



METROPOLITAN
TRANSPORTATION
COMMISSION

Bay Area Metro Center
375 Beale Street, Suite 800
San Francisco, CA 94105
415.778.6700
www.mtc.ca.gov

January 30, 2017

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Malcom Dougherty
Director
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. Dougherty:

The Metropolitan Transportation Commission would like to express its strong support to Caltrans for its 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 leading-edge technology and associated benefits as offered by the International Standards Organization (ISO) 18000-63 protocol, (known as the "6C protocol").

The current protocol, referenced in Title 21, was developed over 20 years ago to comply with the California legislative mandate for electronic tolling. However, the protocol has limitations, including the high cost of transponders, the limited number of vendors that produce transponders and readers, and the lack of certification requirements which has resulted in inoperability performance issues. With these challenges in mind, our agency, working through the California Toll Operators Committee (CTOC), assessed options that would mitigate them while continuing the significant success California has in tolling interoperability through use of a non-proprietary protocol. The outcome of that assessment identified 6C as the best solution considering its capabilities, cost and ever increasing use by toll agencies around the nation and globally.

The CTOC Executive Committee authorized the Technical Subcommittee to develop the CTOC 6C Transition Plan to examine the feasibility and timeline of a transition from the Title 21 protocol to the 6C protocol. As a result of the transition planning effort, the CTOC Executive Committee asked Caltrans to proceed with implementing regulatory changes through the Office of Administrative Law, which all the California tolling agencies support.

Leveraging this international standard and global use allows California to reap benefits not only in cost and equipment certification processes but also in the expanded knowledge base of users and suppliers as well as technology advances that could be beneficial to our operations.

Malcolm Dougherty
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We feel that the transition deadline of January 2019 is reasonable to allow 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, Senior Program Coordinator at 415-778-6746 or jgerbracht@mtc.ca.gov.

Sincerely,



Andrew B. Fremier

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