

California Department of Transportation

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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

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

Page 2

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

NAME: Kirk Avila

AGENCY: Orange County Transportation Authority

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

The alternative is to let the Title 21 protocol expire on January 1, 2024. However, this will create confusion for customers who continue to have Title 21 transponders. Agencies can look at the license plate of these vehicles however this is not in line with interoperable rules utilized by California Toll Operators Committee. In addition, license plate lookups would increase operating costs.

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

Extending the useful life will allow 91 Express Lanes customers to continue using their Title 21 transponders until their battery life expires. As most customers have been provided with a 6C transponder, an extension will also provide customers with more time to change out the transponder in their vehicle.

There are no drawbacks to extending Title 21 end of life since toll operators are already equipped and configured to use both the Title-21 and 6C protocols.

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

No preparation is needed for the extension of the Title-21 protocol since toll operators are already equipped and configured to use both the Title-21 and 6C protocols. OCTA is piggybacking its purchases of 6C transponders through RCTC's contract, which is competitively procured, and has purchased a large quantity.

If the extension is not granted, OCTA will have to contact customers to exchange their existing Title-21 transponders with the new 6C transponders.

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

Page 3

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

Extending does not entail any additional staff or resources from OCTA. There is no impact to customers since they are not being asked to swap their existing Title 21 transponders.

- 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?

The proposed regulatory change is a time extension to continue to use the existing Title 21 protocol and has no effect on procurement or support of the new 6C transponder and has no impact on the competitiveness of California businesses.

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

There are no anticipated fiscal impacts to State or local government by extending the use of the Title-21 protocol since toll operators are already equipped with multi-protocol readers to use both the Title-21 and 6C protocols.

- 7) Are there any issues regarding fairness of competition?

There are no issues regarding fairness of competition since the proposed change to the Regulation is a time extension on sunseting the existing Title 21 protocol and does not change protocol specifications.

- 8) Are there any issues regarding individual privacy?

The proposed change is only a time extension for continuing the use transponders already issued to customers and does not impact individual privacy.

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

There are no other issues that need to be addressed.

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

Page 4

Thank You for Completing This Questionnaire