



February 15, 2017

Mr. Steve Hancock
Department of Transportation, Traffic Operations.
1120 N Street, MS-36,
Sacramento, California 95814

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

Dear Mr. Hancock,

The 6C Toll Operators Coalition (“6C TOC”) is a collaborative organization composed of public sector toll facility operators/owners that use the International Organization for Standardization (“ISO”) 18000-6C transponders as a primary method for automatic vehicle identification for the purpose of toll revenue collection.

On behalf of the members of the 6C TOC we would like to express our strong support for the 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.

6C is an Open Standard that originated with work conducted under EPCGlobal and the ISO 18000-63 working group and is published as an open standard under both ISO and EPCGlobal. The technical protocol information is thus widely available through two internationally recognized and respected standards-setting bodies. Well known corporations, such as Wal-Mart and Google, and multiple industries, such as retail, health care, airlines, and automotive, have overwhelmingly supported and invested in 6C, thereby spurring competition amongst vendors to meet demand, and resulting in better pricing and continual innovations.

This Open Standard has spurred multiple vendors to offer 6C tolling products. Competition, as well as the worldwide demand for and production volumes of 6C chips, naturally drives down the price. For example, Colorado’s latest procurement enables them to purchase non-switchable

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“sticker” transponders at \$0.74/each and many of the 6C TOC operators have seen their 6C transponder prices drop through the years as well. 6C’s significantly lower transponder costs translate to cost savings of tens of millions of dollars for toll operators and the public over the years.

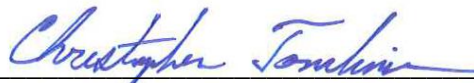
Since 2011, 6C TOC has been working with the OmniAir Consortium, a nationally recognized independent certification organization, to establish and maintain a 6C protocol certification program for tolling equipment. Our members procure OmniAir certified equipment to ensure products conform to the ISO and 6C TOC AVI Standards. 6C vendors and our members greatly benefit from a common certification testing, which reduces duplicative testing and translates to cost savings and lower implementation risks.

Because of the widespread availability and low cost, 6C TOC operators decided to either transition from our respective legacy protocols to 6C or to adopt 6C from the onset. In doing so, our members have made substantial financial investments in 6C technology and engaged in marketing and communications efforts with the public. Through these substantial investments, hundreds of thousands, if not millions of customers have enrolled in our respective toll collection programs. To date our 6C TOC operators have over 3.5 million 6C transponders in use. We have collectively processed over 500 million toll transactions and collected over \$1.2 billion in revenue.

In addition, Colorado and Vancouver, British Columbia both successfully demonstrate that the concurrent use of the Title 21 and 6C protocols for toll revenue collection works. California toll operators will similarly need to operate both the Title 21 and 6C protocols together before Title 21 is phased out by 2024 and can garner experiences from previous multiprotocol deployments. Furthermore, although transponder security has not been a concern industry wide, 6C TOC’s 6C AVI Standard has security measures available, which our members have the choice to implement for added security beyond those already available under the ISO standard.

In conclusion, the 6C TOC operators, in cooperation with California and other North American toll operators believe that 6C is the best device for seamless payment technologies. We believe that 6C is the right payment technology at the right time.

Sincerely,

By: 
Christopher Tomlinson, President of 6C TOC
State Road and Tollway Authority