

California Department of Transportation

DIVISION OF TRAFFIC OPERATIONS
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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

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Title 21 Protocol for Automatic Vehicle Identification Regulation**

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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: Stephen Lockhart

AGENCY: Star Systems America, LLC; Star Systems International Ltd.

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

No.

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

The 6C Coalition AVI Standard is a "living" specification that is maintained by tolling agencies that use the 6C protocol as well as technology providers that build products that implement the 6C protocol. This combination of members allows the adaptation of the 6C Coalition standard into the future. Also, replacing the California 6C Electronic Toll Collection Standard reduces confusion in the market and allows stakeholders to focus on a single document.

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

No comment.

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

From the perspective of a 6C technology provider, there is no impact to our production of 6C products if the California 6C Electronic Toll Collection Standard is replaced with the 6C Coalition AVI Standard.

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?

Yes.

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?

No. This change has no impact on production costs.

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

No comment.

8) Are there any issues regarding fairness of competition?

None that I am aware of.

9) Are there any issues regarding individual privacy?

None that I am aware of.

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

The Star Systems group of companies supports this change.

Thank You for Completing This Questionnaire