February 15, 2017

Mr. Malcom Dougherty
Director
California Department of Transportation
1120 N Street
Sacramento, CA 94273

RE: Proposal to Amend California Code of Regulations Title 21, Division 2, Chapter 16: Compatibility Specifications for Automatic Vehicle Identification Equipment

Dear Mr. Dougherty,

American Roads would like to express its strong support for Caltrans’ effort to transition from the current Automatic Vehicle Identification protocol specification documented in California Code of Regulations, Title 21, Division 2, Chapter 16 (commonly referred to as the “Title 21 protocol”) to the International Standards Organization (ISO) 18000-63 protocol (known as the “6C protocol”), a leading-edge technology with many benefits.

American Roads owns and operates four toll bridges in the state of Alabama as well as operates an international tunnel crossing between Detroit, Michigan and Windsor, Ontario. We have utilized the 6C protocol since 2012, recording several million transactions yearly using the technology. In fact, due to the low cost and high customer satisfaction of the technology, we continue to expand our 6C lane deployments.

As an owner/operator, we are especially conscious of the cost-benefit analysis of any new technology for use in our tolling facilities. When we evaluated transponder technology for our own use, the low deployment cost and availability of multiple vendors of 6C protocol readers and tags was found to be an excellent benefit over the traditional, proprietary systems on the market. We found the protocol to be a mature technology already in use by a myriad of transportation and logistics operators. Quite simply, the 6C protocol was easily the best choice.

By leveraging an internationally recognized ISO standard, American Roads is able to reap the benefits of low costs brought about by transponder pricing competition and standardized equipment. In addition to the cost benefits of the widespread adoption of 6C in tolling and other applications, American Roads gains from the large knowledge base of 6C users and suppliers as well as technological advances that are beneficial to our operations.

American Roads believes California’s transition to the 6C protocol is a very positive move and it will help with potential future tolling interoperability opportunities.

Sincerely,

Stephen Hall
Chief Technology Officer
American Roads, LLC