February 8, 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 Washington State Department of Transportation (WSDOT) would like to express its strong support for 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”), a leading-edge technology with many benefits.

WSDOT can attest to the performance and reliability of the 6C protocol after having deployed 6C at multiple tolling locations for the last 7 years. To date, 6C has been used to process nearly 100 million toll transactions in Washington state, collecting close to $300 million in toll revenue. By leveraging an internationally recognized ISO standard, partnering with other states as part of the 6C Toll Operators Coalition (6C TOC) to maintain the 6C tolling standard, and using the OmniAir Consortium for 6C equipment certification, WSDOT is able to reap benefits of low costs brought about by transponder pricing competition and common equipment testing and product offerings. With over 1 million 6C transponders distributed, WSDOT is able to procure 6C sticker transponders for as low as $1.15. This wholesale price point enables WSDOT to offer low retail prices to customers.

In addition to the cost benefits of the widespread adoption of 6C in tolling and other applications, WSDOT also gains from the large knowledge base of 6C users and suppliers as well as technology advancements that are beneficial to our operations. Some advancements have included multiple-format transponders that have provided WSDOT toll customers tremendous value, giving them many options not available previously. Finally, WSDOT has implemented the security measures available in the 6C protocol to demonstrate the capability and provide added security assurances for customers.

WSDOT is currently implementing new back office technology that will be deployed in 2019. In combination with California’s transition to 6C, those back office updates
will allow west coast toll payers to move toward regional interoperability and seamless payment technologies in the future.

WSDOT supports Caltrans in its continuing efforts to complete the regulatory change. If our staff can be of any assistance, please contact Tyler Patterson, at (206) 716-1134 or pattert@wsdot.wa.gov.

Sincerely,

[Signature]

Patty Rubstello
Assistant Secretary

TP:pr