



Washington State Department of Transportation Toll Division

Proviso Report - Fiscal Year 2016, Quarter 1

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Civil Penalty Process for Toll Violations

Summary:

This section of the report is for the period July - September 2015 and addresses requirements in Section 209 (2) of 2ESHB 1299 regarding the civil penalty process for toll violations on toll facilities of the Washington State Department of Transportation.

For this period, 212,300 Notice of Civil Penalty (NOCP) transactions were issued (approximately 2.2% of total transactions). The 212,300 NOCP transactions represent \$1.1 million dollars in unpaid tolls. For this reporting period, the toll enforcement program recovered \$0.1 million in tolls and fees after debt collection costs against current period unpaid tolls and \$1.7 million against prior period unpaid tolls. As a whole, this represents 64% over the value of the toll revenue expected for the period as a result of the toll enforcement process.

For the first quarter of FY 2016, 31,480 NOCP transactions were paid without going through the adjudication process and nearly 8,400 NOCP transactions were scheduled for an administrative hearing. This represents 14.8% and 4.0% of NOCP transactions issued, respectively. NOCP recipients who did not respond by paying or requesting a hearing prior to the due date may be subject to vehicle registration holds with the Department of Licensing (DOL).

WSDOT began placing registration holds on registered owners with unpaid NOCP transactions in July 2013. Since July 2013, WSDOT has requested hold placements on approximately 170,700 vehicles representing 1.9 million unpaid toll transactions and \$10.1 million in unpaid tolls. This is approximately 1.6% of total transactions since the inception of photo tolling in December 2011. The total value of tolls, fees and civil penalties (\$40 per transaction) of these DOL hold placement requests is \$82.9 million. WSDOT has collected \$10.5 million through the DOL registration hold program.

In May 2015, the Legislature passed and the Governor signed SSB 5481 into law. This legislation sets out the following directives:

- Expands on existing administrative law judge mitigating reasons enacted in ESSB 5024 (July 2013);
- Empowers WSDOT to offer first time customers with unpaid tolls, fees and civil penalties an educational opportunity and relief from the fees and civil penalties if the underlying reason for late payment is resolved;
- Phone and/or email customers with prepaid accounts who have unpaid tolls that are about to be assessed a civil penalty;
- Make improvements to its website to allow customers to efficiently manage their accounts regardless of payment method and allows for the development of a mobile application; and
- Allow auto dealerships to sell transponders.

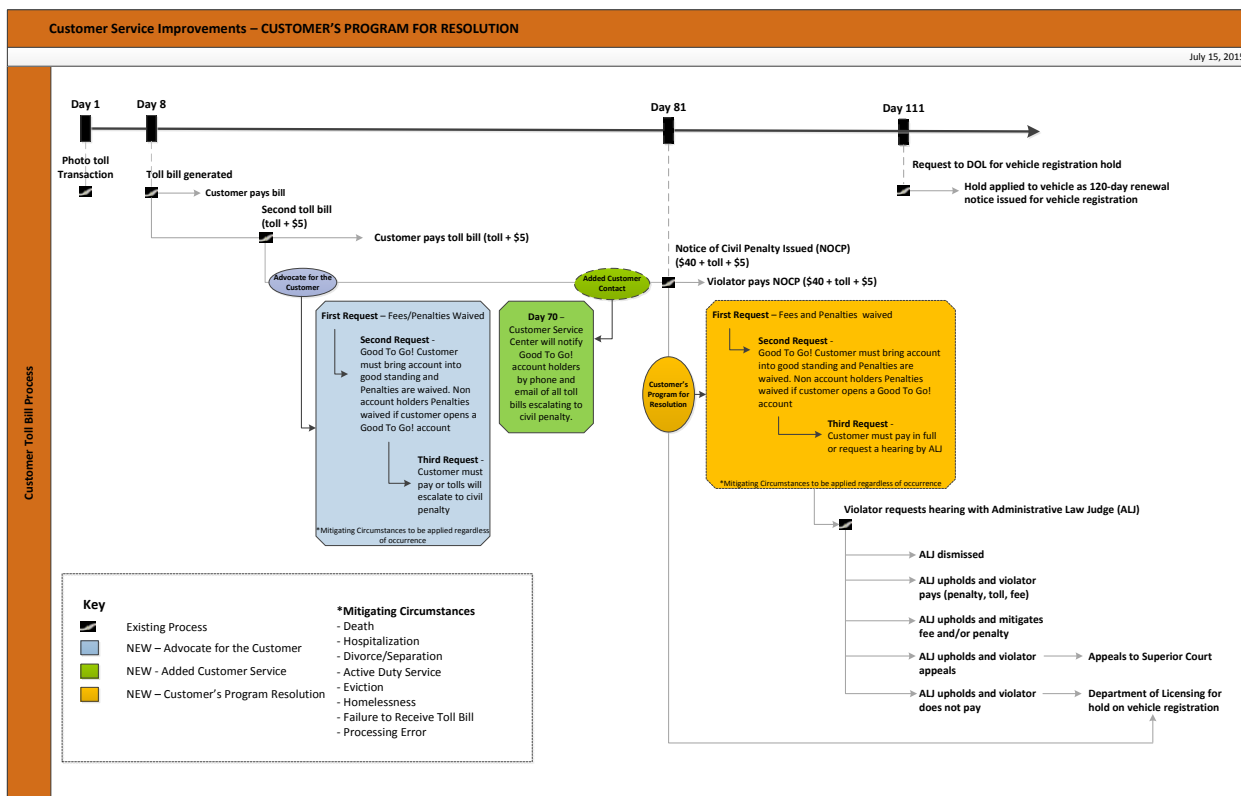
In July 2015, WSDOT initiated its new *Customer Program for Resolution* (CPR), which provides customers with unpaid tolls, fees, and penalties an opportunity to resolve the underlying issues with their late payments and have the fees and penalties waived as a one-time courtesy. If a customer has a second



challenge with late payment of tolls, fees and penalties, they can have their civil penalties waived a second time under the condition that they establish a prepaid customer account. The results of the first three months of the program are below.

The Notice of Civil Penalty (NOCP) Process (Amended with new rules from SSB 5481):

WAC 468-305-500 through 582 contains provisions related to the civil penalty process, which are consistent with RCW 46.63.160. In accordance with the rules, the Department will send an NOCP to the registered owner or renter of the vehicle who has not paid a toll within 80 days. The new processes associated with the implementation of SSB 5481 are shown in green and orange below.



Project Status:

The civil penalties assessed continued to provide consistent results during this period. Unpaid toll transactions were 2.2% of total toll transactions, which was at the lower end of the 2.2 – 2.7% range experienced over that last eight quarters.

Administrative hearing requests were down 34.2% to 2,063 this period. For reference, prior to CPR (SSB 5481), WSDOT averaged 5,300 administrative hearing requests per quarter. WSDOT expects the number of administrative hearing requests to continue to drop as customers become increasingly aware of the civil penalty relief programs offered to them without the need for an administrative hearing.



In the first three months of CPR, WSDOT:

- Received 108,486 calls on this topic, or about 11 percent of incoming calls to call center
- Dismissed 112,641 violations for 13,950 violators totaling \$3.4 million
- Is processing requests from 2,039 violators who have 11 or more civil penalties valuing \$3.6 million
- Total amount of civil penalties and reprocessing fees dismissed or in process of being dismissed: \$7M
- Total number of violators requesting CPR: 15,989 (approx. 8.7% of total violators and 10.3% of violations as of June 30, 2015)
- WSDOT has collected \$182,000 in tolls from 11,500 vehicle owners

The new CPR process focuses on resolving the underlying cause of customer late payment and on the collection of tolls. The goal is to foster timely toll payment and improve customer satisfaction with the pay by mail payment option. This focus on recovering unpaid tolls over collection of civil penalties is reflected in the amounts collected related to unpaid toll bills during the first quarter of FY 2016. WSDOT collected \$972,000 in unpaid tolls and \$1.5 million in unpaid civil penalties during the period. This represents a 170.9% increase in the amount of unpaid tolls collected, but a 44.4% reduction in the amount of unpaid civil penalties collected over the amounts collected in FY 2015 Q1. As planned, the costs related to administering the CPR process were less costly than those of administering the administrative hearing process. Therefore, WSDOT also experienced a 23.0% reduction in civil penalty enforcement costs.

Another positive result of the CPR process was seen in the number of unpaid toll transactions that were forwarded to DOL for vehicle registration hold. In FY 2016 Q1, WSDOT forwarded 9,733 SR 16 TNB transactions and 556 SR 520 Bridge transactions for registration hold. This is down from 53,565 unpaid transactions for SR 16 TNB and 77,324 unpaid transactions for SR 520 Bridge forwarded in FY 2015 Q1. For the quarter ended September 30, 2015, WSDOT collected \$1.2 million in unpaid tolls, fees, and civil penalties related to vehicle registration holds. This represents 50.2% of the total amount collected for the period.

In addition to relieving civil penalties through the CPR process, WSDOT continues to offer opportunities for relief through the Civil Penalty Mitigation process. Customers with certain mitigating reasons for late payment can receive relief through WSDOT CSC staff or, if they are not in agreement with this offer, can have their issue heard by an administrative law judge through the administrative hearing process. For the first quarter of FY 2016, administrative law judges heard 823 cases representing 5,500 unpaid toll trips and \$247,800 in unpaid tolls, fees and civil penalties. The ALJs provided relief in 553 cases associated with 3,850 unpaid toll trips and relieved \$174,000 in unpaid fees and civil penalties (70.2% of cases heard). This is a 78.6% reduction in cases heard through the administrative hearing process than were heard during the same period in FY 2015. The reduction in requests for administrative hearings was expected with the implementation of other civil penalty relief programs authorized by SSB 5481.



WSDOT CSC staff accepted mitigating reasons for 101 customers representing 1,503 unpaid toll trips and relieved \$60,120 in unpaid fees and civil penalties.

For FY 2016 Q1, WSDOT collected net cash in excess of expenses of \$421,532 and \$1,287,729 related to SR 16 Tacoma Narrows Bridge transactions and SR 520 Bridge transactions, respectively. This represents a 15.6% reduction in net cash collected over the same period last fiscal year. As was discussed above, this reduction in net cash collected was anticipated with the change in focus of collecting tolls over collecting civil penalties.

The table on the next page details the results of debt collections activities related to WSDOT's Toll Enforcement Program.

	SR 16 Tacoma Narrows Bridge				SR 520 Bridge				Fiscal Year to Date Totals			
	FY 2016 Q1	FY 2016 Q2	FY 2016 Q3	FY 2016 Q4	FY 2016 Q1	FY 2016 Q2	FY 2016 Q3	FY 2016 Q4	SR 16 TNB	SR 520 Bridge	Combined	Year over Year % Change
Number of toll transactions ¹	3,747,973				5,833,854				3,747,973	5,833,854	9,581,827	8.2%
Number of civil penalty transactions issued	79,674				132,606				79,674	132,606	212,280	-8.9%
Civil Penalty Activity Results²									Administrative Hearing Requests			
Number of civil penalty transactions paid upon receipt of the NOCP	7,606				23,865				7,606	23,865	31,471	26.8%
Number of civil penalty transactions which did not receive a response	69,327				103,046				69,327	103,046	172,373	-4.9%
Number of civil penalty transactions requesting a written dispute in lieu of in-person hearing	1,063				2,994				1,063	2,994	4,057	-66.8%
Number of civil penalty transactions requesting an in-person hearing	1,678				2,701				1,678	2,701	4,379	-70.1%
Total number of civil penalty transactions requesting adjudication	2,741				5,695				2,741	5,695	8,436	-68.6%
Vehicle Registration Hold Requests									Vehicle Registration Hold Requests			
Number of civil penalty transactions forwarded to DOL for registration hold ²	9,733				-556				9,733	-556	9,177	-93.0%
Debt Collection Cost and Revenue Collected									Debt Collection Costs and Revenue Collected			
Cash received related to civil penalty tolls ³	\$359,222				\$612,987				\$359,222	\$612,987	\$972,209	170.9%
Cash received related to \$40 civil penalty fee	\$303,553				\$1,119,528				\$303,553	\$1,119,528	\$1,423,081	-44.4%
Total cash received related to debt collection activities^{4,5}	\$662,775				\$1,732,515	\$0	\$0	\$0	\$662,775	\$1,732,515	\$2,395,290	-17.9%
Workload costs related to debt collection activities ⁶	\$241,243				\$444,786				\$241,243	\$444,786	\$686,029	-23.0%
Net cash received related to debt collection activities (Quarterly)	\$421,532				\$1,287,729	\$0	\$0	\$0	\$421,532	\$1,287,729	\$1,709,261	-15.6%
Net cash received related to debt collection activities (FY 2016 To Date)	\$421,532	\$421,532	\$421,532	\$421,532	\$1,287,729	\$1,287,729	\$1,287,729	\$1,287,729				
Civil Penalties Waived (Customer Education Program)									Civil Penalty Mitigation Results			
Number of civil penalty transactions w/civil penalty fees waived (WSDOT)	50,578				118,014				50,578	118,014	168,592	N/A
Dollar value of civil penalty fees waived (WSDOT)	\$2,090,380				\$4,877,552				\$2,090,380	\$4,877,552	\$6,967,932	N/A
Civil Penalties Waived (Mitigation Reasons)												
Number of civil penalty transactions w/civil penalty fees reduced (WSDOT Mitigation)	451				1,052				451	1,052	1,503	N/A
Dollar value of civil penalty fees reduced (WSDOT Mitigation)	\$18,036				\$42,084				\$18,036	\$42,084	\$60,120	N/A
Number of civil penalty transactions adjudicated (OAH)	2,319				3,157				2,319	3,157	5,476	-78.6%
Dollar value of civil penalty transactions adjudicated (OAH)	\$107,630				\$140,174				\$107,630	\$140,174	\$247,804	-79.0%
Number of civil penalty transactions w/civil penalty fees reduced (OAH)	1,649				2,195				1,649	2,195	3,844	-65.8%
Dollar value of civil penalty fees reduced (OAH)	\$76,518				\$97,429				\$76,518	\$97,429	\$173,947	-65.8%



Table Footnotes:

- 1) Toll transactions as reported in the monthly toll report (RTS system). SR 16 Tacoma Narrows Bridge transactions include manually collected transactions (Toll Booths). The transactions reported reflect FY 2015 Q4 transaction counts. Since NOCP transactions lag their underlying toll transactions by at least 80 days, this allows for the most accurate correlation with NOCP transactions issued.
- 2) WSDOT submits hold requests with DOL on a weekly basis. The hold request is not officially entered until 120 days prior to the vehicle's registration expiration date. For this reason, a hold request can take as long as 12 months for the registered owner to be noticed.
- 3) Civil Penalty tolls collected related to SR 520 Bridge transactions are pledged to bondholders as a part of SR 520 bond covenants.
- 4) Amounts reported represent cash received from NOCP debt collection activities.
- 5) Financial statements report total revenues earned after NOCP recipient has been found liable through an administrative hearing or deemed liable for not responding to the notice by the due date (20 days). This differs from the amount of cash collected, which is presented here.
- 6) Workload costs represent the total costs charged to each toll facility in relation to all debt collection activities during this reporting period.

Customer Service Center Procurement

Summary

This report is for the period July - September 2015 and addresses requirements in Section 209 (6) of 2ESHB 1299 regarding the anticipation of, and preparation for, the procurement of a new Washington State Department of Transportation tolling Customer Service Center. This report addresses the overall progress toward procuring a new tolling Customer Service Center, the development of a request for proposals and the department's effort to mitigate risk to the State.

Based on industry trends and advancements, the Toll Division must anticipate the replacement of the existing Customer Service Center system. The replacement will require: procurement scope - determination of what will be procured, solicitation through an open bid; contracting with the new vendor and transitioning to the new vendor. Current efforts include ongoing strategic planning to determine what to procure and the beginning stages of Request for Proposal development. The Department will continue development of the RFP documents into FY 2016 with an emphasis on completing detailed RFP requirements and preliminary budget development.

Overall Progress

As the Toll Division looks to the future needs and expectations of customer service center delivery and the additional projects coming on-line, discussion has been on-going as to what the scope of services would look like. The services are comprised of two components, the back office system, which supports



back office operations such as transaction processing, revenue tracking and accounting, and customer relationship management and the operator who provides the services. The Toll Division has identified two aspects of the back office system - the operational back office, where the transaction is created and the commercial back office, where the customer information, customer account management, and billing resides. As the Toll Division continues to develop the procurement for the customer service center, they will continue to build scope around the operational back office and the commercial back office.

WSDOT identified 6 peer agencies and 1 transit agency, which offered the best opportunity to observe a combination of varying procurement strategies and systems presented as a part of the Request For Information responses received earlier in the year. WSDOT assembled a team of four key stakeholders and planned a scan tour of these 7 peer agencies in two, 4-day trips proposed for early June, 2015 and mid-July, 2015.

Based upon the above information, this past quarter WSDOT prepared a Customer Service Center RFP Alternatives Analysis white paper that was developed to evaluate options for project delivery strategy. The analysis is timely in light of the need to replace multiple customer account systems across transportation modes in the Puget Sound region. The Toll Division needs to re-contract for a toll back office system, the Ferries Division needs to replace an antiquated ticketing system, and the regional transit agencies needs to replace the ORCA system.

The Toll Division sought to answer the following questions in the white paper:

1. What is the best approach for the state in replacing the various customer account systems, namely those utilized by the Toll Division and the Ferries Division?
2. Should WSDOT prepare for integration into a multi-modal system that could include transit and ferries?

Request for Proposal Strategic Plan and Development

The white paper presented three technology generations, along with seven timing options to deliver a CSC:

- **Generation 3 – One transportation account for all modes.**
 - **Option A:** A one-account CSC system and operation that handles customers for various types of transactions, i.e., toll, ferry or transit.
- **Generation 2 – Roadway tolling and ferry transactions.**
 - **Option A:** Procuring both a back office system and an operations vendor to process transactions generated on toll facilities as soon as possible, with the possibility of adding *Good To Go!* payment option with WSF.
 - **Option B:** Procuring both a back office system and an operations vendor to process transactions generated on toll facilities with the possibility of adding *Good To Go!* payment option with WSF. Operator transition after system vendor has been selected.
 - **Option C:** Procuring both a back office system and an operations vendor to process transactions generated on toll facilities under the 17-19 biennial budget, with the



possibility of adding *Good To Go!* payment option with WSF. Provide flexibility to transition operator early if necessary.

- **Generation 1 – Current roadway tolling functionality.**
 - **Option A:** Extend the current contract with the existing vendor providing customer service center systems (with enhancements) and operations.
 - **Option B:** Keep the current back office system (with enhancements) and procure a new operator.
 - **Option C:** Replace existing vendor through procurement of a back office system and an operator vendor with “like kind” system functionality.
 - **Option D:** Procure replacement back office system with new “like kind” system, and phase operator to solicitation after system vendor has been selected.

For Generations 2 and 3, the Toll Division assumed two contracts for CSC functionality – a back office system provided by one vendor with another vendor providing the customer service operations. The reason for analyzing this split is based on allowing more competition from the industry, along with WSDOT’s experience with a tolling systems vendor providing back office services. Another reason for pursuing two separate contracts is related to the life cycle of each service. It is not unusual for an agency to have a system nine or ten years, but change out operators in shorter time frames to emphasize customer service performance. By splitting the contracting, WSDOT will be in a position to ensure the “best of the best” is selected.

The alternatives analysis estimated the cost to procure the customer service center and estimated delivery schedules based upon the scope of the various options. A financial analysis was then performed to evaluate funding requirements of the project.



WHAT ARE THE TRADEOFFS?

Key Drivers	All Modes	Tolling & Ferry Transactions			Current Functionality			
	Gen 3	Gen 2			Gen 3			
	Opt A	Opt A	Opt B	Opt C	Opt A	Opt B	Opt C	Opt D
1 Business Continuity	○	◐	◐	◑	◑	◑	●	●
2 Quality Customer Service	◐	◐	◐	◐	◑	◐	◐	◐
3 Ability to Growth w/ WSDOT's Connecting Washington, Tolling and WSF Programs	●	●	●	●	◑	◑	●	●
4 Existing Contract Expires June 2018	○	◐	◐	◐	◑	◑	◑	◑
5 Operating Through the 2020 Decade	●	●	●	●	○	○	◐	◐
6 Provide Single Customer Account Across All Modes	●	◐	◐	◐	○	○	○	○
Full Cost to Implement	\$30 M	\$20 M	\$21 M	\$18 M	\$0	\$8 M	\$13 M	\$13 M
Added costs for WSF	\$20 M (ticketing) to \$8 M (GoodToGo) →				WSF independent	\$20 M →		
● = Fully Complies								
○ = Does Not Comply								

DRAFT FUNDING ANALYSIS RECOMMENDATIONS:

1. Determine appropriate procurement plan.
2. Upon procurement plan decision, prepare material to present to OFM, leg leadership and staff and other stakeholders.
3. Continue with already funded CSC procurement development for two RFP's' to be 'shelf-ready' waiting for legislative funding.
4. Exercise the two-year extension under ETC's contract until June 30, 2018 for operations and systems, respectively.
5. While in negotiation with ETC to exercise the two-year extension, negotiate to extend ETC's contract beyond 2018 to allow for the transition from ETC to new system vendor and new operator.
6. Develop funding strategies for solicitation and implementation of CSC system seeking full project funding in the 2017-19 biennial budget.
7. Coordinate with Ferries Division for funding strategies for solicitation and implementation of a new ticketing system and on-dock systems utilizing *Good To Go!* in the 2017-19 biennial budget.



Coordinate for business rules and IT technical requirements for system interfaces. Ferries was authorized \$315K in 15-17 to develop an RFP to replace their ticketing system.

8. Upon determination of procurement plan, solidify budget, schedule, and update all toll facility financial plans with the information to ensure consistent financial planning amongst all facilities. For facilities with no R&R reserve, pursue creation of R&R reserve to incrementally fund CSC replacement costs over time as opposed to large funding requirements (i.e., smooth the financial plan for rate setting purposes). Determine if the new Connecting Washington projects (Gateway and south end of I-405), where the legislature has indicated intent for tolling, should contribute to the new CSC system and operations contracts.
9. Further coordinate with the ORCA2 program to look for opportunities in the future that would allow the Gen 2 system to transition into a regional One-Customer Account system in the future.

Mitigation Measures

The Toll Division has taken steps to mitigate risk to the department. The contract with Electronic Transaction Consultants Corporation (ETCC), the Toll Division's Customer Service Center vendor, has been extended through June of 2016 with an additional optional two year extension to 2018. This provides stability into the future as the department works to procure a vendor with the goal of having them in place in 2018.

The procurement of a new CSC will mitigate risks in the long run by preparing the Toll Division for eventual replacement of the CSC system, allowing for the implementation of needed system upgrades. Ongoing contingency planning will help prepare the Department both for unexpected changes in the vendor services delivery and with future options to help inform the RFP process by exploring best practices moving forward.

Next Steps

In FY 2016 Q2, the Department will perform work in to areas: 1.) Contract Strategy to extend the existing ETCC contract and 2.) Project Delivery Strategy to continue with the RFP development and project planning.

Contract Strategy: With the identification of the project funding plan, WSDOT needs to incorporate the proposed schedule of the new customer service center system into the negotiations with ETCC. WSDOT is in process of developing a decision matrix to identify scope modifications, if any, and length of contract extension.

Project Strategy: WSDOT will continue to develop the project plan, present information to ERP for review of contract and project strategies, CSC of the 2020 decade visioning workshop to help inform the project scopes, project management plans, budgets, schedule and approach. The Department will continue developing the RFP documents by organizing smaller groups to concentrate on the areas of: CSC System Functionality, Contract Types and Procurement Strategies, Costs and Funding Sources, and integration with Ferries Ticketing System and DOL.



Consultant Reporting

Legislative Request:

As required by Section 209 (7) of 2ESHB 1299, the following is the quarterly report to the governor and the transportation committees of the legislature on the use of consultants in the tolling **B** program. The report includes the name of all consultants, the scope of work, the type of contract, timeliness, and deliverables and any new task orders and extensions added to the consulting contracts during the quarter reported.

Terms Defined:

For the purpose of this report the requested items were interpreted to mean the following:

Consultant: a contractor providing personal services to the Toll Division of WSDOT.

Scope of work: a general description of the contracted services.

Type of contract: contract categorization according to the Washington State Department of Enterprise Services (DES).

Timeliness: the status of task activity during the biennium.

Deliverables: a list of work products delivered during the biennium.

Summary Report:

The Toll Division's 2015-17 Biennium Program B Budget is \$85,028,000. The following is a summary of the Toll Division's consultant contracts and associated Program B expenditures during the first quarter of FY 2016 (total: \$589,761).

Consultant Name	Contract #	Title	Task Authorization Value	Total Invoiced Value
CDM Smith, Inc.	10942AI	SR 520 Actuals Analysis	\$191,015	\$24,621
Jacobs	Y-11038-BQ	CSC RFP Support	\$1,117,443	\$213,293
Engineering, Inc.	Y-11038-CE	Operations Support	\$3,056,858	\$351,847



Consultant Details for CDM Smith, Inc.:

Contract Type: Personal services

Scope Summary: Assessing the revenue potential of tolling the exiting SR 520 Bridge to support bond sales through the development of an Investment grade revenue study.

Timeliness: 7/1/15 through 6/30/17.

Deliverables: Traffic and revenue forecast to actuals analysis.

Task Order Scope and Value:

Task Name	Task Description	Task Work Order	Task Value
Y-10942-AI	SR 520 Actuals Analysis	TF0012	\$191,050

Task Y-10942-AI

Scope Summary: CDM Smith provides monthly estimated breakouts of toll forecast system for determining seasonal, monthly, and daily variations. In addition, developed methodology and performed analysis in support of monthly forecast to actual traffic and revenue reporting.

Timeliness: 7/1/15 through 6/30/17.

Deliverables: Breakouts of FY 16/17 SR 520 Bridge traffic and revenue by monthly and average daily levels, monthly reporting approach, and monthly actuals estimates.



Consultant Details for Jacobs Engineering, Inc.:

Contract Type: Personal services

Scope Summary: A broad spectrum of management and technical services via and integrated toll management team, including a co-located staff, as well as offsite services as needed.

Timeliness: Current expiration is June 30, 2021.

Deliverables: Primary focus is to provide core resource staff for technical, policy, and operations support to the Toll Division. Deliverables as requested by the state.

Task Order Scope and Value:

Task Name	Task Description	Task Work Order	Task Value
Y-11038-BQ	CSC RFP Support	TF0006, TF0007, TF0009	\$1,117,443
Y-11038-CE	Toll Operations Program, Admin & Contract Mgmt	TF0006, TF0007, TF0009, TF0014	\$3,056,858

Task Y-11038-BQ

Scope Summary: Based on industry trends and advancements, the Toll Division must anticipate the replacement of the existing Customer Service Center system. The replacement will require: procurement scope - determination of what will be procured, solicitation through an open bid; contracting with the new vendor and transitioning to the new vendor. This phase of the procurement process is to determine what to procure. There are various approaches to CSC operations management. This phase will determine which business operation method the State prefers.

Timeliness: The period of performance Task BQ is from 7/1/15 to 6/30/16.

Deliverables: The deliverables for Task BQ include Workshop materials and outcome reports, Toll Industry review and summary reports, procurement method research and recommendations (including cost and risk analysis), and Final Determination Report.

Task Y-11038-CE

Scope Summary: There are eight key work elements that make up Task Order CE for Toll Operations Support during the 15/17 biennium. Jacobs shall provide engineering and subject matter expertise to support program management, data & reporting, rate setting, policy, roadside toll system operations, adjudication and Toll finance as it relates to the Toll Division. Jacobs shall also provide experienced customer service personnel on an on-going basis to support State Project Managers with Customer Service Center vendor oversight for both operator and system functions. General operations coordination/management will also be provided between communications groups, development groups and toll division leadership.

Timeliness: Contract window: 7/1/15 through 6/30/17.

Deliverables: Level of effort contract provides approximately 5.5 FTE's of support