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Ms. Elizabeth Bowen

Legislative Services Office

Idaho Legislature

Dear Ms. Bowen,

My colleagues and I at D'Artagnan Consulting LLP (D'Artagnan) are pleased to provide the enclosed information in response to the request for information from the Idaho Legislature's Committee on Commercial Vehicle Annual Registration Fee. Based on our understanding of Idaho's inquiry into this topic, we believe the Committee members will find the enclosed information about commercial vehicle charging practices and possibilities of interest. If nothing else, we hope members find comfort knowing they are not alone in exploring the role of commercial vehicle fees as part of sustainable, equitable road funding policy.

We provide this information based on our team members' collective experiences formulating policy, devising concepts, and analyzing impacts for road funding initiatives around the U.S. and globally. Our team has worked on some of the world's most mature heavy vehicle weight-mileage charging systems (Oregon, New Zealand, Germany), which allows us to share our first-hand view of the opportunities and challenges of commercial vehicle charging. We also share insights from recent experiences studying or trialing commercial vehicle charging concepts for California, Indiana, the State of Western Australia, and the Commonwealth of Australia.

We look forward to the opportunity for our team to present this information to the Committee, engage with its members, and learn more about what they hope to achieve through their work.

Best regards,



Travis P. Dunn

Managing Partner

Response to Request for Information

for

Idaho Legislature's Commercial Vehicle Annual Registration Fee Committee

Submitted by

D'Artagnan Consulting

November 6, 2017

Response to RFI for Idaho Legislature’s Commercial Vehicle Annual Registration Fee Committee

Table of Contents

A. Executive Summary 2

B. Responses to Information Sought 3

C. Additional Information 10

D. Presentation..... 11

Response to RFI for Idaho Legislature's Commercial Vehicle Annual Registration Fee Committee

A. EXECUTIVE SUMMARY

D'Artagnan Consulting LLP (D'Artagnan) is North America's largest consultancy dedicated to user-based transportation revenue solutions. Established in 2011, D'Artagnan provides customized advice on transportation funding policy solutions to public agencies and policy bodies. Specifically, we address the sustainability and equity challenges of existing funding mechanisms such as fuel excise taxes and vehicle registration fees by exploring new approaches. Our team has gained specific expertise in heavy vehicle charging policies and systems, including financial analysis, charge rate setting, legal issues, operational challenges, and implementation opportunities, based on our experiences with commercial vehicle charging in California, Oregon, Indiana, New Zealand, Australia, Poland, and Germany.

Underlying our observations and suggestions to the Committee in this document is our deference to the values and priorities of those in positions to make decisions in the jurisdictions we work. Although we do not shy from offering recommendations, we always recognize the importance of considering the local stakeholder and political landscape in the formulation of policy. Instead, we focus on providing descriptions of available transportation funding policy alternatives and assessments of how those alternatives perform financially, legally, operationally, and commercially toward policy goals.

At the conclusion of this document, we suggest an approach for organizing the Committee's possible request for outside assistance in a way that affords coverage of topics that seem to be of highest import at this time. We suggest focusing on inputs and analysis that are not available to the Committee internally already. Specifically, we suggest the following:

1. Consolidate all financial analysis into a single exercise focused around building a dynamic, flexible, accessible modeling tool to explore a wide range of fee schedule alternatives and their impact on both revenue sustainability and equity;
2. Develop high-level operational alternatives for implementing registration and weight-distance operational fees, including reporting, compliance, interjurisdictional features, and audit procedures;
3. Produce a series of white papers on topics essential to formulating policy, including papers that:
 - (a) establish and prioritize objectives of the commercial vehicle fee exploration;
 - (b) provide options for adequately addressing legal questions that must be decided or addressed such as enforcement, exemptions, transition approaches, and dealing with the Interstate Commerce Clause;
 - (c) summarize recent experience with open market provision of charge collection services and certification processes for such providers; and
4. Analyze experiences elsewhere and synthesize the approaches and lessons most relevant for Idaho.

We hope the Committee finds these inputs helpful and look forward to the opportunity to engage further.

Response to RFI for Idaho Legislature's Commercial Vehicle Annual Registration Fee Committee

B. RESPONSES TO INFORMATION SOUGHT

A. Respondent's qualifications and work experience relevant to the Committee's study, including prior experience researching or consulting for a government entity

At D'Artagnan, our team has expertise in transportation funding and charging policy, operations, economics, technology, and procurement, including extensive and specific experience consulting with state transportation agencies on raising revenue for road expenditure purposes. Our experience spans registration fees, fuel taxes, distance-based charges, and other forms of charging all classes of vehicles, including heavy commercial vehicles, agricultural vehicles, and passenger cars, both in the U.S. and globally, as summarized below.

U.S. work on heavy commercial vehicle road usage charging:

- ▶ D'Artagnan was the prime contractor for the **California** Department of Transportation's (Caltrans') Road Charge Pilot Program (2015-2017). Our work included policy analysis and advice on a variety of topics including charging alternatives, rate setting, organizational design, and work with a legislatively-created stakeholder advisory group; as well as implementation work including system design, pilot test deployment, operations, analysis and reporting; and financial analysis of policy alternatives. Although the pilot focused on light vehicles, at the request of the California Trucking Association, it also featured 55 Class 8 trucks whose participation allowed exploration of technology and operational possibilities for distance-based charging of heavy commercial vehicles. D'Artagnan worked with trucking stakeholders, designed the pilot system, procured services to deliver the pilot, led the integration of truck reporting technology with the other elements of the pilot, oversaw the launch, and analyzed data reported from heavy vehicles in the pilot.
- ▶ D'Artagnan supported the analysis of a wide range of policy alternatives for revenue to support highway expenditures in **Indiana** (2014-2015), including developing a dynamic financial modeling tool to analyze a range of charging alternatives for heavy commercial vehicles based on weight, distance, and fuel consumption.
- ▶ D'Artagnan staff have close familiarity with the policy, regulatory, and commercial aspects of the **Oregon** weight-mile tax, stemming from our work to develop Oregon's light vehicle road usage charge policy and system, and from our support of commercialization of an electronic reporting option for weight-mile taxes, which launched in 2014 after several years of development and certification.
- ▶ D'Artagnan staff have close familiarity with the policy and operational aspects of the International Fuel Tax Agreement (**IFTA**) based on our research of models for multi-state road usage charge reporting for light vehicles and based on our support for commercialization of an electronic IFTA reporting option for motor carriers.

International work on commercial vehicle road usage charging:

- ▶ D'Artagnan staff have close familiarity with the Road User Charge (RUC) system for heavy vehicles in **New Zealand**, in operation since 1978. D'Artagnan's experience stems from direct involvement in the design and implementation of a Ministry of Transport policy to commercialize the provision of RUC measurement and collection, before and after the 2009 legislation allowing electronic recording and reporting of RUC.

Response to RFI for Idaho Legislature's Commercial Vehicle Annual Registration Fee Committee

- ▶ D'Artagnan is currently advising Main Roads **Western Australia** on the design, procurement, and establishment of a pilot of heavy vehicle road usage charging.
- ▶ D'Artagnan prepared a framework for the Federal Government of **Australia** in 2016-2017 to support a reform program for heavy vehicle registration and fuel taxes, and the eventual transition toward weight and distance based road usage charges nationwide.
- ▶ D'Artagnan personnel reviewed the methodologies used by the governments of **Czechia** (formerly Czech Republic) and **Poland** to set rates for their heavy vehicle distance-based road usage charging systems.
- ▶ D'Artagnan personnel reviewed the methodology used by **Germany** for identifying road infrastructure costs, allocating those costs to different types of vehicles and setting rates for heavy vehicle road usage charges for the European Commission.

For light vehicles, D'Artagnan has led or contributed in a lead role to policy development and financial and operational analyses of road funding alternatives in California, Oregon, Washington, and Hawaii (distance-based charges); Indiana (wide range of registration, fuel, tolling, and distance-based funding alternatives); Missouri (registration-based funding alternatives); and the Western Road Usage Charge Consortium (certification and multi-state reporting for light vehicles).

The remainder of this response draws on information and lessons learned through the above-referenced work.

B. Respondent's familiarity with transportation infrastructure funding policy, including opinions on the current and future reliability of transportation funding sources compared to each other, such as operating fees as compared to the fuel tax

D'Artagnan specializes in transportation infrastructure funding policy, having been established to provide bespoke advice on these matters to public agencies. We focus on policies to provide sustainable, equitable, and efficient user-based revenue alternatives for highway networks, consciously not specializing on tolls, but rather on network-wide revenue mechanisms such as registration fees and distance-based charges.

Today, fuel taxes face a sustainability challenge, as both heavy and light vehicles become increasingly fuel efficient (driven by Federal mandates such as the Corporate Average Fuel Economy standards, consumer preferences, and auto industry technology advances) and as alternative motive power sources, such as electricity, grow in market share. To date, hybrid and pure electric vehicles have predominantly been seen in light vehicle categories, but they are now emerging among heavier vehicles too. Already some manufacturers are trialing 97,000-pound all-electric trucks on roads in Europe. Over the next decade, these technological developments will further erode fuel tax revenues, while roads experience increased wear and tear from vehicle traffic.

Equally important as sustainability for policymakers is the equity of road funding policy. If the response to declining fuel tax revenues is to increase fuel tax rates, then the costs of road maintenance and construction will increasingly fall upon those with the least fuel efficient vehicles. This means that the proportion of road costs paid relates decreasingly to amount of road use (and damage caused by heavy vehicles), and increasingly to the motive power afforded by the vehicle owner. This situation will be exacerbated as the numbers of electric, hybrid, and ultra-fuel-efficient vehicles increase over time. Specifically, the relative burden of the fuel tax would continue shift to low income drivers who have less

Response to RFI for Idaho Legislature’s Commercial Vehicle Annual Registration Fee Committee

financial ability to purchase new, fuel-efficient vehicles. The less affluent tend to drive older, less fuel-efficient vehicles and pay more fuel tax per mile than those driving fuel-efficient vehicles. In contrast, higher income drivers tend to operate the newer, technology laden, fuel-efficient models. For commercial vehicles, large operators are more readily able to move toward more fuel-efficient vehicles, meaning that increases in diesel taxes are more likely to affect smaller or owner-operator truck owners or agricultural equipment owners who may have fewer alternatives.

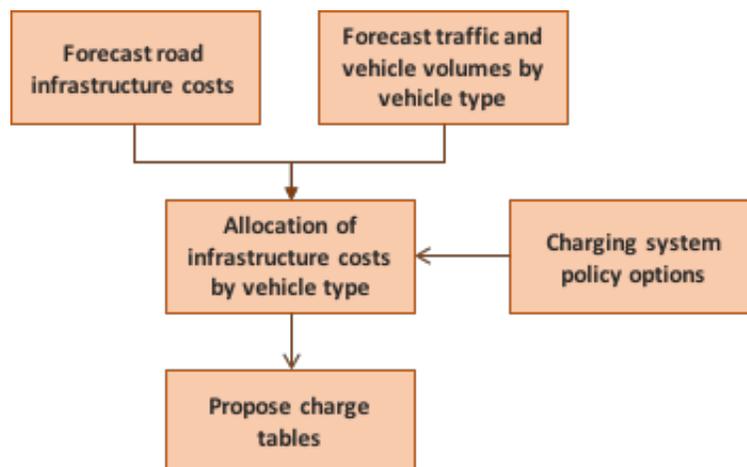
Notwithstanding the current tax and fee structure in Idaho for commercial vehicles, in most jurisdictions, revenue received from registration fees corresponds primarily to the number of registered vehicles, not utilization of the road network. Unless registration fees are linked to some level of road usage, increased vehicle use does not result in increased revenue. Although registration fees can be an effective way of recovering some fixed costs of road infrastructure (those costs not attributable to road use), and can be used to incentivize ownership of more “road-friendly” vehicle configurations, they do not respond directly to changes in road use.

Distance-based usage fees, by contrast, generate revenue related to the demand on the road network, and can be related to the wear and tear different types and weights of vehicles impose on the network, regardless of type of fuel. As demand increases, so does revenue, to match the increased road maintenance and capacity investments required by higher road demand. The main challenge with usage-based fees is having an affordable, reliable, and enforceable means to measure road use and to apply it to vehicles based in-state and for visitors. Technological advances in the past 20 years have enabled new options, and many have been implemented successfully in Oregon, New Zealand, and Europe. Usage-based fees are sustainable, reflect costs generated by different types of vehicles on the road network, and can have low administrative costs for operators and for governments. But they are not without their policy and operational challenges for implementation, some of which we explore in the remaining sections.

C. Respondent’s capacity to provide a proposed registration fee and weight-distance operating fee schedule for the State of Idaho, potentially including partial-year registration fees, with revenue projections for approximately ten years

D’Artagnan can work in collaboration with Idaho leaders and stakeholders to formulate fee schedules for vehicle ownership and operations, including registration fees and weight-distance operating rates. Our economic, policy, and operational experts have provided this type of advice for several other jurisdictions. Likewise, we can apply a range of fee policy scenarios to Idaho’s forecasts of vehicles and miles traveled to generate revenue projections.

The suggested process for developing a fee schedule is depicted in the diagram at right and described below.



Response to RFI for Idaho Legislature's Commercial Vehicle Annual Registration Fee Committee

Forecast road infrastructure costs: This step requires a definition of the revenue required to match the capital and maintenance needs of the road network over a period. This may be a forecast of actual or desired expenditure, or a forecast of depreciation in accounting terms (with desired new capital improvements added). It should also include relevant inflation for construction.

Forecast traffic and vehicle volumes by vehicle type: To inform charge rates, forecasts should include estimated numbers of registered vehicles and estimated distance traveled by vehicle class.

Charging policy options: The charging policy defines what is going to be charged or taxed to pay for road infrastructure costs. Charging policy options may include registration fees, fuel taxes, distance-based fees, or other taxes. The charging policy should define the proportion of costs that are to be recovered by each type of charge or tax, and the structure of the charges and taxes (which groups of vehicles pay different rates), so that rates can be informed by the cost allocation exercise.

Allocation of infrastructure costs by vehicle type: This process is an exercise in economic cost allocation, in which each category of road infrastructure costs is attributed to various classes of vehicles by different proportions. Infrastructure costs may be broken down into fixed costs (not based on usage) and variable/marginal cost (based on usage). In this process, various categories of capital and maintenance costs would be allocated to various vehicle types according to how these costs may either be attributed to the use of the road by different vehicle types or to the benefit obtained by different vehicle types. For purposes of the Committee's work and with the budget available, a full, financial-grade cost allocation analysis is neither advisable nor possible. For the committee's purposes, we recommend a high-level allocation of costs based on rules of thumb from a combination of existing allocations in Idaho and from neighboring jurisdictions.

Propose charge tables: The cost allocation exercise, when applied to the charging policy, will produce a recommended set of charge rates for each type of charge by each type of vehicle included. It may include any mix of registration fees and distance based charges (or other options). The resulting charge tables can be compared to existing fee structures on an individual and aggregate basis to understand their impacts on both total revenue and equity across vehicle types.

D. The Respondent's capacity to create a flexible model that could be adjusted to reflect alternative revenue goals, including the ability to predict whether the proposed registration fee and weight-distance operating fee schedule would be revenue-neutral as compared to the current system

D'Artagnan can create a flexible financial model that will enable planning of registration and weight-distance fee options to reflect alternative revenue goals. On past projects, our team members have developed revenue projections based on highly flexible inputs regarding fees including fuel taxes, registration fees, heavy vehicle distance and weight-distance charges, and light vehicle distance charges. Our models include flexibility to consider not only policy goals, but also the effects of changes to forecasted traffic volumes. Our experience with such statewide models includes Oregon, Washington, California, Indiana, and Missouri. We have the capacity to utilize data provided by Idaho on projected traffic and vehicle volumes to develop revenue forecasts for based on different policy options.

Response to RFI for Idaho Legislature's Commercial Vehicle Annual Registration Fee Committee

E. The Respondent's capacity to propose and model alternative modifications to Idaho's current fee system, such as the creation of additional distance tiers

We recommend modeling any potential revisions to the current registration fee system as part of the same model that considers alternatives, described above in D. Putting both in the same model allows easy comparison of the status quo to other alternatives, including reviewing the impact of changes on total revenue, revenue by fee type, and revenue by vehicle class. Based on the Committee's mandate, and the available budget, we advise that such a combined model focus on providing top-level outputs. We believe a detailed analysis of tens or hundreds of vehicle sub-classes would be an unnecessary exercise in precision, at greater cost, with only marginal improvement in the utility of the model outputs for legislative decision making.

F. The Respondent's capacity to provide a proposed registration fee and road usage charge schedule for the State of Idaho, with revenue projections for approximately ten years

Although D'Artagnan can develop both a registration fee and a road usage charge schedule (based on the experiences referenced above) on our own, we advise that the fee schedules be developed either in direct collaboration with committee members and/or in response to constraints articulated by Committee members. Our experts can undertake this analysis to create high-level projections based on the committee's recommended approach to splitting forecast revenues between registration fees and road usage charges. Moreover, we recommend that the development of a charging schedule either as an input to or output of the financial model, be done as part of the same model development described in areas C, D, and E.

G. The Respondent's capacity to provide cost allocation estimates on damage and wear caused to Idaho roads by commercial vehicles and heavy farm vehicles as opposed to passenger vehicles

D'Artagnan is capable of providing estimates on cost allocation for commercial and heavy farm vehicles. We have experience and expertise in the U.S. and globally on how road maintenance costs may be efficiently allocated among different types of vehicles and by different types of charges. We are closely familiar with approaches to cost allocation by vehicle type used in Oregon, New Zealand, Australia, and Germany. Depending on the types of fees and charges selected, road maintenance costs can be allocated based on:

- ▶ Costs that are fixed (unrelated to road use, e.g., due to the effects of sun, rain and snow), and
- ▶ Costs that are based on road usage (due to the effects of vehicle weight on road surfaces).

Registration fees are well-suited to recovering fixed costs, while distance-based usage fees are well-suited to recovering costs attributable to road usage. We advise that a full cost allocation study, such as those undertaken in the above-referenced jurisdictions, is not the best use of the Committee's resources. Instead, we recommend creating high-level policy options for Idaho to consider for cost allocation. A full cost allocation study can be done later and is not a necessary precursor to developing desired policy features of revised registration fees.

Response to RFI for Idaho Legislature's Commercial Vehicle Annual Registration Fee Committee

H. The Respondent's capacity to provide proposed auditing procedures for commercial vehicle and heavy farm vehicle fees, including the cost estimates for such procedures

Existing audit procedures used by Idaho and other jurisdictions for IFTA and the International Registration Plan (IRP) serve as ideal starting points for examining or proposing audit procedures for new fee structures. Distance-based fee audits can also draw on procedures used in jurisdictions with such fees. D'Artagnan has the capability to develop auditing procedures for such fees based on our ample experience in developing policies to promote compliance and enable enforcement of such fees elsewhere. We advise drawing on existing procedures to create a set of high-level procedures for Idaho.

I. The Respondent's knowledge of how other states or jurisdictions have transitioned from one fee system to another

Oregon moved to a weight distance tax for heavy vehicles in the first half of the 20th century and has updated the system several times to modernize it, including providing electronic reporting as an option beginning in 2014. New Zealand transitioned from registration and diesel taxes to a weight-distance tax in the late 1970s, modeling its system in many ways from Oregon's system. Various European countries have transitioned from time-based permit systems and registration fees towards weight-distance fees that are applied across national boundaries. Otherwise, experience with transitions are greater in the other direction, that is, from distance-based fees on commercial vehicles to fuel taxes in the latter half of the 20th century. The transition to fuel taxes was followed by a gradual transition to an integrated scheme for fuel tax reporting through IFTA as states joined together to simplify the process for commercial vehicles.

J. Respondent's capacity to provide policy recommendations to the Committee, based on the Respondent's knowledge, research, and experience

D'Artagnan has the technical capability to provide policy recommendations to the Committee based on our team's knowledge and expertise as noted in previous sections. All our team members have a background in advising policymakers on transportation funding policy and can support the development of robust options and recommendations to the Committee.

In our work we prefer to present recommendations based on equal measures of technical analysis and stakeholder feedback. The preferred solution from an economic or technical perspective is rarely the same as the ideal solution from a political or stakeholder perspective. Should we be invited to work with the Committee, our team would present the results of technical analysis of alternatives, but any recommendations would also draw on input on the Idaho political landscape from the Committee and key stakeholders identified by the Committee.

K. Suggestions the Respondent has that are relevant to the Committee's work

We suggest four additional areas for inquiry in the Committee's work as outlined below.

- ▶ First, we suggest analyzing how registration fees and/or weight-distance charge can incentivize the most road-friendly truck configurations (how many and what size of trailers), both in rate-setting and in reporting and compliance procedures. Many truck configurations can be accommodated in a new tax and fee structure, enabling more efficient use of trucking industry resources. Such efficiency improvements are a major benefit of changing tax and fee policy.

Response to RFI for Idaho Legislature's Commercial Vehicle Annual Registration Fee Committee

- ▶ We recommend the Committee consider at a high level the methods of maintaining compliance with any new fee structures, and how compliance efforts may integrate with other, existing reporting requirements (namely, IFTA and IRP, which will remain a legal reporting requirement for interstate trucks that operate in Idaho). Commercial vehicle operators often complain as much about the complexity of tax and fee reporting, and difficulty of maintaining compliance, as about the taxes and fees themselves. Other jurisdictions have found success by offering both an automated, electronic reporting option and a manual option for maintaining compliance. Fleets in Idaho currently enjoy both options for reporting IFTA and IRP. Automated options can be offered by the private sector in an “open market” of alternatives, whereby fleets select their preferred option, rather than being dictated a state-developed /operated option. We would recommend that the Committee consider an open market approach in Idaho. In our experience, governments are not well-equipped to keep pace with rapidly evolving technologies and business models for automated reporting, but are better equipped to certify and regulate the market of private sector providers for reporting and compliance.
- ▶ We recommend the Committee consider not applying usage-based fees to farm vehicles that are almost exclusively used on private land. Various jurisdictions elsewhere regard such vehicles as generating little wear and tear on the public highway network, so although they should be registered and have fees charged to contribute to the funding of the network, it is rarely equitable to seek to apply the same fees applied to other commercial vehicles to farm vehicles.
- ▶ Finally, we advise that the Committee invite industry stakeholders to learn directly about the nuts and bolts of how the policies being contemplated affect the industry. Fleet operators could present their experience with various fee systems. Technology companies could present their products for electronic reporting of fuel taxes, registration fees, and distance-based fees.

L. The Respondent's estimate for the cost of services the Respondent would provide to the Committee, and the time needed to conduct such services, if the Respondent were retained by the Legislature for the provision of such services

Budget: D'Artagnan is capable and willing to provide analysis and advisory services in support of the Committee's deliberations in all areas described in the RFI. However, the budget available does not support deep analysis of all areas, nor do we believe the Committee intends to conduct deep analysis of all the issues outlined. The list below summarizes the services we would suggest offering within the available budget. We would be happy to provide a more detailed, refined budget should the Committee prefer a subset of these activities.

1. Consolidate all financial analysis into a single exercise focused around building a dynamic, flexible, accessible modeling tool to explore a wide range of fee schedule alternatives and their impact on both revenue sustainability and equity;
2. Develop high-level operational alternatives for implementing registration and weight-distance operational fees, including reporting, compliance, interjurisdictional features, and audit procedures;
3. Produce a series of white papers on topics essential to formulating policy, including papers that: (a) establish and prioritize objectives of the commercial vehicle fee exploration; (b) provide options for addressing legal questions that must be decided or addressed such as enforcement

Response to RFI for Idaho Legislature's Commercial Vehicle Annual Registration Fee Committee

mechanisms, exemptions, transition approaches, and dealing with the Interstate Commerce Clause; (c) summarize recent experience with open market provision of charge collection services and certification processes for such providers; and

4. Analyze experiences elsewhere and synthesize the approaches and lessons most relevant for Idaho.

Schedule: We can commit to completing the above activities in 4-5 months. This assumes availability of data from the State of Idaho (presumably ITD) to support the modeling and financial analysis suggested above.

C. ADDITIONAL INFORMATION

Below are brief biographies of four of our staff with expertise in this topic and availability to support the Committee's work if desired.

Scott Wilson has 17 years of global experience in transport strategy, policy, and regulatory advice. He specializes in road usage charging studies from the high level strategic assessment of objectives and options, through to the detailed planning of policy, business rules, institutional design, business case development, and implementation advice. Since joining D'Artagnan, Scott has led a project for Main Roads Western Australia working toward a pilot demonstration of heavy vehicle charging. Previously he advised the European Commission extensively on economic policy and regulation, including the application of regulations to heavy vehicle road usage charging systems in three EU member states. Prior to his consultancy career, Scott worked for the New Zealand Ministry of Transport, where he led the development of policy for a national electronic road user charging (eRUC) scheme that became the basis for major reforms to New Zealand's national truck weight- and distance-based RUC system.

Jim Whitty conceptualized and directed all aspects of Oregon's 14-year journey through two distance charging pilot programs and legislative enactment of the first per-mile road usage charge program for light vehicles in the United States. Jim brings experience as an executive making policy recommendations and design and implementation decisions, including strategic engagement with legislators, stakeholders, and the public for road usage charging programs. As administrator to an independent policy-making body on road usage charging for Oregon, Jim successfully guided process and development of cutting-edge policies and implementations from 2001 to 2016. He combines real-world experience in funding policy development with strategic planning, program implementation, and business operations.

Shannon Crum brings more than 15 years of transportation experience as a project manager, policy analyst, and planning advisor at the state, national, and international levels in the areas of alternative road taxation, road pricing, performance measures, and infrastructure strategy. She has supported light and heavy vehicle road usage charging policy development and implementation in the U.S., including Texas, Washington, Hawaii, Colorado, and California, as well as Australia. Shannon led the technical integration of heavy commercial vehicles into California's road charging pilot, and she is currently supporting Western Australia's development of concepts for trialing heavy vehicle charging technology there.

Travis Dunn has supported road pricing research, policy development, and implementation in the U.S. and internationally for over a decade. Since joining D'Artagnan, he has performed analytical and policy work in support of distance-based charging, innovative vehicle fees, and heavy vehicle charging

Response to RFI for Idaho Legislature's Commercial Vehicle Annual Registration Fee Committee

programs. He has built flexible financial modeling tools to analyze road funding policy alternatives for clients in Oregon, California, Washington, Missouri, and Indiana. In addition, he has studied Oregon's weight-mile tax, IFTA, and IRP to support implementation of automated approaches to heavy vehicle regulatory compliance.

D. PRESENTATION

D'Artagnan is pleased to make representatives of our firm available to present this information to the Committee in person on November 9, 2017. We require a projector and screen for display of a PowerPoint presentation.