



E-470 Public Highway Authority
22470 E. 6th Parkway, Suite 100
Aurora, CO 80018
303.537.3700 Phone
303.537.3472 Fax

Adams County
Arapahoe County
Aurora, CO
Brighton, CO
Commerce City, CO
Douglas County
Parker, CO
Thornton, CO

February 16, 2017

Mr. Stephen Hancock
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. Hancock,

E-470 Public Highway Authority is a political subdivision of the state of Colorado with a history of close to twenty years of collaboration with Caltrans and California Toll Operators Coalition (CTOC). Dating back to the expansion of E-470 in the late 1990's, E-470 collaborated with the Transportation Corridor Agencies (TCA) as both roads were expanding the developing open road tolling and customer service programs. At the time that E-470 began to use T-21 transponders, E-470 requested Caltrans assistance to account for and assign E-470 T21 transponder identification numbers in order to avoid tag number conflicts in hopes that at some time in the future, Colorado and California's toll customers would eventually be able to use the toll facilities in either state easily and without difficulty.

As the states in the western region of the United States are closer than ever before to achieving regional interoperability, E-470 strongly supports the Caltrans initiative to amend the California Code of Regulations Title 21, to authorize the adoption of the ISO 18000-6c protocol for use in California's toll facilities. E-470 and the state of Colorado have been doing so successfully since 2011 and welcome this initiative. As E-470 and Colorado has experienced, the 6C protocol will bring business efficiencies, cost savings improved toll system performance and customer satisfaction to California.

As a founding member of the 6C TOC, we join that coalition with our strong support for this 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"), an open standard and leading-edge technology with many benefits.

Sincerely,

A handwritten signature in black ink, appearing to read "David M. Kristick", followed by a small blue rectangular mark.

David M. Kristick
Deputy Executive Director and Director of Operations