California Department of Transportation

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<u>Questionnaire</u>

<u>Regarding Adopting the 6C Coalition AVI Standard Version 4.0 In the Title 21 Protocol for Automatic Vehicle Identification (AVI) Regulation</u>

The California Department of Transportation (Caltrans) is currently considering the development of a regulatory change that would replace the "California 6C Electronic Toll Collection Standard" with the "6C Coalition AVI Version 4.0 Standard" as a Document of Reference in the AVI regulation found in Chapter 16 of Division 2 of Title 21 of the California Code of Regulations.

Caltrans would like to receive input from all interested stakeholders as to their views on this proposal and will be holding a public workshop on July 25, 2024, to solicit initial comments.

In anticipation and in connection with this workshop and other activities to facilitate public participation in the regulatory process, Caltrans is providing this questionnaire to all potential stakeholders. 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: Rick DiTullio

AGENCY: Golden Gate Bridge

1) Are there any alternatives to the replacing California 6C Electronic Toll Collection Standard with the 6C Coalition AVI Standard?

    - Replacing to the 6C Coalition AVI standard would provide minimal impacts to current toll operations. Changes to other alternatives such as other AVI protocols/standards, or Road Use Charging model would require technology and policy changes for the Agencies.

2) What are the benefits of the replacing California 6C Electronic Toll Collection Standard with the 6C Coalition AVI Standard? What are the drawbacks?

    - Benefits:

        o Consistent standards with current and/or future 6C Agency users.

        o Possible easier interoperability integrations (hub to hub, national interoperability).

        o Future expansion of 6C use by other agencies will be consistent and create easier adoption/integration with them.

        o New 6C standard AVI standards help all Agencies remain up to date with addressing identified issues or modifications (such as 'Bit-Flip', new bit allocations) with transponders.

    - Drawbacks:

        o Changes/additions to the 6C Coalition standards may impact California Agencies current operations/policies.

        o Changes or updates to standards must be agreed upon by a larger group rather than a smaller group within California.

3) Please discuss any effects, including projected timetables, from replacing California 6C Electronic Toll Collection Standard with the 6C Coalition AVI Standard.

    - Toll system software and hardware updates may be required by Toll System Integrators to have current operations to comply with 6C Coalition Standards.

    - Additional testing/verification will be needed once updates are deployed.

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- Timing impacts for any required updates, to long range plans, or procurement cycles.

4) Please describe any impacts replacing California 6C Electronic Toll Collection Standard with the 6C Coalition AVI Standard.

- Cost impacts with updating software/hardware to accept new 6C Standards

- Changes to system may not align with Agency timelines with upgrading tolling systems (may need to occur costs to upgrade system for a short period of time before transition to a new Toll system)

- Timeline to get any changes in place and coordinating with planned major toll system upgrades/replacement.

- Coordination/planning for changes and updates needed between agency roadside systems and regional back office system(s)

5) Would you support Caltrans also adopting the latest versions of the International Organization of Standardization (ISO) standard for radio frequency identification devices as part of this rulemaking?

- From a roadside toll operations perspective, adopting the latest version of the ISO standard would be supported by GGB.

6) 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 a roadside operations perspective, the regulation changes should not affect the ability for California businesses to compete with other states.

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

- From a roadside operations perspective, we anticipate minor fiscal impacts from any toll system upgrades (hardware/software) required to transition operations to the new standards.

8) Are there any issues regarding fairness of competition?

- Don't believe there will be issues in fairness of competition with adopting current standards as this can help provide a 'level playing field' among vendors providing solutions to the same standards.

9) Are there any issues regarding individual privacy?

- From a roadside operations perspective, there should not be any issues on individual privacy with ISO standards to be adopted. We would need to

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also defer to the regional back-office operations if any impacts to individual privacy would be present there.

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

- N/A

Thank You for Completing This Questionnaire