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August 28, 2008

Public Communications/Outreach Division Chief
Public Safety & Homeland Security Bureau Chief
Policy Division Chief
Federal Communications Commission
Washington, DC 20554

Subject: AAIRO's "Petition for Declaratory Ruling" – Travelers' Information Stations, Provision of Localized Public Safety and Emergency Information, Pursuant to 47 C.F.R. Section 90.242 and 90.407

The International Association of Emergency Managers, representing more than 4,000 members, works alongside a variety of nonprofit local, state, national and international organizations to achieve mutual goals of protecting life and property from disaster. In keeping with that objective, we endorse the "Petition for Declaratory Ruling" (referenced above) being submitted this year by the American Association of Information Radio Operators.

Hundreds of emergency management professionals across the country use FCC-licensed Travelers' Information Radio Stations (TIS) within multi-modal communication programs in the event of a need to transmit advisories directly to travelers during emergencies.

However, apart from its use for response, there is confusion over just when critical nonemergency messages may be broadcast to travelers as a preventive measure to mitigate the effects of future disasters upon life and property. In its Petition, the American Association of Information Radio Operators asks you to issue a clarification to Part 90.242 (TIS Rules) to assure licensees that TIS radio stations may be used to broadcast critical forecasts, advisories, evacuation and advance safety procedures on a day-to-day basis, at the discretion of licensed operators, to travelers in affected areas. This includes the ability to retransmit NOAA weather-related and all-hazard messages.

IAEM requests your positive response to the Petition. Thank you for this consideration.

Sincerely,

A handwritten signature in black ink that reads "Larry J. Gispert". The signature is written in a cursive style and is set against a light-colored, rectangular background.

Larry J. Gispert
IAEM President