

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

<b>In the Matter of</b>	)	
	)	
<b>Travelers' Information Stations</b>	)	<b>PS Docket No. 09-19</b>
	)	
<b>American Association of Information Radio Operators</b>	)	
<b>Petition for Ruling on Travelers' Information Station Rules;</b>	)	
	)	
<b>Highway Information Systems, Inc.</b>	)	<b>RM-11514</b>
<b>Petition for Rulemaking;</b>	)	
	)	
<b>American Association of State Highway &amp; Transportation Officials</b>	)	<b>RM-11531</b>
<b>Petition for Rulemaking</b>	)	

**COMMENTS REGARDING FCC REPORT & ORDER 13-98**

**I Travelers' Information Service (TIS) stations should be allowed to broadcast routine weather forecast information within the discretion of local public safety officials.**

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The American Association of Information Radio Operators<sup>1</sup> congratulates the FCC on clarifications and amendments to TIS Rules in Section 90.242 from Report & Order FCC 13-98, issued July 23, 2013. The sum of Report & Order 13-98 goes a long way toward making the TIS Service more "efficient and effective" insomuch as boundaries for allowable content are defined and reasonable discretion is afforded licensees, so critical content may be instantly broadcast to improve situational awareness of listeners.

However, AAIRO respectfully disagrees that "the broadcast of conventional forecast information is not helpful to the service or the listener." AAIRO believes that conventional weather forecasts should

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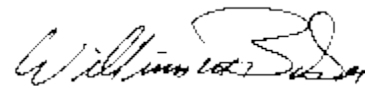
<sup>1</sup> Formed in 2008, AAIRO is a nonprofit organization of operators & licensees from public agencies who manage Information Radio Stations across the country to inform and protect motorists.

fall within the content category 'Travel Advisory,' because non-hazardous weather information could be very useful to motorists. Here are a few examples of why:

- Fair weather forecasts – let travelers know which are the best days for most efficient travel.
- Chances of precipitation – let motorcyclists and those transporting uncovered or exposed loads know if travel might be hindered.
- Temperature highs and lows – important for those transporting livestock or farm products and any motorists concerned with if/when road surfaces might freeze in cold months causing loss of traction.
- Wind speed and direction – critical for motorists driving high profile or oversized vehicles for safety and fuel economy.
- Location and timing of snow or fog – which greatly affects visibility when driving.

On behalf of its 365 members, most of whom are TIS licensees, AAIRO asks the FCC to revisit this issue and to clarify that the inclusion of a weather forecast as a 'Travel Advisory' falls within the discretion of the licensee, if the licensee believes that the forecast for his/her local area contains information that describes an imminent danger to safety of life or property.

Respectfully submitted,



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William W. Baker  
President

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Zeeland, MI 49464-0041

August 29, 2013

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**COMMENTS REGARDING FURTHER NOTICE OF PROPOSED RULEMAKING 13-98**

**I      Operation a TIS Transmitter without the audio filter should be optional, not mandatory. TIS transmitters modified to remove the filters should not require recertification.**

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AAIRO<sup>1</sup> members, as a whole, strongly support the elimination of transmitter audio filters, because they negatively impact intelligibility. However, as a practical matter, there is reason for concern. If, in the future, the FCC mandates that existing licensees may continue only with unfiltered transmitters, many smaller governmental entities would be forced to cease operation due to lack of funds for

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modifications. In a time when most agencies are looking for ways to cut costs, this requirement races in the other direction. We, therefore, urge the FCC not to require filter removal for existing licensees.

Further, if, the FCC were to mandate that all TIS licensees who wish to remove the filters must go through a new type acceptance/recertification, that requirement would present an undue financial burden, in effect preventing most from being able to make the improvement. The imposition of both the above requirements would likely cause most TIS Services to cease due to expense and logistics.

For those reasons, AAIRO asks that the FCC consider making transmitter filter removal optional for current licensees – not mandatory. This would allow operators who can afford to modify their transmitters to do so without negatively impacting those who cannot. To encourage operators to improve the TIS Service in this way, AAIRO asks the FCC to allow filtering circuitry to be removed without requiring that modified transmitters be individually recertified. We propose this in light of the fact that co-channel and first-adjacent separation standards under TIS Rules Section 90.242 are already more rigorous than for conventional broadcast stations; and voice audio, when broadcast on an unfiltered TIS station, already falls well within the NRSC mask.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "William W. Baker", is written over a horizontal line.

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