

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 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

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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: ARSHAD SYED, SENIOR TRANSPORTATION ENGINEER

AGENCY: SANTA CLARA VALLEY TRANSPORTATION AUTHORITY (VTA)

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

VTA has no alternative to propose to extend the end of life of the Title 21 protocol transponders. VTA is supportive of extending the end of life of the Title 21 protocol to 2027.

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

By extending the end of life of Title 21 protocol, customers will be able to continue to use the remaining battery life of the transponders that have already been issued without having to change out to new transponder. The process of swapping out Title 21 transponders with 6C transponders can be challenging and cumbersome to both the toll operators and the customers. There are no drawbacks to extending Title 21 end of life since toll operators are already equipped and configured to use both the Title-21 and 6C protocols.

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

There are no timeline impacts to extending the end of life of Title 21 protocol as all systems are currently in place and working.

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

There are no foreseen impacts to either the customers or the toll operators.

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 proposed regulatory change is a time extension to continue using the

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already issued Title 21 protocol transponders. As new 6C transponders are already being issued today, there will be no impact to 6C transponder industry or California businesses' competitiveness.

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

There is no anticipated fiscal impact to State or local government.

7) Are there any issues regarding fairness of competition?

Since the proposed regulation is only intended to extend the time for discontinuation of Title 21 protocol, there is no concern about fairness of competition.

8) Are there any issues regarding individual privacy?

The proposed regulation is only intended to extend the time for discontinuation of Title 21 protocol, there are no issues regarding individual privacy.

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

None.

Thank You for Completing This Questionnaire