

Before the

**FEDERAL COMMUNICATIONS COMMISSION**

Washington, DC 20554

**In the Matter of**

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**MB Docket 13-249**

**Revitalization of the AM Radio Service**

**REPLY TO COMMENTS**

The American Association of Information Radio Operators (AAIRO.org) represents the interests of more than 350 licensees of Travelers Information Stations, both at the local and federal government levels, as well as those who maintain an interest in the TIS service. This reply to comments is in response to the FCC’s present Notice of Inquiry in which the Commission seeks comment on the threshold question of whether “opening the Expanded Band (1610-1700 kHz) to further development would be beneficial to the revitalization of the AM Radio Service.”

In Paragraph 19 of the Notice of Inquiry regarding new expanded-band stations, the Commission states that there is general consensus regarding the population of the band utilizing the “contour protection” method of station spacing versus the current “minimum distance separation” method currently employed in the expanded band.

It is noteworthy that in the 25 years since TIS stations were allowed to license on in-band channels 540-1600, precious few have done so. This is because the “contour protection” method of station spacing was used in this original AM band section. The Commission notes that this method of spacing maximizes the number of broadcast stations on a given channel. Therefore, it also minimizes the separation distances among the stations on a given channel. But TIS stations are instead allotted on the “minimum separation distance” method, which means that the mileage separation standards do not vary from the bottom to the top of the band. Therefore, where broadcast stations are most tightly crowded together (especially in the 1000-1600 kHz range) – TIS cannot comply with the separation standards and therefore TIS authorizations have not been possible to any degree.

The character of the expanded band (1610-1700 kHz) is similar in terms of signal decay rates and resulting minimum station spacing to the 1000-1600 kHz section of the legacy band just below it. Therefore, if the Commission applies “contour protection method” to frequencies

in the expanded band, TIS stations – which communities and agencies have invested in and have come to depend upon – will effectively be eradicated from those frequencies.

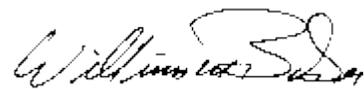
To mitigate this unfortunate outcome, we encourage the Commission to take the following into account when crafting new rules. In order of importance:

- Maintain frequencies 530 and 1610 KHz exclusively for TIS, as they effectively are now. There are no US broadcasters on these frequencies, but there are hundreds of TIS stations, both federal and local-government, utilizing them.
- Set aside 1710 AM as a new TIS frequency for licensing. This will allow an escape valve for some TIS stations that are uprooted from their current frequencies.
- Allow the population of new broadcast stations on certain expanded-band frequencies only – for example, 1620-40, 60, 80 and 1700. Leave other expanded-band channels (*e.g.*: 1630, 16–50, 1670 and 1690) for the existing broadcast stations that are operating on them currently, so they may continue to enjoy larger daytime and expanded skywave coverages. This will also make room for hundreds of TIS stations to continue operating on these frequencies and will provide further room for migration by uprooted TIS stations that cannot make use of the 1710 kHz option.

### **Conclusion**

Travelers Information Stations that predominantly operate on expanded-band frequencies, though secondary to standard broadcast stations, play a major public safety role for government agencies in all fifty of these United States. It is incumbent on the FCC, especially due to the significant public investment involved in the acquisition and maintenance of these stations' operations, to give them spectrum to continue their operations, should the expanded band become home to additional broadcasters. AAIRO believes that with careful forethought, both TIS and the vitality of its AM-band home may be maintained.

Respectfully submitted,



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