

**California Department of Transportation - Automatic Vehicle Identification Specifications Proposed Regulation
Comments and Responses**

Comment Number	Commenter	Via	Date	Comment	Response
1	Joe Wire Golden Gate Bridge	Letter	29-Aug-23	<p>Golden Gate Bridge Highway & Transportation District supports the Caltrans Proposal to Amend California Code of Regulations Title 21, Division 2, Chapter 16: Compatibility Specifications for Automatic Vehicle Identification Equipment. Specifically, we support the time extension of the Title 21 protocol from January 1, 2024 to January 1, 2027.</p> <p>Reasons for support include the following: 1. Utilizing the useful life of the existing legacy Title 21 transponders. 2. Maximizing our investment in the legacy Title 21 transponders currently in circulation. 3. Saving money by not needing to immediately purchase new replacement 6C transponders. 4. Saving staff time by not mailing out new 6C transponders. 5. The time extension does not require any toll agency to do any additional work, since toll operators are already equipped and configured to read both protocols. 6. There are no impacts to customers.</p> <p>In conclusion, Golden Gate Bridge Highway & Transportation District supports amending the regulation granting the time extension because it utilizes current resources in the most efficient manner.</p>	<p>Thank you for your comments regarding the proposed changes to the regulation on electronic toll collection. The California Department of Transportation (Caltrans) looks forward to working with the members of the California Toll Operators Committee and the tolling industry to ensure the revised regulation meets the needs of stakeholders. If you have any questions regarding the proposed changes please contact Mr. Joe Rouse in the Division of Traffic Operations at (916) 952-6436, or by e-mail at Title.21.Changes@dot.ca.gov.</p>
2	Shahrzad Amiri LA Metro	Letter	21-Sep-23	<p>Los Angeles County Metropolitan Transportation Authority (LA Metro) supports the Caltrans Proposal to Amend California Code of Regulations Title 21, Division 2, Chapter 16: Compatibility Specifications for Automatic Vehicle Identification Equipment. Specifically, we support the time extension of the Title-21 protocol from January 1, 2024, to January 1, 2027.</p> <p>Reasons for support include the following: 1. Utilizing the useful life of the existing legacy Title-21 transponders . 2. Maximizing our investment in the legacy Title-21 transponders currently in circulation. 3. Saving money by avoiding the immediate purchase of new replacement 6C transponders . 4. Saving staff resources associated with mailing out new 6C transponders in bulk. 5. The time extension does not require any toll agency to do any additional work, since toll operators are already equipped and configured to read both protocols. 6. There are no anticipated negative impacts to customers.</p> <p>In conclusion , LA Metro appreciates amending the regulation to grant the time extension because it enables us to utilize our current resources in the most efficient manner.</p>	<p>Thank you for your comments regarding the proposed changes to the regulation on electronic toll collection. The California Department of Transportation (Caltrans) looks forward to working with the members of the California Toll Operators Committee and the tolling industry to ensure the revised regulation meets the needs of stakeholders. If you have any questions regarding the proposed changes please contact Mr. Joe Rouse in the Division of Traffic Operations at (916) 952-6436, or by e-mail at Title.21.Changes@dot.ca.gov.</p>
3	John Lowery Alameda CTC	Email	10-Oct-23	<p>The Alameda County Transportation Commission ("Alameda CTC"), as operator of the I-580 and I-680 Express Lanes in Alameda County supports the Caltrans Proposal to Amend California Code of Regulations Title 21, Division 2, Chapter 16: Compatibility Specifications for Automatic Vehicle Identification Equipment. Specifically, we support the time extension of the Title 21 protocol from January 1, 2024 to January 1, 2027.</p> <p>Reasons for support include the following: 1. Utilizing the useful life of the existing legacy Title 21 transponders. 2. Maximizing our investment in the legacy Title 21 transponders currently in circulation. 3. Saving money by not needing to immediately purchase new replacement 6C transponders. 4. Saving staff time by not mailing out new 6C transponders. 5. The time extension does not require any toll agency to do any additional work, since toll operators are already equipped and configured to read both protocols. 6. There are no impacts to customers.</p> <p>In conclusion, Alameda CTC supports amending the regulation granting the time extension because it utilizes current resources in the most efficient manner.</p>	<p>Thank you for your comments regarding the proposed changes to the regulation on electronic toll collection. The California Department of Transportation (Caltrans) looks forward to working with the members of the California Toll Operators Committee and the tolling industry to ensure the revised regulation meets the needs of stakeholders. If you have any questions regarding the proposed changes please contact Mr. Joe Rouse in the Division of Traffic Operations at (916) 952-6436, or by e-mail at Title.21.Changes@dot.ca.gov.</p>

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4	Kirk Avila OCTA	Letter	12-Oct-23	<p>The Orange County Transportation Authority (OCTA) is pleased to support the California Department of Transportation's Proposal to Amend California Code of Regulations Title 21, Division 2, Chapter 16: Compatibility Specifications for Automatic Vehicle Identification Equipment (Title 21). Specifically, we support the time extension of the Title 21 protocol from January 1, 2024, to January 1, 2027.</p> <p>OCTA finds that amending the Title 21 regulations and time extension of the protocol will be beneficial in realizing the useful life of the existing Title 21 transponders. By allowing more time, tolling agencies will take advantage of the investment in current transponders, saving money that would otherwise be used to purchase replacement transponders.</p> <p>OCTA finds that extending the protocol end of its useful life does not require any additional staff or resources from OCTA. In addition, OCTA is not concerned about the regulation affecting the ability of California businesses to compete with other states; the proposed regulatory change has no effect on procurement or support of the new 6C transponder. OCTA also does not foresee any issues regarding fairness of competition since the proposed change to the regulation is a time extension and does not change protocol specifications.</p> <p>Furthermore, the time extension will save toll agencies millions of dollars, as it does not require any toll agency to do any additional work, since toll operators are already equipped and configured to read both Title 21 and 6C protocols. Since toll operators are already equipped with multi-protocol readers, there are no anticipated fiscal impacts to the State or local governments by extending the use of the Title 21 protocol.</p> <p>Lastly, the extension of the legacy Title 21 sunset date creates an added convenience for customers who will not have to swap out their Title 21 transponder for a new 6C version.</p> <p>As a result, there is no impact on customers since they are not being asked to swap their existing Title 21 transponders. With the 405 Express Lanes soon to open in Orange County, the extension allows for more seamless delivery and operation of the express lanes to customers.</p> <p>OCTA supports amending the regulation granting the time extension because it utilizes current resources in the most efficient manner. Please do not hesitate to contact me with any questions.</p>	<p>Thank you for your comments regarding the proposed changes to the regulation on electronic toll collection. The California Department of Transportation (Caltrans) looks forward to working with the members of the California Toll Operators Committee and the tolling industry to ensure the revised regulation meets the needs of stakeholders. If you have any questions regarding the proposed changes please contact Mr. Joe Rouse in the Division of Traffic Operations at (916) 952-6436, or by e-mail at Title.21.Changes@dot.ca.gov.</p>
5	Lucinda Broussard San Diego Association of Governments	Letter	13-Oct-22	<p>San Diego Association of Governments supports the Caltrans Proposal to Amend California Code of Regulations Title 21, Division 2, Chapter 16: Compatibility Specifications for Automatic Vehicle Identification Equipment. Specifically, we support the time extension of the Title 21 protocol from January 1, 2024, to January 1, 2027.</p> <p>Reasons for support include the following</p> <ol style="list-style-type: none"> 1. Utilizing the useful life of the existing legacy Title 21 transponders. 2. Maximizing our investment in the legacy Title 21 transponders currently in circulation. 3. Saving money by not needing to immediately purchase new replacement 6C transponders. 4. Saving staff time by not mailing out new 6C transponders. 5. The time extension does not require any toll agency to do any additional work, since toll operators are already equipped and configured to read both protocols. 6. There is no impact to customers. <p>In conclusion, San Diego Association of Governments supports amending the regulation granting the time extension because it utilizes current resources in the most efficient manner.</p>	<p>Thank you for your comments regarding the proposed changes to the regulation on electronic toll collection. The California Department of Transportation (Caltrans) looks forward to working with the members of the California Toll Operators Committee and the tolling industry to ensure the revised regulation meets the needs of stakeholders. If you have any questions regarding the proposed changes please contact Mr. Joe Rouse in the Division of Traffic Operations at (916) 952-6436, or by e-mail at Title.21.Changes@dot.ca.gov.</p>
6	Tim Byrne SBCTA	Letter	13-Oct-23	<p>Thank you for taking into consideration amending the California Code of Regulations Title 21, Division 2, Chapter 16: Compatibility for Automatic Vehicle Identification Equipment. As you may be aware, while the San Bernardino County Transportation Authority (SBCTA) currently does not operate any express lanes we anticipate initiating revenue service on San Bernardino County's first express lanes project, I-10 Contract 1 from the Los Angeles County Line to I-15 in early 2024. In addition, SBCTA anticipates going to bid on the I-15 Corridor Freight and Express Lanes Project Contract 1 later this year and is currently in design for the I-10 Corridor Freight and Express Lanes Project, Contract 2, extending the express lanes easterly by approximately 11 miles.</p> <p>SBCTA supports the Caltrans Proposal to Amend California Code of Regulations Title 21, Division 2, Chapter 16: Compatibility for Automatic Vehicle Identification Equipment. Specifically, SBCTA supports an extension of the Title 21 protocol from January 1, 2024 to January 1, 2027. SBCTA believes the time extension is warranted for a variety of reasons, including, but not limited to:</p> <ul style="list-style-type: none"> • Customers experience no impacts with an extension • The time extension does not require any of the California toll agencies to do additional work since toll operators are already equipped and configured to read legacy Title 21 and new 6C transponders. • Staff time will be saved by not mailing out new 6C transponders. • Operators will save money by not needing to immediately purchase new replacement 6C transponders if legacy Title 21 transponders still remain in inventory. • More fully utilizes the useful life of the existing legacy Title 21 transponders. • Maximizes toll operator investments in the legacy Title 21 transponders currently in circulation. <p>In conclusion, SBCTA supports amending the regulation granting the time extension because it utilizes current resources in the most efficient manner and is in the best interest of our customers.</p>	<p>Thank you for your comments regarding the proposed changes to the regulation on electronic toll collection. The California Department of Transportation (Caltrans) looks forward to working with the members of the California Toll Operators Committee and the tolling industry to ensure the revised regulation meets the needs of stakeholders. If you have any questions regarding the proposed changes please contact Mr. Joe Rouse in the Division of Traffic Operations at (916) 952-6436, or by e-mail at Title.21.Changes@dot.ca.gov.</p>

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7	Jeff Gerbracht BATA	Letter	16-Oct-23	<p>The Bay Area Toll Authority (BATA) supports the Caltrans Proposal to Amend California Code of Regulations Title 21, Division 2, Chapter 16: Compatibility Specifications for Automatic Vehicle Identification Equipment. Specifically, we support the time extension of the Title 21 protocol from January 1, 2024 to January 1, 2027.</p> <p>BATA's reasons for supporting this change include the following benefits we will realize if this time extension is granted.</p> <ol style="list-style-type: none"> 1. Utilizes the useful life of the existing legacy Title 21 toll tags. 2. Maximizes our investment in the legacy Title 21 toll tags currently in circulation. 3. Saves money by not needing to immediately purchase replacement 6C toll tags. 4. Allows more time to transition the millions of customers with Title 21 tags to 6C tags. <p>BATA manages 3.2 million active Title 21 toll tags currently in circulation in the San Francisco Bay Area. To mitigate impact for customers with Title 21 toll tags who will need to replace their tag with a 6C tag, we have developed a toll tag replacement action plan to ensure a smooth transition will occur prior to the new proposed sunset date. We are certain no additional extensions will be needed past January 1, 2027.</p> <p>In conclusion, BATA supports amending the regulation granting the time extension because it utilizes our agency's resources in the most efficient manner with minimal impacts to our customers.</p>	<p>Thank you for your comments regarding the proposed changes to the regulation on electronic toll collection. The California Department of Transportation (Caltrans) looks forward to working with the members of the California Toll Operators Committee and the tolling industry to ensure the revised regulation meets the needs of stakeholders. If you have any questions regarding the proposed changes please contact Mr. Joe Rouse in the Division of Traffic Operations at (916) 952-6436, or by e-mail at Title.21.Changes@dot.ca.gov.</p>
8	Amy Potter TCA	Letter	16-Oct-23	<p>The Transportation Corridor Agencies (TCA) support the Caltrans Proposal to Amend California Code of Regulations Title 21, Division 2, Chapter 16: Compatibility Specifications for Automatic Vehicle Identification Equipment. Specifically, we support the time extension of the Title 21 protocol from January 1, 2024 to January 1, 2027.</p> <p>Reasons for support include the following:</p> <ol style="list-style-type: none"> 1. Allow remaining TCA customers with legacy Title 21 transponders to maximize useful life. 2. Maximizing TCA's own investment in remaining legacy Title 21 equipment 3. The time extension does not require any toll agency to do any additional work, since toll operators are already equipped and configured to read both protocols. 4. There are no impacts to customers. <p>In conclusion, TCA supports amending the regulation granting the time extension because it utilizes current resources in the most efficient manner.</p>	<p>Thank you for your comments regarding the proposed changes to the regulation on electronic toll collection. The California Department of Transportation (Caltrans) looks forward to working with the members of the California Toll Operators Committee and the tolling industry to ensure the revised regulation meets the needs of stakeholders. If you have any questions regarding the proposed changes please contact Mr. Joe Rouse in the Division of Traffic Operations at (916) 952-6436, or by e-mail at Title.21.Changes@dot.ca.gov.</p>
9	Tyler Patterson WSDOT	Email	16-Oct-23	<p>The Washington State Department of Transportation (WSDOT) supports the Caltrans proposal to amend California Code of Regulations Title 21, Division 2, Chapter 16: Compatibility Specifications for Automatic Vehicle Identification Equipment, where the sunset date for the Title 21 protocol is extended from January 1, 2024 to January 1, 2027. WSDOT believes this extension benefits California toll operators and Californians by extending the useful life of existing Title 21 transponders and avoids disruptions to FasTrak customers. WSDOT does not believe this extension will impact ongoing efforts between Washington and California to have electronic toll collection interoperability.</p>	<p>Thank you for your comments regarding the proposed changes to the regulation on electronic toll collection. The California Department of Transportation (Caltrans) looks forward to working with the members of the California Toll Operators Committee and the tolling industry to ensure the revised regulation meets the needs of stakeholders. If you have any questions regarding the proposed changes please contact Mr. Joe Rouse in the Division of Traffic Operations at (916) 952-6436, or by e-mail at Title.21.Changes@dot.ca.gov.</p>
10	Stephen Lockhart Star Systems	Letter	16-Oct-23	<p>Star Systems International Ltd. (SSI) and our US registered subsidiary Star Systems America LLC (SSA) fully support the extension of the T21 AVI protocol sunset date extension from 1/1/2024 to 1/1/2027 as described in the document titled "Proposed Changes to California Code of Regulations, Title 21, Section 1700.3" dated August 22nd, 2023.</p> <p>Please feel free to contact me directly with any questions.</p>	<p>Thank you for your comments regarding the proposed changes to the regulation on electronic toll collection. The California Department of Transportation (Caltrans) looks forward to working with the members of the California Toll Operators Committee and the tolling industry to ensure the revised regulation meets the needs of stakeholders. If you have any questions regarding the proposed changes please contact Mr. Joe Rouse in the Division of Traffic Operations at (916) 952-6436, or by e-mail at Title.21.Changes@dot.ca.gov.</p>
11	Casey Emoto VTA	Letter	16-Oct-23	<p>The Santa Clara Valley Transportation Authority (VTA) supports the Caltrans Proposal to Amend California Code of Regulations Title 21, Division 2, Chapter 16: Compatibility Specifications for Automatic Vehicle Identification Equipment. Specifically, we support the time extension of the Title 21 protocol from January 1, 2024, to January 1, 2027.</p> <p>VTA believes that the time extension of the Title 21 protocol has several benefits including the following:</p> <ol style="list-style-type: none"> 1. The ability to utilize the useful life of the existing legacy Title 21 transponders. 2. The ability to maximize the investment in the legacy Title 21 transponders already in circulation. 3. The provision of additional time to purchase new replacement 6C transponders. 4. The extension would not require toll agencies to do additional work, since toll operators are already equipped and configured to read both Title 21 and 6C protocols. 5. The extension would have no impacts to customers. <p>In conclusion, VTA supports amending the regulation granting the time extension because it uses existing resources in the most efficient manner.</p>	<p>Thank you for your comments regarding the proposed changes to the regulation on electronic toll collection. The California Department of Transportation (Caltrans) looks forward to working with the members of the California Toll Operators Committee and the tolling industry to ensure the revised regulation meets the needs of stakeholders. If you have any questions regarding the proposed changes please contact Mr. Joe Rouse in the Division of Traffic Operations at (916) 952-6436, or by e-mail at Title.21.Changes@dot.ca.gov.</p>

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Testimony 1	Jeff Gerbracht BATA	Public Hearing Minutes	17-Oct-23	<p>Good morning. For the record my name is Jeff Gerbracht and I work at the Bay Area Toll Authority. I'm the Principal Project Manager responsible for maintenance of the toll system at the seven state-owned toll bridges within the San Francisco Bay Area.</p> <p>I am here to speak in support of the proposed time extension for the Title 21 Protocol from January 1, 2024 to January 1, 2027.</p> <p>At BATA we have approximately 3.2 million active Title 21 toll tags in circulation, and we'd like to maximize the useful life of those tags. The proposed three-year extension would allow Title 21 tags to be slowly replaced due to attrition, a process which is already occurring at the rate of 15k tags per month. BATA is currently working with our FasTrak Customer Service Center Contractor to initiate a campaign starting next year to accelerate the current replacement rate to ensure all legacy Title 21 tags are de-activated and customers are using the new 6C protocol.</p> <p>In conclusion, BATA supports amending the regulation, because granting the time extension will allow BATA to utilize the useful life of the existing Title 21 toll tags while maximizing our investment in toll tags currently in circulation.</p> <p>Thank you.</p>	<p>Thank you for your comments regarding the proposed changes to the regulation on electronic toll collection. The California Department of Transportation (Caltrans) looks forward to working with the members of the California Toll Operators Committee and the tolling industry to ensure the revised regulation meets the needs of stakeholders. If you have any questions regarding the proposed changes please contact Mr. Joe Rouse in the Division of Traffic Operations at (916) 952-6436, or by e-mail at Title.21.Changes@dot.ca.gov.</p>
Testimony 2	Timothy Lew LA Metro	Public Hearing Minutes	17-Oct-23	<p>Hello, my name is Tim Lew and I'm speaking on behalf of Los Angeles County Metropolitan Transportation Authority, otherwise known as LA Metro regarding the amendment of the Title 21 in the California Code of Regulations. We have provided our written support of this time extension of the protocol from 2024 to January 2027. This will allow Metro to utilize the useful life of the existing transponders, maximize our investment in the title of 21 transponders currently in circulation, and allow our agency to save on staff time associated with mailing out the 6C transponders in bulk. Finally, I would like to thank staff for all their hard work on their effort. It is much appreciated and thank you for your time.</p>	<p>Thank you for your comments regarding the proposed changes to the regulation on electronic toll collection. The California Department of Transportation (Caltrans) looks forward to working with the members of the California Toll Operators Committee and the tolling industry to ensure the revised regulation meets the needs of stakeholders. If you have any questions regarding the proposed changes please contact Mr. Joe Rouse in the Division of Traffic Operations at (916) 952-6436, or by e-mail at Title.21.Changes@dot.ca.gov.</p>
Testimony 3	Arshad Syed VTA	Public Hearing Minutes	17-Oct-23	<p>Arshad Syed, Senior Transportation Engineer with the Santa Clara Valley Transportation Authority.</p> <p>VTA has an agreement with the Bay Area Toll Authority (BATA) to provide back-office and regional customer service. As such, we are one of BATA's stakeholders. I am here to support the time extension of the Title 21 protocol from January 1, 2024 to January 1, 2027. The time extension of the Title 21 protocol has several benefits that were outlined in our letter. We appreciate the opportunity to participate in the rulemaking process.</p>	<p>Thank you for your comments regarding the proposed changes to the regulation on electronic toll collection. The California Department of Transportation (Caltrans) looks forward to working with the members of the California Toll Operators Committee and the tolling industry to ensure the revised regulation meets the needs of stakeholders. If you have any questions regarding the proposed changes please contact Mr. Joe Rouse in the Division of Traffic Operations at (916) 952-6436, or by e-mail at Title.21.Changes@dot.ca.gov.</p>
Testimony 4	Stephen Lockhart Star Systems International	Public Hearing Minutes	17-Oct-23	<p>My name is Steven Lockhart. I'm with a company called Star Systems International. We are a technology provider of electronic toll collection equipment, specifically RFID readers and transponders. I just wanted to make a comment that our organization supports the extension of the Title 21 sunset period. It doesn't really represent any challenges or undue burden on our side.</p>	<p>Thank you for your comments regarding the proposed changes to the regulation on electronic toll collection. The California Department of Transportation (Caltrans) looks forward to working with the members of the California Toll Operators Committee and the tolling industry to ensure the revised regulation meets the needs of stakeholders. If you have any questions regarding the proposed changes please contact Mr. Joe Rouse in the Division of Traffic Operations at (916) 952-6436, or by e-mail at Title.21.Changes@dot.ca.gov.</p>