

California Department of Transportation

DIVISION OF TRAFFIC OPERATIONS
P.O. BOX 942873, MS-36 | SACRAMENTO, CA 94273-0001
(916) 654-6448 | FAX (916) 653-6080 TTY 711
www.dot.ca.gov



Questionnaire

Regarding Adopting the 6C Coalition AVI Standard

Version 4.0 In the Title 21 Protocol for Automatic Vehicle

Identification (AVI) Regulation

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

**Questionnaire Regarding Adopting the 6C Coalition AVI Standard Version 4.0 In the
Title 21 Protocol for Automatic Vehicle Identification Regulation**

Page 2

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

NAME: *Philip Chu*

AGENCY: *San Bernardino County Transportation Authority (SBCTA)*

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

SBCTA is not aware of any other alternatives that have been specifically designed and dedicated for tolling application. The 6C Coalition AVI Standard is a widely adopted protocol for tolling technology and associated with California's 6C ETC Standard.

- 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:

- As it relates to SBCTA, we understand the 6C Coalition AVI Standard is compatible with SBCTA's existing AVI system.*
- SBCTA's compliance with the 6C Coalition AVI Standard would provide consistency between SBCTA's AVI technology and other national toll operators and vendors. This has the potential to lead to cost savings for SBCTA and other California toll operators.*
- Adoption of 6C Coalition AVI Standard could support future national interoperability and avoid CTOC's need to maintain a similar but different 6C standard.*

From SBCTA's perspective, there are no drawbacks associated with adopting the 6C Coalition AVI Standard.

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

Since the 6C Coalition AVI Standard is backwards compatible, there are no impacts to any SBCTA project timelines. If adopted, SBCTA would either implement the standard as part of a system-wide upgrade or over time with future system replacements.

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

Questionnaire Regarding Adopting the 6C Coalition AVI Standard Version 4.0 In the Title 21 Protocol for Automatic Vehicle Identification Regulation

Page 3

Adopting 6C Coalition AVI Standard would require a minor AVI reader software update to recognize new transponders (either issued by CTOC or out of state) encoded to the 6C Coalition 6C AVI Standard Version 4.0.

While SBCTA does not issue transponders, a small percentage of SBCTA's customers are enrolled in discount programs with TCA, our processing partner and provider of transponders associated with our programs. Backwards compatibility with the California 6C ETC Standard should allow continuing usage of existing transponders.

- 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?

SBCTA does not have a strong opinion on this but does support adoption of standards that could lead to lower equipment costs, reduce equipment procurement lead times, and provide access to the latest 6C technology.

- 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?

SBCTA defers this response to the vendor community.

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

The proposed updates are expected to have no financial effect on SBCTA. The process for implementing AVI readers will remain unchanged from our current plans. Since the new AVI Standard works with the current California Standard, there's no requirement to replace existing readers.

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

SBCTA defers the topic of fairness to the vendor community. SBCTA does not anticipate adoption of the 6C Coalition AVI Standard will change SBCTA's procurement processes.

- 9) Are there any issues regarding individual privacy?

SBCTA understands the proposed standards do not impact Personable Identifiable Information (PII) and have not impact on individual privacy.

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

SBCTA has no other comments.

Thank You for Completing This Questionnaire