631  
F 202.344.8300  
wnhall@venable.com

**VIA E-MAIL**

Alice Kelly  
Manager  
Policy Branch,  
Policy, Planning and Sustainability Administration  
District Department of Transportation  
55 M Street, S.E., 5<sup>th</sup> Floor  
Washington, DC 20003

**Re: Proposed Rulemaking on Sign Regulations**

Dear Ms. Kelly:

We submit these comments on the proposed Sign Regulations in new Title 13, published by the Office of the Mayor on August 16, 2012 (59 D.C. Reg. 10022-10099).

We strongly recommend that a separate sign category be established for signs used to identify the name of multi-story or single occupancy buildings (“building identification signs”) where the size of the sign is not limited to the current and proposed restriction of 1/40<sup>th</sup> of the size of the street frontage. *See* Proposed Reg. Title 13, §§ 716 & 717. The need for larger building identification signs, such as hypothetically the “Gatorade Sports Club Building” or the “Federal Express Armory Building,” is twofold.

First, these larger signs would encourage companies to locate in the District and enhance City economic development by permitting companies to more prominently promote their presence through the identification sign on buildings in which they are housed. Larger building identification signs would allow the District to better compete with surrounding jurisdictions where more prominent, larger signs for building identification are allowed and, thus, increase the City’s opportunity for attracting new businesses and generating economic growth.

Second, larger building identification signs would provide increased safety and convenience for those who are driving and trying to locate particular buildings in the City. It is often very difficult for a driver to find a very small street address sign or small business identification sign for an unfamiliar building, particularly in heavy traffic during business hours in downtown Washington, and still safely focus on traffic and pedestrians.

Alice Kelly  
December 14, 2012  
Page 2

We are interested in working with you to develop the specifics of the new building identification sign category and the size parameters and other requirements for this sign category. Please contact us with any questions or comments. We look forward to working with you.

Sincerely,

A handwritten signature in black ink, appearing to read "William N. Hall". The signature is fluid and cursive, with the first name "William" being the most prominent.

William N. Hall  
Claude E. Bailey