

## 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](mailto: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**

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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:

AGENCY:

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

Most RCTC (91 and 15 Express Lanes) customers have been issued a 6C transponder. Despite providing customers with the new 6C transponder, many of these customers continue to use their Title 21 transponder. If the deadline is not extended, customers will receive a toll violation notice which will increase operating costs and inconvenience customers.

A small number of 91 Express Lanes customers still have Title 21 switchable transponders with at least three years of battery life remaining. If the deadline is not extended these customers will need to be provided with a 6C switchable transponder. This would increase transponder and mailing 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 a 6C transponder, an extension will also provide customers with more time to change out the transponder in their vehicle and avoid receiving a toll violation notice.

Approximately 23% of the transponder transactions on the 91 and 15 Express Lanes are currently Title 21 transponders issued by other California toll agencies. If the deadline is not extended these customers will be issued toll evasion violation notices.

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.

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- 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 T-21 protocol since toll operators are already equipped and configured to use both the Title-21 and 6C protocols. RCTC has competitively procured 6C transponders and purchased a large quantity.

If the extension is not granted, we will have to contact customers incentivize them to install the 6c transponders we have already provided.

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

The impacts are positive for both RCTC and the customers as it will reduce operating costs and prevent the issuance of toll evasion violation notices to cusotmers.

- 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 is no anticipated fiscal impact 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.

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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.

**Thank You for Completing This Questionnaire**