

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.

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

Page 2

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

NAME: Barkev Tatevosian

AGENCY: Los Angeles County Metropolitan Transportation Authority (LA Metro)

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

The only alternative is to continue with the legislation as-is and not extend the life of the Title 21 protocol.

2) What are the benefits of extending the end of life of the Title 21 protocol? What are the drawbacks?

The benefits of extending the end of life include achieving the full useful life and associated value from existing Title-21 transponder inventory; offering customers more time to become familiar and comfortable with the new transponder technology; realizing a warranty coverage period for 6C transponders that extends further into the future as a result of more manageable pacing of 6C transponder order and delivery dates; and a spreading out of customer service engagements over time by customers with questions or concerns about the new transponders, resulting in more stable service center demand and better customer service experiences for users.

There is no added cost or performance downside to continuing to support Title-21 in the ExpressLanes.

3) Please discuss any effects, including projected timetables, from extending the end of life of the Title 21 protocol.

Anticipated effects are limited to those previously described in response to Question 2.

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

Anticipated impacts are limited to those previously described in response to Question 2.

Questionnaire Regarding End of Life Extension of the Title 21 Protocol for Automatic Vehicle Identification

Page 3

- 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 regulation will have no direct impact on businesses, as they will not have additional costs or added time commitments to continue using the ExpressLanes. There will be no direct impact on the number of users willing to use the ExpressLanes.

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

There will be no direct fiscal impact on state government.

There is an anticipated net cost savings for local government if the proposed action is implemented. This is the combined result of several interrelated effects: significant cost savings associated with avoiding premature decommissioning of existing Title-21 transponders that have useful life remaining and reduced storage and labor costs associated with a slower pacing of 6C transponder distribution.

Questionnaire Regarding End of Life Extension of the Title 21 Protocol for Automatic Vehicle Identification

Page 4

7) Are there any issues regarding fairness of competition?

No known issues.

8) Are there any issues regarding individual privacy?

No known issues.

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

No further comment.

Thank You for Completing This Questionnaire