

DEPARTMENT OF TRANSPORTATION



QUESTIONNAIRE

REGARDING TRANSITIONING FROM THE CURRENT TITLE-21 PROTOCOL TO A NEW PROTOCOL

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The California Department of Transportation (Caltrans) is currently considering the development of regulations regarding new technologies and new technical specifications to replace the current automated vehicle identification protocol currently set out in the California Code of Regulations (commonly referred to as the “Title-21 protocol”). Caltrans is very interested in hearing from stakeholders as to their views on the transitioning from Title-21 protocol to a new protocol, most likely the 6C protocol.

Caltrans will be holding two public workshops (July 8, 2015 in Oakland and July 22, 2015 in Fontana) to solicit initial comments on the transition from the current Title-21 protocol.

However, in anticipation and in connection with those workshops and other activities to facilitate public participation in the regulatory process, Caltrans invites you to complete the following questionnaire. This information will greatly assist Caltrans as it begins the process of considering new regulations.

Please provide your responses following each question. Please feel free to forward this questionnaire to any other interested parties.

Please e-mail your responses to: Title.21.Changes@dot.ca.gov.

Please list the name of the person completing the questionnaire and the name of the agency or company you represent.

NAME Stephen Glascock, PE; (225) 379-2516

AGENCY Louisiana Department of Transportation and Development

1. Are there any alternatives to the transition to 6C, including comparable Federal regulations or regulations/protocols in other states?

Following March 2015 internal testing of the ISO 18000 6C protocol, LADOTD plans to add the 6C protocol to the current 6B and ATA protocols in the 4Q'15 – 1Q'16 time period; ATA protocol will be phased out in 2016. The lane equipment has been updated to multi-protocol AVI readers allowing for compliance with upcoming MAP-21 requirements.

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2. **What are the benefits of the transition to 6C? What are the drawbacks?** LADOTD looks forward to procuring 6C transponders at a much lower per unit price than the current ATA/6B transponders. The savings will be passed onto customers as a means to increase transponder penetration, thus reducing overall per transaction cost. As a pre-6C project, LADOTD upgraded our AVI readers and antennae to multi-protocol readers, which improved our AVI operational performance. Customer impact of swapping out the ATA protocol transponders to 6C transponders and capital costs to upgrade equipment are the only drawbacks. Those drawbacks are minimal compared to the long term benefits of the operational cost savings gained.

3. **Please discuss the factors involved, including projected timetables, for transitioning to a new protocol, with respect to the following:**

- a. Transponder procurements/existing inventories **Due to LADOTD procurement rules and the 6C transponder manufacturing process, the identification of transponder vendors, adjustment of existing inventories and rollout is expected to take no less than -6 months.**
- b. Toll-system modifications **LADOTD was able to upgrade LA1 toll facility toll equipment in March of 2015 that included adding 6C protocol transponders during full commissioning testing as part of a broader project scope. The 3M 6204 multiprotocol readers provided the flexibility to add 6C transponders and continue to use the 6B and ATA protocols without interruption due to the current slower speed of the traffic at the toll plaza. Removal of the ATA protocol transponders from production will also allow a higher speed traffic condition in a future conversion to AET.**
- c. Agency administrative changes **Current business rules allow GeauxPass(Louisiana AVI system) account holders having ATA hardcase transponders to register multiple license plates to a single transponder; administrative changes will include a 1 transponder per vehicle business rule. Minimal back office changes are required to include 6C transponders into inventory.**
- d. Public education, outreach, and marketing **LADOTD will use the 6C procurement opportunity to increase transponder penetration and replace existing ATA transponders. Marketing and Outreach will be significant in the Port Fourchon/Grand Isle area.**
- e. Issues regarding certification **LADOTD has plans to join the 6C Toll Operators Coalition and agrees with the current certification process in place by Omni Air.**
- f. Issues regarding three-position transponders. **LADOTD does not have any current or future facilities that would require this functionality.**

4. **Please describe how the transition:**

- a. Impacts business and/or employees **Transitioning to the 6C protocol is expected to reduce our transponder procurement costs and the lower cost per unit cost allows the business rule change to a transponder per vehicle at a much lower cost to the DOTD and customers.**

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- b. Impacts small businesses **Favorable - transponder costs will increase penetration, decreasing time in the lane to pay toll via cash or credit card.**
 - c. Impacts jobs or occupations **Negligible.**
 - d. Imposes reporting requirements **None**
 - e. Impacts individuals. **None**
5. Will the regulation affect the ability of California businesses to compete with other states by making it more costly to produce goods or services here? **Unknown.**
6. What are the costs that businesses and individuals may incur to comply with this regulation over its lifetime? **By adopting the 6C protocol, transponder costs will decrease significantly which will lower cost of operations by increasing transponder penetration and reducing toll transaction times for those businesses and individuals that chose to transition from Cash to Transponder.**
7. What are the fiscal impacts on state and local government? **See above.**
8. Are there any issues regarding fairness of competition? **As the 6C protocol is open and not constrained by proprietary licenses, fairness and open competition will benefit the tolling industry as a whole.**
9. Are there any issues regarding individual privacy? **No expected impact in Louisiana**
10. Please provide comments on any other relevant issues not addressed above.

THANK YOU FOR COMPLETING THIS QUESTIONNAIRE