Bus Shelters on Right of Way

- Barbara Wessinger
- Assistant Chief Counsel
- SCDOT
- Columbia, South Carolina
This photograph, from about 1952, shows a young woman on a bench built by her father so she would have a place to sit while waiting for a bus. The photograph inspired the Jacksonville Jaycees to install about 1,200 benches.
How much water you give your lawn.

How much it really needs.
NOT JUST ANOTHER REALTOR, A MAN WHO CARES!

1-866-5OGNPHY
www.ognphy.com
Bus Shelters on Right of Way

- No advertising on right of way

- What authorities govern?
  - Title 23, United States Code (U.S.C.), Section 109(d), Standards for Federal-Aid Highways.
  - 23 U.S.C. 111(b), Rest Areas.
  - 23 U.S.C. 156, Proceeds from the Sale or Lease of Real Property.
  - Title 23, Code of Federal Regulations (CFR), Section 1.23(b), Rights-of-way.
  - 23 CFR Part 655, Subpart F, Traffic Control Devices on Federal-Aid and Other Streets and Highways.
  - 23 CFR 655.603, Standards for Traffic Control Devices on Federal-Aid and Other Streets and Highways.
  - 23 CFR Part 750, Highway Beautification (for controlled routes).
  - 49 CFR 1.48(b), Delegations to Federal Highway Administrator.
• 23 USC 111 – “All agreements between the Secretary and the State transportation department ..... shall ..... contain a clause providing that the State will not permit ..... commercial establishments for serving motor vehicle users to be constructed or located on the rights-of-way of the Interstate System...”
23 CFR 1.23(b). Use for highway purposes. Except as provided under paragraph (c) of this section, all real property, including air space, within the right-of-way boundaries of a project shall be devoted exclusively to public highway purposes. No project shall be accepted as complete until this requirement has been satisfied.
• 23 CFR 1.23 – continue - The SDOT shall be responsible for preserving such right-of-way free of all public and private installations, facilities or encroachments, except (1) those approved under paragraph (c) of this section; (2) those which the Administrator approves as constituting a part of a highway or as necessary for its operation, use or maintenance for public highway purposes and (3) informational sites established and maintained in accordance with § 1.35 of the regulations in this part.
Policy on Sponsorship Acknowledgment and Agreements within the Highway Right-of-Way

April 7, 2014

(2) The FHWA recognizes a distinction between signing intended as advertising and signing intended as a sponsorship acknowledgment. Advertising generally has little, if any, relationship to a highway service provided. Instead, the advertiser seeks to get its recognizable message, company emblem, or logo before the public, and if possible, information on how or where to obtain the company’s products or services. In most cases, if the sign goes beyond recognizing the company’s contribution to a particular highway service or includes telephone numbers, Internet addresses, or directional information, the sign is more properly classified as an advertising sign and not as an acknowledgment sign.
• (3) The use of highway right-of-way for advertising purposes is not allowed, except as provided in 23 U.S.C. 111(b), Rest Areas.
  
  ▪ (a) When advertising within the highway right-of-way is identified, the FHWA Division Administrator should take timely notice and develop a plan for corrective action to bring the State into compliance with the CFR.
  
  ▪ (b) This policy position is consistent with the principles and intent of several laws and regulations including 23 CFR 1.23(b), 23 U.S.C. 109(d), 23 U.S.C. 111(b), 23 U.S.C. 131, and 23 CFR Part 750. Furthermore, Paragraph 3 in Section 1A.01 in the MUTCD states, “Traffic control devices or their supports shall not bear any advertising message or any other message that is not related to traffic control.”
  
  ▪ (c) These laws and regulations are based on safety and operational concerns, particularly as related to driver distraction. Highway signs and other traffic control devices convey crucial information. In order for road users to perceive and respond appropriately to critical information, the conspicuity of highway signs and other traffic control devices must be preserved so that the safe and orderly movement of traffic is not compromised.
So, why is there advertising on right of way?
• **23USC 111** - Such agreements (FHWA and SDOT) may, however, authorize a State ....to use or permit the use of the airspace above and below the established grade line of the highway pavement for such purposes as will not impair the full use and safety of the highway, ......or otherwise interfere in any way with the free flow of traffic on the Interstate System.
Subject to 23 U.S.C. 111, the temporary or permanent occupancy or use of right-of-way, including air space, for nonhighway purposes and the reservation of subsurface mineral rights within the boundaries of the rights-of-way of Federal-aid highways, may be approved by the Administrator, if he determines that such occupancy, use or reservation is in the public interest and will not impair the highway or interfere with the free and safe flow of traffic thereon.
INFORMATION: Bus Shelters with Advertising

DATE: July 17, 1978

IN reply
refer to HOA-3

FROM: Executive Director

TO: All Regional Federal Highway Administrators
   Regions 1-10 and 15

It has come to our attention that many local jurisdictions are seeking to negotiate agreements with private companies for the free installation and maintenance of bus shelters along highways in urbanized areas, in return for the granting of a franchise to sell advertising space on portions of the shelters. We recognize that this is an attractive proposition for local government, both from an economic and fiscal point of view, and in the interest of promoting public mass transportation.

Since some of the roadways along which these shelters would be installed are covered by Federal-aid highway project agreements, the provisions of 23 CFR 1.23 are applicable. In FHWA Order 1-1, the authority to make determinations under that regulation is delegated to the Regional Administrators (with further authority to redelegate to the Division Administrators). The purpose of this memorandum is to provide you with some guidance for the exercise of your discretion under 23 CFR 1.23.

In determining whether a facility installed on the right-of-way of a previously approved Federal-aid highway project is permissible, the mere presence of advertising, which is understood to be the source of profit for a private enterprise, would not always render impermissible an otherwise permissible use of the right-of-way for a highway or other public purpose. However, there should be satisfactory assurance that such use will not impair the highway or interfere with the free and safe flow of traffic thereon. The same advice would apply to the approval of new Federal-aid highway projects when such facilities are in existence on the right-of-way.

We have conducted an informal review of a bus shelter program which has been in effect in New York City for the last three years, and it is our opinion that the presence of shelters of this design, with their limited use for advertising, is not inconsistent with
• July 1978 FHWA memo
• Local jurisdictions allowing private companies to install bus shelters/benches on SDOT right of way in exchange for advertising rights
• If a routes is a federal-aid funded route, then non-highway use is permissible under 23 USC 111 and 23 CFR 1.23.
• 23 CFR 1.23(b) SDOT is responsible for preserving ROW free of all public and private installations, facilities or encroachments

• 23 CFR 1.23(c) provides for non-highway use with FHWA approval provided the use:
  ▪ Is in the public interest;
  ▪ Does not impair the highway, and
  ▪ Does not interfere with the free and safe flow of traffic.
FHWA found that the presence of bus shelters on ROW, with limited advertising, is not inconsistent with the purposes of 23 CFR 1.23
Bus bench advertising submit to:

• Required bus shelter franchise be awarded by public invitation

• Equal access to qualified advertisers at reasonable rates

• Assure adequate controls over location, design, ad size and ad content.
Michael Tooley, Director  
Montana Department of Transportation  
2701 Prospect Avenue  
Helena, MT 59620-1001

Subject: Advertisement on Transit Shelters

Dear Mr. Tooley:

Over the course of the past six months, my staff worked cooperatively with your staff to advance proposed revisions to the Administrative Rules of Montana (ARM). These proposed revisions clarify procedures and definitions related to Outdoor Advertising Control, as well as create new rules that define provisions for the use of electronic billboards and govern advertisement on transit shelters.

With respect to the latter proposed revision, as you are aware, 23 CFR 1.23(b) requires state Department of Transportsations to maintain the state highway right of way (ROW) and ensure all ROW is free and clear of any use that is not considered to be a highway purpose. However, 23 CFR 1.23(c) allows FHWA to approve the use of state highway ROW for non-highway purposes provided the state DOT illustrates a benefit to the public and affirms that such action will not impair the safety and operations of the highway facility. Our cooperative work on the ARM intended to define criteria to conform to 23 CFR 1.23(c) and create a governing process for advertising on transit shelters (which is considered a non-highway use) within the highway ROW.

MDT identified a number of illegal advertisements on existing bus shelters when evaluating the potential revisions to the ARM. Absent the proposed revisions to the ARM, the state of Montana does not have procedures in place to approve the placement of advertising on transit shelters within state highway ROW. In lieu of an approved process, MDT must default to the requirements of 23 CFR 1.23(b) when considering proposals to construct transit shelters with advertising within the state highway ROW which prohibits the placement of advertising. Therefore, any advertising on existing transit shelters is an illegal use of the highway ROW.

Consequently, the Division Office expects MDT to fulfill their obligations under 23 CFR 1.23(b) through the immediate enforcement and removal of any illegal advertisement on transit shelters within the state highway ROW. Failure to comply with federal regulations may ultimately result in the loss of federal funds. Please provide a response describing MDT’s proposed plan to resolve this issue by Monday, June 13. You may contact Brian Hasselbach, of my staff, at (406) 441-3908 with any questions.
• June 6, 2016 FHWA memo
• Reiterated the 23 CFR 1.23(b) requirements
• Montana DOT was in the process of developing guidelines regarding advertisement on transit shelters
• Illegal ads were on shelters and MDOT had no procedures for such advertising
• Development of procedures failed.
• FHWA defaulted to 23 CFR 1.23 (b) which required MDOT to ensure ROW was free of commercial use and exclusive for highway purposes
• FHWA required MDOT to remove all advertising from shelters or face loss of federal funds.
Are bus benches or shelters required.....under America with Disabilities Act (ADA)?
• Are bus stops and other transportation facilities required to provide bench seating?

• No. The Americans with Disabilities Act (ADA) does not require public transportation entities to install bench seating at bus stops or at transportation facilities. However, transit systems may find it beneficial to provide seating, as it may enable use of the fixed-route system by persons whose disabilities prevent them from standing for extended periods of time, and who might otherwise be dependent upon paratransit service.
• **23 USC 142(f) Availability of Rights-of-Way.**—

• In any case where sufficient land or air space exists within the publicly acquired rights-of-way of any highway, constructed in whole or in part with Federal-aid highway funds, to accommodate needed passenger, commuter, or high speed rail, magnetic levitation systems, and highway and nonhighway public mass transit facilities, the Secretary shall authorize a State to make such lands, air space, and rights-of-way available with or without charge to a publicly or privately owned authority or company or any other person for such purposes if such accommodation will not adversely affect automotive safety.
• 23 CFR § 710.405 - ROW use agreements.

• (a) A ROW use agreement for the non-highway use of real property interests may be executed with a public entity or private party in accordance with § 710.403 and this section. Any non-highway alternative use of real property interests requires approval by FHWA, including a determination by FHWA that such occupancy, use, or reservation is in the public interest; is consistent with the continued use, operations, maintenance, and safety of the facility; and such use does not impair the highway or interfere with the free and safe flow of traffic as described in § 710.403(b). Except for Interstate Highways, where the SDOT controls the real property interest, the FHWA may assign its determination and approval responsibilities to the SDOT in their Stewardship/Oversight Agreement.
23 CFR § 710.403 - Management.

(b) The grantee must ensure that all real property interests within the approved ROW limits or other project limits of a facility that has been funded under title 23 are devoted exclusively to the purposes of that facility and the facility is preserved free of all other public or private alternative uses, unless such non-highway alternative uses are permitted by Federal law (including regulations) or the FHWA. An alternative use, whether temporary under § 710.405 or permanent as provided in § 710.409, must be in the public interest, consistent with the continued operation, maintenance, and safety of the facility, and such use must not impair the highway or interfere with the free and safe flow of traffic (see also 23 CFR 1.23).
• So, with other uses to ROW, federal law requires Fair Market Value (FMV) for the use

• Why not for the use of ROW for bus benches with advertising?
• 23 CFR 710.403 – Management
• Current fair market value must be charged for the use or disposal of all real property interests if those real property interests were obtained with title 23, United States Code, funding except as provided in paragraphs (e)(1) through (6) of this section.
• (1) When the grantee shows that an exception is in the overall public interest based on social, environmental, or economic benefits, or is for a nonproprietary governmental use. The grantee's ROW manual or RAMP must include criteria for evaluating disposals at less than fair market value, and a method for ensuring the public will receive the benefit used to justify the less than fair market value disposal.

• (2) Use by public utilities in accordance with 23 CFR part 645.
• (3) Use by railroads in accordance with 23 CFR part 646.
• (4) Use for bikeways and pedestrian walkways in accordance with 23 CFR part 652.
• (5) Uses under 23 U.S.C. 142(f), Public Transportation. Lands and ROWs of a highway constructed using Federal-aid highway funds may be made available without charge to a publicly owned mass transit authority for public transit purposes whenever the public interest will be served, and where this can be accomplished without impairing automotive safety or future highway improvements.
• (6) Use for other transportation projects eligible for assistance under title 23 of the United States Code, provided that a concession agreement, as defined in § 710.703, shall not constitute a transportation project exempt from fair market value requirements.
Mr. B. K. Jones  
Executive Director  
South Carolina Department  
of Transportation  
655 Park Street, P. O. Box 191  
Columbia, South Carolina 29202  

Dear Mr. Jones:

Subject: Bus Shelters

During our recent conversations, you inquired as to the FHWA position regarding the erection of bus shelters on the highway right of way and the permissibility of commercial advertising on the shelters.

It has been the long standing FHWA position that such use must not adversely affect the highway facility or interfere with the free and safe flow of traffic therein. Secondly, if South Carolina is to implement a bus shelter program, the FHWA would require that shelter erections be allowed based on competitive bid invitations.

We are available to further discuss our views on this matter.

Sincerely yours,

[Signature]  
Robert J. Probst  
Division Administrator

cc:  
File 517 (1)  
Reading File (1)
May 30, 1995 FHWA Memo

- Bus shelters allowed based on competitive bid invitation
- Must not adversely affect the highway facility
- Must not interfere with the free and safe flow of traffic 23 CFR 1.23 (c)
63-800 Purpose.
The regulations promulgated herein have been formulated pursuant to Code Section 57-3-110 and 57-25-30, which are intended to regulate bus shelters, including those with commercial advertisements, within the rights-of-way of public roads.

HISTORY: Added by State Register Volume 20, Issue No. 5, eff May 24, 1996.

63-801 Definitions.
A. “Bus Shelter” means a shelter located at designated bus stops for the convenience of passengers of public transportation systems owned and operated by governmental units or public authorities.
B. “Commercial Advertisement” means a printed or painted sign encouraging or promoting the purchase or use of goods or services but does not include signs or advertisements prohibited by Code Section 57-25-20.
Meet the anonymous artist installing bus benches at neglected stops on L.A.’s Eastside – LA Times – November 2018
• Over the course of 11 months prior to November 2018, an artist installed more than a dozen wood benches. In about 15 minutes, the stop had a brand-new bus bench.

• The installations were inspired in the wake of a debilitating knee injury he suffered. The stop near his home had no shade and no place to sit.

• So he built and placed a bench near his home, as well as near the home of a good friend who had cancer and used public transit to ride to medical appointments.
• It would seem logical that L.A. Metro, the entity that oversees much of L.A.’s public transit, would be the agency that manages street furniture. But it does not.

• Instead, benches at bus stops fall to the Bureau of Street Services (part of the Department of Public Works) in combination with each respective city’s local government.
• It is an extensive permitting process, requiring approval from the Department of Public Works, as well as eight — eight! — other city agencies including the Department of City Planning, the Bureau of Engineering, the Los Angeles Police Department and the Bureau of Street Lighting. Nearby property owners also have a say.

• It is a process that is described as “bloated and inefficient” in a nationwide report on bus stops.
• It is so bloated, in fact, that it has hindered the installation of advertising-driven benches and shelters (from which the city gets a percentage of revenue). Since 2001 (17 years ago), only 1,700 of the 2,500 promised shelters have been installed.

• (As a point of comparison: under a similar program, 3,500 shelters in New York City were installed over five years.)
QUESTIONS
• How many states allow benches with advertising on row?
• Shelters? Is there a difference?
• Are they only allowed at active bus stops on FAP route?
• What office controls or permits the bench on ROW in our agency?
• Do you issue separate advertising permits for each bench if they display advertising?
• Do your regs require 40% or more of all display are devoted to PSAs? (23 CFR 752 -for rest area privately operated information centers and systems)
Committee on Right of Way, Utilities and Outdoor Advertising Control 2019 Annual Meeting

Chattanooga, Tennessee
April 28–May 2, 2019
Getting Past the Bull

Nine Short Examples

1. The bull is on-premise.
2. It’s a rocket, not a sign.
3. That’s a “teaser campaign”.
4. Those 40’ Class III Power Poles set in concrete are temporary.
5. That’s a shuttle bus.
6. It should be commercial.
7. It was a handshake agreement with the DOT Director.
8. Make your barn an advertisement and get paid $13,000!
9. Aliens are stealing Iowa corn.
Getting Past the Bull
Exile Brewing Company is located in Des Moines, 20 miles away. Conclusion: Not on-premise.
Getting Past the Bull

D.O.T.- “Sign is not on-premise.”

Farmer- “The bull’s name is ‘Exile’. He is on-premise.”

D.O.T.- “Sorry, but that’s not going to work.”

Farmer- “Good luck. He is in the pasture where you will be trying to paint.”
District: “Brooks, we’d rather not do this. Can you hire a contractor?”

Contractor: “Brooks, the estimate is $850 but I’m not sure I want to send my painting crew in there if it’s not safe. Our customers usually want us there.”

Office Director: “Brooks, I don’t care if you do have a 24’ extension ladder and a telescoping pole; I don’t want you putting yourself in that position.”
A little “bull” from me

Brooks to the farmer: “We are all set to go for paint. We’ve got a red color that may or may not match. We’ll be issuing you a cost statement when we are finished.”
Ah....sweet relief.

Exile Brewing Rep calls:

“Brooks, you’ve got those folks all worked up. Just give us a couple of days and we’ll get it repainted.”

Barn repainted days later.
It’s a Rocket.
It’s a Rocket.
It’s a Rocket.
Is that a rocket or is that bull?
It’s a teaser campaign
Or maybe it’s bull.

D.O.T. cancelled permit for being a blank sign for 6 months. It’s nonconforming.

Company –
“This is regular practice in the billboard industry. You get a small glimpse of ad copy with the whole ad being unveiled later. It’s called a teaser campaign.”
Nonconforming Sign

April 1972 Photo

11 supports (there is one to the right that was not captured in the photo)
Nonconforming Sign

Storm Damaged
Nonconforming Sign

Repair in progress. 6 supports added.
The work that was done to the board was never intended to be permanent. The additional posts that have been added to the structure are a temporary solution. There had been severe storm damage done to the sign and immediate attention was required to preserve safety and avoid any possible dangerous condition. As agreed upon with the property owner and due to his crops not yet being harvested we agreed to temporarily support the structure and then after the harvest go in a repair it to avoid damaging his crops. As you are aware, since the support poles have been installed we have not done anything further to the structure. We have full intention of maintaining only eleven posts and improving the appearance of the sign face. A work order has in fact been issued to complete the repair by removing the temporary debris, as we understand crops have recently been harvested.
Crops were out for months and no further work was done.

Poles are set in concrete, 40’ long class III., run full-length of the sign.
It’s a Shuttle Bus
1. We own this property.
2. This is a licensed vehicle used for business purposes.
3. This is where our customers park so they don’t have to be seen.
4. This is a shuttle bus to take them to the business.
Iowa Code says “thou shalt not erect”

Definition of “erect” in Iowa Code includes the word “place”

“Place” is defined by Webster’s as “to put into a suitable or desirable place for some purpose.”

Clearly this vehicle was placed there for the purpose of advertising since it contains directional information, is positioned to be read from the highway, and has ground lights. [DOT prevails]
It should be commercial

Billboard Permit Application

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Signature of local zoning official does not necessarily grant local approval. See section #1 on Page 2.
D.O.T.- “Is this commercial?”
County Zoning - “Yes, it should be commercial”
D.O.T.- “so can you send some documentation?”
County Zoning- “well it’s actually AG-Cons.”
D.O.T.- “why did you sign off as commercial?”
County Zoning- “because it should be commercial”
D.O.T. – “it’s either commercial or it’s not”
County Zoning- “it’s not, but it should be”
Handshake Agreement
Moving a sign along a scenic byway

Sign was moved 675 feet along a scenic byway during a State highway project (State did not move it; City did for a related project.)

State made it clear to the billboard company on several occasions (including multiple legislative contacts) that signs cannot be moved.
Company –

“During a Sept. 2013 meeting between the owner of the company and the Iowa D.O.T. Director there was a handshake agreement to allow this sign to be moved.”
**Getting past the bull.**

**CITY OF SIoux CIty**

**BUILDING DEVELOPMENT PERMIT**
**INSPECTION SERVICES DIVISION**

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**Owner**

PO BOX 447  
SIoux CIty  
IA 51102

**Contractor**

PO BOX 235  
SIoux CIty  
IA 51102

(712) 252-4595

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**Valuation**

0
Getting past the bull.

Concrete Footing stamped 11-7-12
Would You Make Your House an Advertisement for $13,000?

Because this guy did just that with his barn
Clear Channel Rep:
“A marketing firm for McDonalds called us and asked about billboards along the interstate and we explained the restrictions. Then they asked about painting barns and we said those same restrictions apply. Now we see this painted barn. Can you guys do something about this?”
Mark Owens thought he’d struck a great deal last year when he let an advertising company paint the iconic McDonald’s arches on his barn north of Interstate Highway 80 near Williamsburg.

But after the Register published an article about that deal, the Iowa Department of Transportation notified the part-time farmer that the advertising violated the law. The DOT told Owens in January he had to remove the “I’m Lovin’ It” logo and other wording painted in bright orange and yellow on the decades-old structure—or risk facing fines or other sanctions.

Since then, Owens’ luck has decidedly gone south. He recently contacted the Reader’s Watchdog, claiming the Pennsylvania advertising company he struck the deal with failed to uphold its end of the bargain.

Christine Barnes, an owner of that company, tells a different story. She says the farmer became abusive toward her and her husband after they tried to make good on their promises.

The good news: Both sides appear ready to settle up and put the unfortunate experience behind them.

See ROOD, Page 21
At first I declined, but they came back offering more cash.

I wasn’t real crazy about the idea.

They told me it was perfectly legal.

I can’t remember the last time I ate there; I get better beef at home.

I can’t get up there on a ladder; I’m afraid of heights.

I’m lovin’ it.
“Mural Artist” wants to paint barn
“No commercial connection”

It’s related to Facebook posts: Aliens are stealing Iowa corn
Harmless Fun?
No. It’s our friends from Exile Brewery again!
Zoltan Product Line
Zoltan Product Line
Austin,

The green tear-drop shape with the big black eyes is used in some of Exile’s products or marketing. The act of beaming up or beaming down or just beams in general is a concept used in Exile’s products or marketing. Since the barn advertised for Exile previously, it’s not much of a stretch to continue to make the connection. Followers of Exile will certainly “get it”. Questions about the image for those who aren’t “in on it” will undoubtedly be answered in a short while....perhaps even a news story or social media page. That may sound exciting to a marketing person but unfortunately regulations prevent this commercial connection from being made at this location. Let me know if you have any other questions. Thanks.
Austin, still not identifying himself as being with Exile Brewing, accidently sends me this email (intended for his boss)

On Wed, Oct 4, 2017 at 4:54 PM, austin hoffman <alhoffma87@gmail.com> wrote:

Going to have to redesign the alien head shape to get past this guy.
MOBILE DIGITAL ADVERTISING

Committee on Right of Way, Utilities, and Outdoor Advertising Control Annual Meeting, 2019
Every time you feel yourself getting pulled into other people's nonsense, repeat these words:

NOT MY CIRCUS,

NOT MY MONKEYS.

~ Polish Proverb
MOBILE DIGITAL ADVERTISING

- 49 CFR 571.108: STANDARD 108; LAMPS, REFLECTIVE DEVICES, AND ASSOCIATED EQUIPMENT
  - DETAILS STANDARDS FOR VEHICLE LIGHTING.
MOBILE DIGITAL ADVERTISING

• State or local laws & ordinances
MOBILE DIGITAL ADVERTISING

- Parked on ROW?
- Considered an encroachment

Committee on Right of Way, Utilities, and Outdoor Advertising Control Annual Meeting, 2019