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 Michael Blomquist

AGENCY RCTC

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

   There is work being done for National Interoperability but we want to move forward with 6C as a preferred protocol for Title 21. If 6C is selected as national protocol we will be fully compliant, if another protocol is selected 6C can still be used as the regional legacy protocol in addition to the national protocol.
2. What are the benefits of the transition to 6C? What are the drawbacks?  
   The current Title 21 technology is not well supported by industry. The technology is old and becoming obsolete. The existing transponders are also much more expensive than the proposed 6C transponders. The details of how to use 6C for CTOC still need to be defined and the timing of the transition to 6C needs to be finalized.

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
   b. Toll-system modifications
   c. Agency administrative changes
   d. Public education, outreach, and marketing
   e. Issues regarding certification
   f. Issues regarding three-position transponders.

   RCTC will be opening the SR91 Express Lanes in early 2017. The project is incorporating additional 6C design elements into lane equipment and back office in addition to the existing Title 21 protocol. Additional upgrades to the lane system and back office system will be required after 6C is approved and final protocol details are agreed upon. The I-15 Express Lanes will open in 2020 and could be designed to support both existing Title 21 and 6C protocols. Until the schedule is finalized for the full acceptance of 6C transponders, we will not be undertaking any public outreach or marketing.

   Although the SR91 Express Lanes can recognize three-position transponders, current policy requires vehicles to utilize a 3+ lane at the tolling point in order to receive a toll discount. The policy for the I-15 Express Lanes regarding the use of three-position transponders has not yet been established.

4. Please describe how the transition:
   a. Impacts business and/or employees
   b. Impacts small businesses
c. Impacts jobs or occupations

d. Imposes reporting requirements

e. Impacts individuals.

   The 6C transponders will be less expensive and therefore more people may purchase transponders making it easier for people to use the Express Lanes.

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?

   No – the 6C transponders should be less expensive than the current Title 21 transponders so it will not make it more costly to produce goods or services here.

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

   No one is required to purchase transponders or to use the Express Lanes. People and business are free to choose if it is worth it to them to procure a transponder and take advantage of the time savings offered by the Express Lanes.

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

   The new 6C transponders should be less expensive and could save agencies money on procurement of transponders.

8. Are there any issues regarding fairness of competition?

   No – the 6C transponders are produced by several companies.

9. Are there any issues regarding individual privacy?

   Not aware of any.

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

THANK YOU FOR COMPLETING THIS QUESTIONNAIRE