



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*

February 15, 2017

Mr. Malcolm 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 Director Dougherty,

The Orange County Transportation Authority would like to express its strong support to the California Department of Transportation (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 the leading-edge technology and associated benefits as offered by the International Standards Organization 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 interoperability performance issues. With these challenges in mind, our agency, working through the California Toll Operators Committee (CTOC), assessed options that would mitigate the Title 21 limitations 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 for California 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 current 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. This change is supported by all the California tolling agencies and backed by the experience of our peers in other states.

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Leveraging this international standard and global use of the protocol allows California to reap benefits not only in the cost of transponders and established 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. The 6C protocol allows for the market to be opened to more suppliers, which will drive down overall costs, and ultimately be passed down to the consumer. In addition, the significant savings on transponder costs, coupled with the ease of transponder distribution, will increase the adoption rate among the public and drive up toll road utilization rate.

We feel that the transition deadline of January 2019 is reasonable 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, General Manager of the 91 Express Lanes, at 714-560-5674 or through email at kavila@octa.net.

Respectfully,



Darrell Johnson
Chief Executive Officer

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c: OCTA Board of Directors
Platinum Advisors