



December 9, 2021

**RE: COMMENTS ON AUTOMATED FLAGGER ASSISTANCE DEVICE TCP #000-0043**

The Ontario Road Builders' Association (ORBA) would like to provide the following written comments in response to the provisions for "Automated Flagger Assistance Devices" as posted on the MTO Technical Consultation Portal (TCP #000-0043).

The Ontario Road Builders' Association is proud to represent the road building sector in Ontario. Our members build the majority of provincial and municipal roads, bridges and transportation infrastructure across the province. The road building sector directly and indirectly employs approximately 56,000 workers at peak season and impacts all Ontarians.

ORBA would like to propose several comments for consideration in the development of proposed regulatory changes for automated flagger assistance devices (AFADs). These comments are based on our experience with Book 7 industry best practices when operating AFADs.

1. Allow one operator to manage two AFADs on road construction projects. Most AFAD technology assumes a TCP will independently control two or more AFADs. This technology provides the operator with superior information compared to that of another TCP using wireless communication to help direct traffic. Our members have found that it is safer to have one operator managing traffic (two AFADs) because it eliminates the human error in communication regarding directing traffic entering and exiting work zones.

Attached are two jurisdictional examples from Saskatchewan and P.E.I. when using at least one flagger or TCP is the preferred common practice.

2. Allow one operator to be used on longer work areas (50m-2km) as long as there is continuous and unobstructed visuals of all operational AFADs and traffic.
3. Allow radio remotes to be used for operation of AFADs over a distance of 300 m.

Thank you for the opportunity to provide comments. Please do not hesitate to contact Brianna Puigmarti, Policy Advisor, Policy & Stakeholder Relations Division, at [brianna.puigmarti@orba.org](mailto:brianna.puigmarti@orba.org).

We are available to answer any questions regarding this submission.