

**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) and its more than 300 members consisting of public safety agencies respectfully submits the following reply comments regarding the above referenced Further Notice of Proposed Rulemaking.

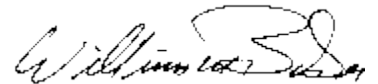
AAIRO believes that removal of the audio filters on TIS transmitters can result in improved intelligibility without negatively impacting adjacent broadcasters. However, AAIRO can also support the compromise proposed by the National Association of Broadcasters, *i.e.*, relaxation of the present 3-kHz filter on TIS transmitters to 5 kHz. The wider filter bandpass would markedly improve TIS voice transmissions and would also protect adjacent broadcasters should a TIS operator transmit non-voice material without authorization.

AAIRO submits, however, the Commission must not mandate the change to wider or unfiltered operation but must allow current 3-kHz TIS licensees to continue operating, grandfathered, so that they will not be burdened with the cost of transmitter modification in order to continue operating. It must be made clear that they may move to the wider bandwidth operation at their option.

AAIRO also respectfully requests that the FCC not require recertification of existing and new TIS transmitters to accommodate the change to wider bandwidth operation, but, instead, that it be accomplished by the simple deactivation of the present 3-kHz filter. (This may be done with the flip of a switch or the change of a jumper in modern TIS transmitters without impacting their design or construction and would not require recertification.)

If a wider bandwidth filter may be substituted in place of the present 3-kHz filter, AAIRO proposes that the filter be outboard to the TIS transmitter and immediately ahead of its audio input. The FCC should prescribe the exact formula for the audio filter and require its use by all TIS operations – new or existing – whose 3-kHz filters have been deactivated. AAIRO suggests the use of the same roll-off curve presently used in the 3-kHz filter, as it has proven to be adequate during the 30+ years of the TIS service's existence. The use of an outboard filter will streamline the timeline to improve the service and dramatically lower costs for existing operators who would otherwise be required to purchase new transmitters or have their present transmitters modified and recertified.

Respectfully submitted,

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

William W. Baker
President

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October 22, 2013