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November 19, 2012

District Department of Transportation
Attn: Alice Kelly
55 M Street, SE, Ste 500
Washington, DC

Re: Comments on Proposed Rulemaking Pertaining to Sign Regulations

To Whom It May Concern:

We are writing to express our interest in the sign regulation amendment process within the District of Columbia and provide general comments pertaining to on-premise variable message signs and other on-premise signs of an electronic nature. Please note: our lack of comments pertaining to other sign types and off-premise signs should not be construed as support of the proposed regulations.

Lack of brightness controls for variable message signs

The proposed regulations do not dictate brightness limitations for variable message signs. Brightness is the single most common complaint we hear regarding such signs, and is, thus, of paramount importance to regulate.

Variable message signs periodically adjust their brightness throughout the day so as to be able to be seen in varying ambient light conditions. For instance, during a bright, sunny day a variable message sign should be producing high illumination so as to be legible under high ambient light conditions. Conversely, at night, that same variable message sign should be producing significantly less illumination so as not to be producing so much illumination to cause a glare under low ambient light conditions.

Inserting language into the proposed regulations stating that all variable message signs should come equipped with automatic dimming capabilities that dim their brightness in direct correlation with ambient light conditions will ensure that such signs are not deemed overly bright. Additionally, the district can also insert measurable standards for enforcement, if needed. We are happy to supply the industry standards for this measurement upon request.

Area allowances for variable message signs

Rather than a set square footage requirement of 40-square feet for variable message signs, we would encourage the district to consider allowing a percentage of the allowed sign area for the signs on which variable message signs are placed to be dedicated to variable message capabilities. This would allow for such signs to better fit into the overall signage scheme of the property where they are located, rather than be limited to a set area. A set area could lead to the sign either being too large or too small when taken in correlation with the overall sign allowances.

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We would suggest, at the very least, to permit variable message signs to be 50 percent of the allowed sign area for the sign on which the variable message sign is to be placed. However, 75 percent or more would be optimal.

Message duration requirements for variable message signs

While we understand the rationale behind a requirement that limits variable message signs to changing once every eight seconds without the use of movement or effects, we feel that enforcement of such requirements could be potentially very difficult for the district. This is especially true given the fact that the proposed requirements provide exemptions for movement for window television monitors and large-scale projects.

The above being said, we would suggest providing an incentive for businesses with variable message signs to comply with the standards by permitting transitions from one message to the next to contain entry and exit effects. Not only does this standard allow for less-abrupt transitions from one message to the next, it provides incentive for sign owners to comply with the eight-second message duration requirement.

With that, we thank you for your consideration of our comments. We request that we be placed on the list of stakeholders who are being notified regarding this rulemaking process.

Daktronics is the world leader in design and manufacture of electronic display systems. We are committed to working closely with our customers and other stakeholders on a responsible approach to the regulatory environment.

Please feel free to contact me with any questions or comments.

Best regards,



Terra Fisher
State and Local Regulatory Affairs
605-692-0200