



To: Federal Communications Commission

From: Murali Ramanujam, CTOC Executive Committee Chair
Kirk Avila, CTOC Executive Committee Vice-Chair

Date: 9/4/2024

Re: Public Notice – NEXTNAV PETITION FOR RULEMAKING WT Docket No. 24-240
RM-11989

Background:

We are writing on behalf of the California Toll Operators Committee (CTOC). CTOC is a statewide collaborative organization composed of thirteen California toll facility operators/owners and California Department of Transportation (Caltrans). The Committee serves as the primary resource for interoperability, education, and advocacy among facilities in operation throughout California. CTOC members communicate regularly on issues of interoperability, technology, operating policies, customer service, the legislative, administrative, and regulatory framework for tolling, and other issues affecting tolling in California. The members of CTOC include Alameda County Transportation Commission, Bay Area Toll Authority/Bay Area Infrastructure Financing Authority/Metropolitan Transportation Commission, Caltrans, Golden Gate Bridge, Highway and Transportation District, Los Angeles County Metropolitan Transportation Authority, Orange County Transportation Authority, Riverside County Transportation Commission, San Bernadino County Transportation Authority, San Diego Association of Governments, San Francisco County Transportation Authority, San Mateo County Express Lanes Joint Powers Authority, Santa Clara Valley Transportation Authority, and Transportation Corridor Agencies.

CTOC uses a common communication standard to exchange tolling transactions across all members of the state. The unified specifications allow patrons to utilize their electronic toll device across the state. Collectively, CTOC members have invested over \$387 million in roadside toll systems which use the ISO/IEC 18000-63 (known as 6C) communication protocol for tolling applications for the purpose of automatic vehicle identification (AVI). This includes a collective 514 tolling sites with 584 RFID roadway units deployed and 20 million on-board units. CTOC processes over 460 million transactions per year worth \$1.63 billion. In January of 2019, CTOC members converted to the 6C technology to ensure we could provide reliable toll collection services well into the future.



CTOC Members Position:

CTOC is providing comment in opposition to the request by NextNav's petition request for rulemaking. All members are under varying financial debt obligations and the proposal by NextNav could impair our ability to process toll transactions with a high level of confidence due to interference and poses a risk to our operation. The NextNav proposal will affect the portion of the spectrum that California's toll operators use for electronic toll collection. This will impact our individual ability to fulfill our obligations and will disrupt our toll operations.

On behalf of all the CTOC members, we formally request the Federal Communications Commission to reject the NextNav petition for rulemaking.

Murali Ramanujam

CTOC Executive Committee Chair
Santa Clara Valley Transportation Authority
Deputy Director (Toll Systems & Traffic Eng.)

Kirk Avilla

CTOC Executive Committee Vice-Chair
Orange County Transportation Authority
General Manager