

San Joaquin Hills  
Transportation  
Corridor Agency



Foothill/Eastern  
Transportation  
Corridor Agency

Chair:  
Ross Chun  
Aliso Viejo

## **Transportation Corridor Agencies™**

Acting Chair:  
Lisa Bartlett  
County of Orange, 5<sup>th</sup> District

February 01, 2017

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,

The Transportation Corridor Agencies, (TCA) would like to express its strong support to Caltrans for its effort to transition from the current automatic vehicle identification protocol 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 (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 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 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.

The advantages to TCA of transitioning from Title 21 to 6C include:

- Lower equipment costs and increased competition among suppliers will enable TCA to provide a superior transponder solution to our customers at a much lower cost;

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- Security features in the 6C protocol significantly reduce the potential for “tag cloning” which could result in unauthorized charges to customer accounts;
- Multiple form factors offered by 6C vendors (sticker tags, headlamp tags, switchable tags, motorcycle tags and license plate tags) will enable TCA to meet the diverse needs of our customers;
- TCA can leverage the established independent certification and testing program used by current 6C toll operators to ensure equipment interoperability in California and nationwide.

We feel that the transition deadline of January 2019 is reasonable to allow TCA 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 Samuel Johnson, Chief Toll Operations Officer at [SJohnson@thetollroads.com](mailto:SJohnson@thetollroads.com).

Respectfully,



Michael A. Kraman  
Chief Executive Officer  
Transportation Corridor Agencies

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