Mr. 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,

Georgia’s State Road and Tollway Authority ("SRTA") would like to express its support for Caltrans’ effort to transition from the current protocol specification documented in California Code of Regulations, Title 21, Division 2, Chapter 16 ("Title 21 protocol") to the International Standards Organization ("ISO") 18000-63 protocol ("6C protocol").

In 2011, SRTA transitioned from the proprietary SeGo® protocol to the open standard 6C protocol after investigating various RFID and DSRC options and performing internal testing in both test and live tolling environments. SRTA concluded that 6C’s combination of performance, available form factors, and costs provided the best solution for Georgia’s tolling needs. After utilizing this protocol for the past five years, SRTA remains confident with its decision.

By leveraging an internationally recognized ISO standard, partnering with other states as part of the 6C Toll Operators Coalition ("6C TOC"), and using the OmniAir Consortium for 6C equipment certification, SRTA is able to reap benefits of low costs brought about by transponder pricing competition, common equipment testing, and product offerings. We have had proposers such as 3M, Xerox, Raytheon, Sice, Kapsch, TransCore, and Neology respond to our integration and equipment procurements, giving us comfort that this protocol can be supported by multiple reputable companies.

The adoption of the 6C protocol greatly reduced SRTA’s roadside RFID reader costs and also reduced our transponder (windshield sticker) cost from $9.20/unit to the $0.78/unit. This unit cost allows SRTA to provide transponders at no cost to our customers, which has enabled SRTA to transition to All Electronic Tolling with strong customer support. The various form factors (windshield, bumper mount and headlight/motorcycle) have also allowed us to better accommodate our various customer segments and to better serve unique vehicle windshield designs. To date, 6C has been used on over thirty million toll transactions in Georgia, collecting approximately forty-four million dollars ($44,000,000), and with over four hundred thousand 6C transponders distributed.

This 6C standard originated with work conducted under EPCGlobal and the ISO 18000-63 working group and is published as an open standard under both ISO and EPCGlobal. The technical protocol information is thus widely available to all through two internationally well-known and well-respected...
standards setting bodies. The 6C standard, as with other open standards, may have companies who claim that additional IP licensing may be necessary, but that does not negate the openness of the 6C Standard. One only has to look at the 6C procurements nationwide that have enjoyed multiple vendors bidding.

Once again, SRTA supports Caltrans in its continuing efforts to complete the regulatory change.

Sincerely,

Christopher Tomlinson

CT:mmj