

## 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](mailto: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 Tim Lew

AGENCY Metro ExpressLanes

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

Metro ExpressLanes is only looking to transition from Title-21 to 6C. No other alternatives are being considered.

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2. **What are the benefits of the transition to 6C? What are the drawbacks?**
- Potential Benefits:
    - Lower cost transponders
    - Non-proprietary protocol
    - No battery change out or replacement required
    - Flexible transponder design and usage
    - Current lane hardware 6C configurable
  - Potential Disadvantages:
    - No design for switchable 3-setting transponder
    - No audio indicator
    - Costs associated to upgrade (Lane & Back Office)
    - Multiple transponder types in circulation during a two to three year window
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**

Title - 21 Transponder procurements are ongoing. Transitioning to 6C will require Form Factor/Testing, Procurement and Customer Service related processes to deploy 6C tags. Testing, Procurement, and Delivery is estimated at 2 ½ years.
  - b. Toll-system modifications**

Lane, Back Office and CTOC interfaces will need to be updated and tested. Estimated timetable is 2 years.
  - c. Agency administrative changes**

Agency administrative changes will occur during Toll System Modifications and Transponder Procurements.
  - d. Public education, outreach, and marketing**

Marketing, outreach and customer materials updates will happen during the 6C tag procurement phase and is expected to take 6 months of the 2 ½ years.
  - e. Issues regarding certification**

Metro will request guidelines from CTOC in regards to the certification process
  - f. Issues regarding three-position transponders**

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Metro requires a 3-position tag. If existing vendors require additional design time, this would delay deployment.

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

**a. Impacts business and/or employees**

Increased money spent to upgrade systems, procure tags and market the changes. Cost to do so is insignificant compared to the transponder cost savings over time.

**b. Impacts small businesses**

Possible increased small business involvement with the Metro SBE program

**c. Impacts jobs or occupations**

Increased job and employee utilization to upgrade Lane and Back Office Systems. Excess Net Revenues generated due to transponder savings over time will be reinvested in the corridor projects creating additional jobs.

**d. Imposes reporting requirements**

Reporting requirements are expected to remain the same

**e. Impacts individuals.**

Individual customers will be educated on new transponder type and be provided with a 6C transponder with new requests or replacements requests of Title 21 transponder. Anticipating a phase out of Title 21 and phase in of 6C. Customers should not be inconvenienced.

**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?**

The transition to 6C, especially if national toll facilities select 6C, should create a competitive environment including opportunities for California businesses if they chose to enter the market. Today Title 21 transponders are manufactured outside of California.

**6. What are the costs that businesses and individuals may incur to comply with this regulation over its lifetime?**

There will not be any cost to Metro ExpressLanes customers or businesses as a result of this change.

**7. What are the fiscal impacts on state and local government?**

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Upgrades will be done utilizing existing toll revenue thus no fiscal impacts to state or local government are expected.

**8. Are there any issues regarding fairness of competition?**

6C tag procurements will be competitively bid. Depending on the new protocol approval date, system upgrades may be sole sourced or competitively bid.

**9. Are there any issues regarding individual privacy?**

None are expected

**10. Please provide comments on any other relevant issues not addressed above.**

No additional comments

**THANK YOU FOR COMPLETING THIS QUESTIONNAIRE**