

California Department of Transportation

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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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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 replacing California 6C Electronic Toll Collection Standard with the 6C Coalition AVI Standard?

No. This is the first alternative we are aware of, and we do not have a different alternative to propose.

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

Adopting the 6C Coalition AVI standard allows for national interoperability.

The potential drawback is that adoption of this standard may prevent alternatives proposed by ourselves or peer operators that differ from the 6C Coalition AVI standard, whether they be technological or legislatively driven. Weighing this against national standardization does not change our opinion favoring 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.

This adoption appears to only impact vendor procurements already underway or being executed. All new requirements to support the protocol would be included in new vendor procurements.

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

The impacts are primarily financial—that is, a vendor cost for replacement. All agencies will incur a cost should they adopt 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. Given SANDAG's involvement in the new Otay Mesa East land port of entry facility, it will enhance interoperability with any potential foreign agency.

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- 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?

At this point, it is unknown. As the standard is increasingly adopted, we expect reductions in costs across the board, thereby putting California businesses in a better competitive position.

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

We believe this depends on if, and how quickly, the standard is adopted. If this is indeed a mandated change, then timing will determine the magnitude of the fiscal impact.

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

None foreseen.

- 9) Are there any issues regarding individual privacy?

If license plate information is transmitted between out of state agencies, then there are implicit PII concerns. Otherwise, we do not have other privacy concerns.

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

We have no further comments.

Thank You for Completing This Questionnaire