

California Department of Transportation

DIVISION OF TRAFFIC OPERATIONS
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Questionnaire

Regarding End of Life Extension of the Title 21 Protocol for Automatic Vehicle Identification

The California Department of Transportation (Caltrans) is currently considering the development of a regulatory change that will impact one of the two automated vehicle identification (AVI) protocols currently set out in the California Code of Regulations. This protocol is referred to in the California Code of Regulations as the "Title 21 protocol".

Currently, all agencies that utilize AVI are required to discontinue using and supporting the Title 21 protocol on January 1, 2024. Caltrans has received a proposal to change this date to January 1, 2027.

Caltrans is very interested in hearing from all affected stakeholders as to their views on this proposal and will be holding a public workshop on February 28, 2023 to solicit initial comments.

In anticipation and in connection with this workshop and other activities to facilitate public participation in the regulatory process, Caltrans will be providing a questionnaire in a separate email. This information will greatly assist Caltrans as it begins the process of considering a regulatory change.

Please provide your responses following each question. Please feel free to forward this questionnaire to any other interested parties.

You may e-mail your responses to: Title.21.Changes@dot.ca.gov.

You may also submit written responses to:

Joe Rouse
Caltrans Division of Traffic Operations
1120 N Street, Mail Station 36
Sacramento, CA 95814

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Please list the name of the person completing the questionnaire and the name of the agency or company you represent.

NAME: Stephen Lockhart

AGENCY: Star Systems America, LLC; Star Systems International, Ltd. (RFID Technology Provider)

- 1) Are there any alternatives to the extending the end of life of the Title 21 protocol?

Star Systems has no comment.

- 2) What are the benefits of extending the end of life of the Title 21 protocol? What are the drawbacks?

Extending the life of the T21 protocol would allow agencies additional time to fully transition to the 6C protocol.

- 3) Please discuss any effects, including projected timetables, from extending the end of life of the Title 21 protocol.

Extending the life of the T21 protocol has no effect on Star Systems ability to manufacture and supply RFID products to the tolling industry.

- 4) Please describe any impacts from extending the protocol end of life.

Extending the life of the T21 protocol has no effect on Star Systems ability to manufacture and supply RFID products to the tolling industry.

- 5) Will the regulation affect the ability of California businesses to compete with other states by making it more costly to produce goods or services here?

From the perspective of our RFID reader development, the cost to implement the T21 protocol has already been incurred. However, the cost of a multi-protocol reader (i.e.: supports both T21 and 6C) is higher than a "single-protocol" 6C reader.

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6) What are the fiscal impacts on state and local government?

Star Systems has no comment.

7) Are there any issues regarding fairness of competition?

Star Systems has no comment.

8) Are there any issues regarding individual privacy?

Star Systems has no comment.

9) Please provide comments on any other relevant issues not addressed above.

Star Systems is not impacted in any way by extending the life of the T21 protocol.

Thank You for Completing This Questionnaire