

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

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

COMMENTS REGARDING FCC REPORT & ORDER 13-98

The American Association of Information Radio Operators (AAIRO) respectfully submits these reply comments in response to comments of the Society of Broadcast Engineers (SBE) regarding the FCC’s Further Notice of Proposed Rulemaking regarding the removal of audio filtering on TIS radio transmitters.

The following SBE premise appears to be both inaccurate and exaggerated:

The FCC “does not have a good grasp of ambient RF noise levels,” [and]...removal of TIS filters would “contribute to the inability of AM broadcasters to compete in the radio marketplace”...[and therefore listeners] “will continue to migrate to the FM broadcast band...and leave AM Broadcast Stations to fail.”

Inaccurate – because FCC Commissioner Ajit Pai himself is leading discussions currently regarding the vitality of the AM band, and part of those discussions is the issue of ambient noise and the interference that is endemic to the AM band. The issue of AM noise is well known.

Exaggerated – because the SBE suggestion that allowing a wider bandwidth for tiny ten-watt TIS stations would erode AM listenership nationally is entirely devoid of merit. This is especially the case since the removal of the TIS audio filter would result in a TIS bandwidth that is no wider than what is allowed for standard broadcast stations now. All of this while FCC rules in Section 90.242 mandate that TIS stations

continue to maintain greater separations from co-channel and adjacent-channel AM stations than conventional broadcast stations must maintain.

This brings to light another inaccuracy in the SBE submittal, the assertion that

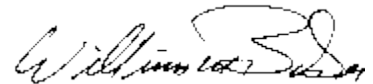
“TIS systems are only required to protect co-channel [broadcast] stations from interference according to the present TIS rules.”

On the contrary, for 36 years the FCC’s rules have required TIS stations to protect first-adjacent broadcast stations as well. FCC rule Section 90.242(a)(2)(i) requires a TIS licensee to be separated from a first-adjacent broadcast station’s 0.5 mV/m contour by a minimum of 9.3 miles.

Clearly, the current erosion of AM listening would not be hastened by making TIS stations more intelligible. Quite the opposite. The vitality of the TIS service actually has the potential to attract listeners back to the AM band to receive helpful travel advisories and emergency information when a disaster strikes.

That will not happen if TIS stations are difficult to understand.

Respectfully submitted,



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October 3, 2013