



April 6, 2017

AFFILIATED AGENCIES

*Orange County
Transit District*

*Local Transportation
Authority*

*Service Authority for
Freeway Emergencies*

*Consolidated Transportation
Service Agency*

*Congestion Management
Agency*

*Service Authority for
Abandoned Vehicles*

Mr. Steve Hancock
Transportation System Performance Manager
California Department of Transportation
1120 N Street
Sacramento, CA 94273

**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 Orange County Transportation Authority (OCTA) would like to continue to express its strong support to the California Department of Transportation (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 a newer technology offered by the International Standards Organization (ISO) 18000-63 protocol, (known as the "6C protocol").

OCTA staff has reviewed the modifications to the text, which incorporated the recommended changes submitted jointly by the California Toll Operators Committee (CTOC). We 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 OCTA 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 Kirk Avila at (714) 560-5674 or at kavila@octa.net.

Sincerely,

Darrell Johnson
Chief Executive Officer

DJ:ka