

Caltrans

Public Workshop Minutes

Proposed Changes to State's AVI Protocol Specifications

Workshop Conducted Virtually Using Microsoft Teams on February 28, 2023

Attendees: Joe Rouse (Caltrans), Robert Campbell (LA Metro), Reinland Jones (River County Transportation Commission - RCTC), Jennifer Crosson (RCTC), Alice Klemashevich (TransCore), Stephen Lockhart (Star Systems America), Steve Hancock (Silicon Transportation Consultants), Patrick Vu (Silicon Transportation Consultants), Brady Lauri (Kapsch), Shahrzad Amiri (LA Metro), Mark Lisenmayer (LA Metro), Patel Jaymin (Kapsch), Rick DiTullio (Golden Gate Bridge), Jeff Gerbracht (Bay Area Toll Authority - BATA), Alex Leyva (TCA), Andrew Peppard (Kapsch), Arshad Syed (Santa Clara Valley Transportation Authority - VTA), Kirk Avilla (OCTA), Murali Ramanujan (VTA), Mehul Kumar (San Mateo County Transit District - SamTrans), Martin Reyes (SamTrans), Dallin (Utah DOT), Lynn Valdivia (BATA), Monica Serrano (BATA), Shirlene Sue (Los Angeles World Airports)

Notes:

1. Joe Rouse welcome participants and stated the purpose of the workshop is to discuss the proposed change to the Title-21 protocol sunset deadline from 1/1/24 to 1/1/27, see presentation.
2. Mr. Roused solicited statements from public agencies:
 - a. BATA – Jeff Gerbracht, Principal Project Manager of the 7 bay area bridges, stated BATA has approximately 3.3M active Title-21 transponders. By extending the deadline for sunsetting the T-21 protocol, it will save BATA on immediate needs to mail out and exchange Title-21 transponders.
 - b. VTA – Murali Ramanujan, Toll Systems Manager, stated VTA is in support of the Title-21 protocol. VTA is one of several express lanes operators in the Bay Area. VTA shares the customer service back office with BATA and as an operator, VTA does not see any impacts from the time extension.
 - c. LA Metro – Robert Campbell, Project Manager, spoke in support of the Title-21 extension on behalf of LA Metro. LA Metro's distribution rate of Title-21 transponder was impacted by COVID. Therefore LA Metro still has enough Title-21 inventory to continue issuing them through 1/1/24.

To avoid disrupting customers by swapping out a recently issued transponder and to maximize the useful life of Title-21 transponders are the main reasons the sunset extension is worthwhile to pursue.

- d. RCTC – Reinland Jones, Toll Technology Manager, stated RCTC’s support of the sunset extension. Currently, 23% of transponders used by express lane customers are Title-21 protocol transponders, therefore these customers would be treated as violators if there is no extension. RCTC is responsible for \$23 Billion infrastructure constructed, so making it easier to collect tolls using transponders rather than processing violations would be more cost effective. Mr. Rouse asked for clarification on what would happen to customers still using Title-21 transponders if the extension is not grant? Jennifer Crosson stated that the tolling equipment will stop reading Title-21 transponders and vehicle license plates would be capture and processed as violations instead.
 - e. OCTA – Kirk Avila, Express Lanes Manager, spoke on behalf OCTA. This fall, OCTA will open another express lanes facility. SR 91 has approximately 160k(?) accounts. During COVID, OCTA suspended transponder issuance, so it delayed the exchange of the Title-21 transponders with 6C transponders, so an extension would allow more time for OCTA and its peer to swap transponders.
 - f. TCA – Alex Leyva, Customer Service Manager, said TCA has approximately 1.4 M Title-21 transponders and extending the sunset would be good.
 - g. LAWA – Shirlene Sue, LAWA, is working on transitioning transponders from Title-21 to 6C. Since LAWA is independent and not regulated under Title-21, the extension will not affect them.
3. Mr. Rouse asked if any of the vendors in attendance wanted to make a statement. No vendor made any statement.
 4. Mr. Rouse asked how public agencies are planning to collect and disposed of Title-21 transponders:
 - a. RCTC/OCTA – Ms. Crosson said OCTA/RCTC SR 91 used two options when swapping out Title-21 transponders 1) customers were allowed to disposed on their own 2) 20% of customers chosen to send their transponder back for disposal.
 - b. BATA - Lynn Valdivia said BATA is working on what to do regarding Title-21 transponder disposal.
 - c. LA Metro – Mr. Campbell said customers can either 1) bring in for LA Metro for disposal 2) customer can dispose on their own.
 - d. TCA – Mr. Leyva said TCA also allow customers to either dispose the transponders on their own or return them to TCA for disposal.

5. Shahzad Amiri stated on behalf of LA Metro and California Toll Operators Committee thanked Joe Rouse, Steve Hancock, and Patrick Vu for helping with the rulemaking.
6. Mr. Hancock asked for agencies to send in their prepared statements used today for incorporation into the meeting notes. Mr. Rouse said statements can be sent to this email address: title.21.changes@dot.ca.gov
7. Mr. Rouse stated Caltrans will continue with the rulemaking. The next steps will be regulator filings by Caltrans this spring which will lead to a formal 45-day commenting period, with a public hearing. Agencies will have a chance to make formal statements supporting the change.

Attachments:

Introductory Presentation
Statements from Attendee

Introductory Presentation



Public Workshop Proposed Extension to Sunset Date for “Title 21 AVI Protocol”

Logistics

- HOST: Joe Rouse, Caltrans Division of Traffic Operations
- Please provide your name and organization in the chat box
- This workshop is scheduled to end at 12:00 PM PST
 - We may end early
- Minutes will be taken



Background - AVI Protocols in California

- California uses two protocols for automatic vehicle identification
 - “Title 21”
 - 6C
- The protocols are primarily used for electronic toll collection





Background – AVI Protocols in California

- In 2017, Caltrans adopted a series of regulatory changes:
 - 6C would be established as an AVI protocol for California effective January 1, 2019
 - The 6C and Title 21 protocols could be used concurrently for a period of 5 years
 - Title 21 protocol would be discontinued starting January 1, 2024



Purpose of this Workshop

- Caltrans has received a request to change the date for discontinuing the Title 21 protocol
 - Date would be changed from January 1, 2024 to January 1, 2027
- This workshop is intended to provide all parties an opportunity to discuss this proposal in more detail

Questionnaires



- A questionnaire on this proposal was provided to all potentially interested parties
- Questionnaires are due back to Caltrans by March 3
 - Snail Mail: 1120 N Street, Mail Station 36, Sacramento, CA 95814
 - Email: title.21.changes@dot.ca.gov

CALIFORNIA STATE TRANSPORTATION AGENCY

CALIFORNIA DEPARTMENT OF TRANSPORTATION

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GAVIN NEWSOM, GOVERNOR



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 26, 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

"Provide a safe and reliable transportation network that serves all people and respects the environment"



Caltrans AVI Website

Caltrans has a website with information on the AVI protocols:
<https://dot.ca.gov/programs/traffic-operations/electronic-toll>

- This site contains links to the technical specifications
- It will also host the documents and other data associated with any planned regulatory change
 - Questionnaires
 - Materials from workshop

Workshop Format



- This is a workshop, not a hearing
 - Opportunity to have dialogue
 - Agencies that utilize AVI protocol will be called on for input
 - Will go geographically, north to south
 - Can offer general comments now, follow up with the questionnaire
 - Vendor input
 - “Open forum”
 - Opportunity to add/clarify comments

Statements from Attendees

BATA testimony for Title 21 rulemaking

Good morning (afternoon). For the record my name is _____ and I am the (title) _____ for the (organization) _____.

I am here to speak in support of California's Proposal to Amend California Code of Regulations Title 21, Division 2, Chapter 16: Compatibility Specifications for Automatic Vehicle Identification Equipment. Specifically, I support the time extension of the Title 21 protocol from January 1, 2024 to January 1, 2027.

At BATA we have about 3.3 million Title 21 transponders in circulation. During Covid-19 we temporarily suspended collecting tolls from our customers and issuing new transponders. This resulted in a longer than planned timeframe to deplete our inventory of Title 21 transponders. Also, the suspension of collecting tolls resulted in longer transponder battery life due to lack of usage.

Reasons for support include the following:

1. Utilizing the useful life of the existing 3.3million transponders.
2. Maximizing our investment in the 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 impact to customers, since they are not being asked to swap out their existing Title 21 transponders.

In conclusion, BATA supports amending the regulation granting the time extension because it utilizes current resources in the most efficient manner.

Thank you.

From: Ramanujam, Murali <Murali.Ramanujam@vta.org>
Sent: Tuesday, February 28, 2023 11:18 AM
To: Title 21 Changes@DOT <Title.21.Changes@dot.ca.gov>
Cc: Syed, Arshad <Arshad.Syed@vta.org>
Subject: Comments at the T-21 Workshop

EXTERNAL EMAIL. Links/attachments may not be safe.

Joe,
Thank you for holding the workshop today.

Here is what is said at the meeting today:
Good morning. For the record my name is Murali Ramanujam, and I am the Toll Systems Manager for the Santa Clara Valley Transportation Authority (VTA).

I am here to support the time extension of the Title 21 protocol from January 1, 2024, to January 1, 2027 as part of the California's Proposal to Amend California Code of Regulations Title 21, Division 2, Chapter 16: Compatibility Specifications for Automatic Vehicle Identification Equipment.

VTA is one of the several Express Lanes operators in the Bay Area. VTA has an agreement with Bay Area Toll Authority (BATA) to provide back-office and regional customer service. As such, we are one of BATA's stakeholder. I am here to share that VTA does not have any opposition to this amendment, and we do not see any issues related to the customers using our facilities because of this amendment.

Thank you for the opportunity to provide our input in this rulemaking process.

Murali Ramanujam
Toll Systems Manager

Santa Clara Valley Transportation Authority
3331 North First Street, Building B
San Jose, CA 95134-1927
Phone **408-952-8905**



Metro Statement for Title-21 Rulemaking

Good morning,

For the record, my name is Robert Campbell and I am a Senior Manager with the ExpressLanes team at LA Metro. I am here to speak in support of this proposed action to amend California Code of Regulations Title 21, Division 2, Chapter 16 (Compatibility Specifications for Automatic Vehicle Identification Equipment) to extend the sunset date of the legacy Title-21 protocol from January 1, 2024 to January 1, 2027.

At Metro, we have close to a million active Title-21 transponders currently in circulation. When the COVID-19 pandemic began in early 2020, we experienced a significant drop in transponder requests, and in January 2020 we also started a Pay-As-You-Go pilot that reduced the fees and penalties associated with using the ExpressLanes without FasTrak. Furthermore, when the COVID-19 pandemic began, there was a substantial and sustained decline in transaction volumes across our facilities, which helped preserve the internal batteries for Title-21 transponders already in circulation and subsequently reduced the demand for replacement transponders. The cumulative effect of all of these factors was a slower-than-anticipated depletion of our existing inventory of Title-21 transponders.

As a result, Metro estimates that it will not finish distributing its current inventory of Title-21 transponders until after January 1, 2024. Once distributed to the customer, a typical Title-21 transponder has an expected useful life of several years, meaning that Title-21 transponders entering into circulation after January 2024 are expected to continue remaining viable through 2027. By allow Title-21 transponders to remain in use through January 1, 2027, this proposed rulemaking action would allow Metro and other FasTrak agencies to take advantage of the full useful life of the remaining Title-21 transponders.

This proposed rulemaking action would also afford customers more time to become familiar and comfortable with the new transponder technology, provide for a more manageable pacing of 6C transponder order and delivery dates, and allow for a spreading out of customer service engagements over time by customers with questions or concerns about the new transponders. The net effect would be a more stable level of service center demand and better customer service experiences for users. At the same time, there are no known added costs or performance losses associated with this proposed action.

It is for these reasons that Metro supports the proposed action of amending the California Code of Regulations Title 21, Division 2, Chapter 16, to extend the sunset date of the legacy Title-21 protocol from January 1, 2024 to January 1, 2027.

Thank you.

RCTC testimony for Title 21 rulemaking

Good morning . For the record my name is Reinland Jones and I am the Toll Technology Manager for the Riverside County Transportation Commission.

I am here to speak in support of California's Proposal to Amend California Code of Regulations Title 21, Division 2, Chapter 16: Compatibility Specifications for Automatic Vehicle Identification Equipment. Specifically, I support the time extension of the Title 21 protocol from January 1, 2024 to January 1, 2027.

We operate two express lanes in Riverside County. We have purchased and issued the new 6C transponders to all of our account holders. Today 23% of the transponders in our express lanes are title 21 transponders. If we stop accepting Title 21 transponders, customers will be issued a toll evasion violation notice which is both costly and inconvenient to the motoring public.

We support the extension to

- allow us time to work with customers to get their vehicles equipped with the new 6C transponders
- allow our interoperable partners time to issue 6c transponders
- prevent the mailing of toll evasion violation notices to customers
- retain the collection of revenue by transponder which contributes to our ability to repay the \$2 billion in debt which built the express lanes

Thank you.