3M appreciates the opportunity to comment on the Modifications to Text of the Proposed Regulations, and is supportive of these changes with the exception of the following comments.

Article 8, Section 1707.1 indicates the automatic vehicle identification equipment shall be compliant with the California 6C Electronic Toll Collection Standard Version 1.0. Article 9, Section 1708.1 provides for certification by a CTOC approved independent third party. 3M recommends the addition of further technical detail in the California 6C Electronic Toll Collection Standard Version 1.0 in the following areas:

1.) Section 3.1.1: 3M recommends the addition of the specification of the reference reader RF radiated power level applicable to this requirement.
2.) Section 3.1.2: 3M recommends the addition of the specification of the reference reader RF receiver sensitivity applicable to this requirement.
3.) Section 3.1.3, Tilt from horizontal plane: 3M recommends the removal of the text which mentions the return signal strength read range and proposes changing the absolute distance loss to a relative distance loss in percent referenced to the distance demonstrated in 3.1.1.
4.) Section 3.1.3, Tilt from vertical plane: 3M recommends the removal of the text which mentions the return signal strength read range and proposes changing the percent “loss in minimum activation energy” to a relative distance loss in percent referenced to the distance demonstrated in 3.1.1.
5.) Section 3.1.3, Rotation from horizontal plane: 3M recommends the removal of the text which mentions the return signal strength read range and proposes changing the percent “loss in minimum activation energy” to a relative distance loss in percent referenced to the distance demonstrated in 3.1.1.

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To All Concerned:

Caltrans received several comments during the 45-day comment period and the public hearing on the proposed Title 21 regulation. After reviewing the oral and written comments, Caltrans has determined that additional modifications to the originally proposed text of the regulations are necessary. The modified proposed regulatory text and other related documents are available at the following link [http://www.dot.ca.gov/trafficops/tech/title21.html](http://www.dot.ca.gov/trafficops/tech/title21.html) under the “Title 21 - Modifications to Text of Proposed Regulations (Additional Comment Period)” section. Comments on these documents should be submitted in accordance with the Notice of Modifications to Text of Proposed Regulations available at the webpage link above.

The deadline for submitting comments is 5:00 pm on April 12, 2017.

Regards,

Steve Hancock
Division of Traffic Operations

Caltrans
[Title.21.Changes@dot.ca.gov](mailto:Title.21.Changes@dot.ca.gov)
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