March 31, 2017

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

RE: Notice of Modifications to Proposed Amendments to California Code of Regulations Title 21, Division 2, Chapter 16: Compatibility Specifications for Automatic Vehicle Identification Equipment

Dear Mr. Hancock,

The Metropolitan Transportation Commission/Bay Area Toll Authority (MTC/BATA) would like to continue to express its strong support to Caltrans for its effort to transition from the current automatic vehicle identification protocol documented in the California Code of Regulations, Title 21, Division 2, Chapter 16, (commonly referred to as the “Title 21 protocol”), to the leading-edge technology and associated benefits as offered by the International Standards Organization (ISO) 18000-63 protocol, (known as the “6C protocol”).

My staff has reviewed the modifications to the text, which incorporated the recommended changes submitted jointly by the California Toll Operators Committee (CTOC). Our technical staff feel that the changes further enhance the efforts to adopt 6C, provide a complete specification, and increase competition for California’s tolling business.

We hold our position that the transition deadline of January 2019 is reasonable to allow MTC/BATA to incorporate the 6C protocol into our operations and would urge Caltrans to continue its active efforts to complete the regulatory change on our behalf. If our staff can be of any assistance, please contact Jeff Gerbracht at 415-778-6746 or jgerbr@mtc.ca.gov.

Sincerely,

Andrew B. Fremier
Deputy Executive Director, Operations

AF: JG

Attachments

J:\PROJECT\ATCAS Toll System\Transition to 6C\AVI Rulemaking\Letter to Hancock 033117.docx