

## 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](mailto: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: Shirlene Sue, Airport Manager, Ground Transportation Services Division

AGENCY: City of Los Angeles/Los Angeles World Airports (LAWA)

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

LAWA has been issuing 6C protocol transponders for ground transportation operators since June 2019. LAWA AVI readers are currently dual protocol for Title 21 and 6C. LAWA will conclude the phase out all Title 21 transponders for airport ground transportation operators in 2023.

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

The benefits of extension is being able to detect Title 21 transponders for access payments for operators that have not responded to the swap in transponders to 6C. The drawbacks are increased costs in maintaining the dual protocol readers. LAWA will save notable costs in purchasing 6C transponders and in purchasing and maintaining single (6c) protocol readers only.

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

LAWA will end its capabilities to read Title 21 protocols on airport property in 2023.

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

Extending the Title 21 protocol may limit LAWA's ability to read/detect vehicle activity for non-permitted, non-commercial ground transportation operators.

4) 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?

Unknown impact to business conducted outside LAWA airport property boundaries.

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

The conversion to 6C protocol only, will save LAWA costs in transponder purchases and reader purchase and maintenance. It further reduces landfill waste from Title21 case transponders and battery recycling.

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- 6) Are there any issues regarding fairness of competition?  
Transponder cost to LAWA ground transportation operators is unchanged between Title 21 and 6C.
  
- 7) Are there any issues regarding individual privacy?  
There is no change in the LAWA collection of data between Title 21 and 6C.
  
- 8) Please provide comments on any other relevant issues not addressed above.

**Thank You for Completing This Questionnaire**