

## 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: Rick DiTullio

AGENCY: Golden Gate Bridge, Highway and Transportation District

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

The extension to the Title 21 protocol will allow toll operators to benefit from using the remaining useful battery life of transponders already issued to customers. The only alternative is not extending the discount date which require new transponders to be issued, causing disruption to customers, and additional costs to the toll collection program.

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

Toll operators and customers will be able to utilize the useful life of the existing 6 million transponders by taking advantage of the investment in the transponders currently being used and saving money by not needing to accelerate the need to purchase new replacement 6C transponders.

In addition, toll operators have not issued as many transponders as anticipated in recent years due to COVID travel restrictions and its impacts on travel patterns. Therefore, some toll operators took longer to issue their remaining Title-21 transponder inventory and some are still finishing issuing a limited number of Title-21 transponders. These recently issued Title-21 transponders have considerable useful life left.

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.

No preparation is needed for the extension of the T-21 protocol since toll operators are already equipped and configured to use both the Title-21 and 6C protocols. Toll operators have already stopped purchasing T-21 protocol

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transponders and are only issuing a small limited remaining inventory of T-21 transponders.

If the extension is not granted, toll operators will have to contact customers to exchange approximately 6 million Title 21 transponders with new 6C transponders, and additional costs to the toll collection programs will be incurred.

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

Extending does not entail any additional staff or resources from toll operators. There is no impact to customers since they are not being asked to swap their existing Title 21 transponders.

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 to use the existing Title 21 protocol and has no effect on procurement or support of the new 6C transponder and has no impact on the competitiveness of California businesses.

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

There is no anticipated fiscal impact to State or local government by extending the use of the Title-21 protocol since toll operators are already equipped with multi-protocol readers to use both the Title-21 and 6C protocols. The additional expense of procuring 6C tags at an accelerated rate would be avoided.

7) Are there any issues regarding fairness of competition?

There are no issues regarding fairness of competition since the proposed change to the Regulation is a time extension on sunseting the existing Title 21 protocol and does not change protocol specifications.

8) Are there any issues regarding individual privacy?

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The proposed change is only a time extension for continuing the use transponders already issued to customers and does not impact individual privacy.

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

There are no other issues that need to be addressed.

**Thank You for Completing This Questionnaire**