ORIGINAL

DOCKET FILE COPY ORIGINAL

Before the
Federal Communications Commission
Washington, D.C. 20554

FILED/ACCEPTED
SEP - 9 2008
Federal Communications Commission
Office of the Secretary

In the Matter of	)
	)
Travelers' Information Service	)
Provision of Localized Public Safety and Emergency Information	)
Pursuant to 47 C.F.R. Section 90.242 and 90.407	)

To: The Secretary
Attention: Chief, Public Communications and Outreach Division, Public Safety and Homeland Security Bureau, and Chief, Policy Division

PETITION FOR RULING

The American Association of Information Radio Operators ("AAIRO"), which includes State Departments of Transportation, City and County Departments of Public Safety/Emergency Management, Police and Fire, bridge authorities, airports and park districts,[1] through counsel, hereby requests a Ruling, pursuant to 47 C.F.R. Sec. 0.191(e).

Specifically, AAIRO seeks a Ruling that any message concerning the safety of life or protection of property that may affect any traveler or any individual in transit or soon to be in transit, may be transmitted on Travelers' Information Stations ("TIS"), at the sole discretion of officials authorized to operate such stations. AAIRO further seeks, in the Ruling, a clear directive that such messages, by definition, are expressly included in the permissible content categories defined by 47 C.F.R. Sec. 90.242(a)(7) (the "TIS Content Rule").

The Petitioner

The petitioner, AAIRO, includes governmental agencies and organizations responsible for or licensed to operate TIS, together with a vendor/consultant, ISS, which provides expert

[1] A list of participating agencies is attached at Exhibit A.

No. of Copies rec'd 0+4
List ABCDE
Public Safety 08-96

management and operational support to licensees both in upkeep of their technical facilities and in assembling content for TIS.

Additional Support

The International Association of Emergency Managers has formally endorsed AAIRO's efforts, here. Its letter of support is attached hereto at Exhibit B. Clearfield City, Utah is one of many communities whose public officials support AAIRO's goals in this matter. Endorsements from civic leaders of that community are included at Exhibit C.

Need for Ruling

The plain language of the TIS Content Rule allows such TIS content as ". . . road conditions, traffic hazard and travel advisories . . . ." From the very genesis of the TIS Content Rule, the Commission has made clear that such information includes "emergency messages concerning natural disasters (e.g., forest fires, floods, etc.), traffic accidents and hazards, and related bulletins affecting the immediate welfare of citizens." *Transmission of Certain Kinds of Information to the Traveling Public*, 67 FCC 2d 917 (FCC 1977) ("TIS Order") at para. 16.[2] Given this mandate, weather reports, Amber Alerts, notice of 911 outages, critical public health warnings, terrorist threat levels and other civil defense notices, fit within this particular message category that, by design, was incorporated into the TIS rubric.

Indeed, such an interpretation is entirely consistent with the intent and purposes of the "National Incident Response Plan,"[3] administered by the Department of Homeland Security

---

[2] Case law has consistently, albeit in separate decisions, distinguished between the narrow localized technical footprint that TIS must maintain (*see Thomas M. Hall,* 22 FCC Rcd 12816 (2007) (denying waiver for greater contour coverage to provide TIS to a wider service area), on the one hand, and the information content of TIS transmissions (which, as noted above, were not meant to be constrained when pertinent to travelers or relevant to the "immediate welfare of citizens."), on the other hand.

[3] Authorized by Homeland Security Presidential Directive No. 5 (Feb. 28, 2003).

as part of the "National Response Framework."[4]

In light of all the above-mentioned factors, common sense dictates that weather reports, such as NOAA Weather Radio retransmissions, are pertinent and, often, crucial to travelers. Likewise, Amber Alerts, issued as they are to aid in location of kidnapped local children, are pertinent, affecting as they do the welfare of citizens. Indeed, those on the road may well be best placed to spot an abductor and child on the run – and alert police.

It is also self-evident that traveler safety is affected when local 911 systems fail – and it is certainly pertinent to announce alternate phone numbers or contact methods on TIS transmissions. Similarly, in this post 9-11 era, terror threat alert levels are of great, and often immediate, importance to travelers – both for their own safety and for trip planning; when threats are high, travelers would be encouraged to leave extra time or perhaps alter routes, much as they would after learning of an accident blocking their usual highways of choice.[5]

---

[4] Legislative and other authority for these efforts are discussed at the Department of Homeland Security web site, www.fema.gov/pdf/emergency/nrf/nrf-authorities.pdf (visited May 19, 2008).

[5] Examples abound. Post-9-11 travel restrictions, for instance, have barred certain types of vehicles from particular sensitive roadways, as well as limited transport of explosives via many bridges and tunnels. The Ruling sought here would reassure TIS licensees that they will not face sanctions for ongoing notice of such matters (as described on the next page and in footnote 8). It would allow, for instance, a Department of Transportation (such as Arizona or Nevada) to use TIS to advise trucks and recreational vehicles of prohibitions on crossing Hoover Dam - and how they must take alternate routes due to their size and other vehicle characteristics. TIS could be utilized to transmit specific descriptions of prohibited vehicle types and other aspects of the restrictions as they relate to travelers. Such information is critical to travelers well in advance, as there is no efficient bypass around the dam, and the detour route takes drivers many hours out of their way. Similarly, the Chesepeake Bay Bridge-Tunnel could transmit a list of the prohibited chemicals, such as explosives, various gases and other ignition sources. Some Midwestern and western states could transmit information to people entering the state regarding other hazardous practices that could endanger life, property and the local environment. The state of Minnesota, for example, could inform motorists on westbound I-90 that Zebra mussels attached to pleasure boats endanger inland lakes, fish populations and city water intakes. They could advise travelers on how to clean their boats before setting sail. Similarly, Michigan could advise travelers going across the Mackinac Bridge not to transport firewood to prevent distant infestation by a timber-destroying beetle, the Emerald Ashe Borer, which (*Cont. on next page*).

Public health warnings and all manner of civil defense announcement would, logically, be likewise pertinent to travelers. Travelers, whether in transit at the moment or soon to be in transit, need to know so they can decide how, when and even whether to proceed.[6] Yet, TIS licensees have received notices of violation for transmitting such pertinent content. Most notably, FCC Field Offices have issued Notices of Violation to TIS licensees providing retransmissions of NOAA Weather Radio.[7] This has occurred despite guidelines set forth in the TIS order. These citations complained that during the time the particular TIS channels were monitored, the NOAA content being retransmitted was not "pertinent" to the TIS Content Rule. This, despite the self-evident truth that messages about weather conditions and forecasts "pertain[s] to traffic and road conditions, traffic hazard and travel advisories," because ever-changing weather affects travel conditions and resulting traffic safety instantly and more often than any other regularly occurring circumstance.[8]

(*Cont. from previous* page) has been spreading rapidly across U.S. northern woodlands. All of these are measures that will protect people and property. While not as immediate as an Interstate ice slick, they affect travelers as to how, where and what they transport – at the same time they present threats sufficient to public health, welfare and safety to warrant special notice and action. Issuance of the Ruling sought here would allow TIS operators to transmit such information to travelers without fear of sanction.

[6] The number of registered motor vehicles in the United States increased by more 70 percent, since the FCC established TIS. During this period, the number of vehicle miles driven about doubled. This added traffic and congestion makes TIS even more crucial a tool to assist a traveling public facing ever greater obstacles. Statistical Source: Federal Highway Administration at http://wwwcf.fhwa.dot.gov/policy/ohpi/hss/hsspubs.htm (visited May 19, 2008).

[7] Notable examples have arisen from TIS retransmission of NOAA weather radio reports – despite NOAA's express authorization of such relays, and the obvious traveler safety implications of weather knowledge when passing through a distant place. *E.g., City of Richmond,* Notice of Violation, EB-07-SF-237 (citing TIS licensee, *inter alia,* for transmission of NOAA weather reports, based on the theory that such weather information does not "pertain to traffic and road conditions, traffic hazard and travel advisories . . . ."); *City of Santa Monica,* EB-07-LA-216 (similar "violation" cited).

[8] TIS facilities are often configured with battery backups so that they continue to provide information even if local power is cut by storm, sabotage or utility failure.

Many NOAA Weather Radio stations provide the aptly named "Travel Weather Forecast," specifically targeted to people on the road. It includes specific, localized highway and other travel advisories. Such information clearly falls within the scope of TIS.

Travelers find the service especially useful, yet only a fraction of the population actually owns NOAA Weather Radio receivers. TIS retransmissions make wider access possible. NOAA provides such reports only on dedicated VHF frequencies, which are, unfortunately, unavailable to most drivers. Cars typically have FM and AM receivers on board – and NOAA weather radio VHF simply operates on much shorter wavelengths than typical on board car radios. Above all, NOAA permits – even encourages – retransmission of its radio content, as such retransmission clearly serves the public interest. Therefore, AAIRO believes that NOAA weather retransmissions are pertinent and unquestionably provide the type of traveler-relevant information envisioned in the TIS Order and permitted by the TIS Rule.[9]

This is true for many reasons. NOAA reports provide depth, detail and focus unlikely duplicated by AM and FM broadcast stations. Unlike most AM and FM weather reports, which are abbreviated summaries of sky conditions and temperatures, NOAA content typically provides detailed, localized forecasts and conditions that pertain in real time to a driver's actual location. This information includes: road surface traction conditions when affected by moisture and freezing; projections detailing exact areas and times when flooding is expected over precisely named roadways; traveler forecasts for a region's major roadways; seven-day extended forecasts helpful in return-route planning; detailed current information and forecasts on wind force and direction, which could prove crucial to travelers in high-profile vehicles; down-to-the-minute

[9] Many TIS Licensees have been transmitting NOAA Weather Radio for nearly 30 years. This is particularly true along inland waterways and seafronts where watercraft and recreational visitors are particularly in need of traveler weather advisories to protect life and property.

predictions detailing weather changes by geographic sector; precise weather data for different altitudes in mountainous regions, providing critical information given the vast climatic differences that may be experienced as drivers ascend and descend.

Also unique to NOAA Radio are "All-Hazard" information segments. These clearly provide pertinent lifesaving information to travelers. Topics include: marine conditions affecting travel on and in proximity to oceans and lakes, sunrise and sunset times allowing motorists to choose optimum driving times to avoid glare or difficult-to-navigate lighting, visibility data when airborne smoke, sand or dust is present in the area, as well as tips and lessons to help the traveling public identify and avoid hazardous weather conditions and to prepare for the unexpected from nature. For instance, the All-Hazard service offers checklists for in-car safety items and instructions on their use – information that could save lives should a motorist get caught in an unexpected snowstorm, hurricane, earthquake, mudslide, wildfire, volcano eruption, or flash flood. The information distributed even includes notices regarding regional power, communications or utility outages, again helping travelers better plan and execute their journeys.

TIS licensees, by retransmitting NOAA material, make "all hazard" information available to the travelers with car radios, boom boxes or any portable devices that include a standard band radio tuner. Moreover, travelers may not know where to find local news and information – nor will they necessarily find immediate relevant information even if they could locate the local news or talk leader's dial position while traveling through an unfamiliar area. NOAA weather radio retransmissions fill this crucial gap by providing extremely pertinent traveler information precisely to the travelers, who are the group which TIS was designed to serve – and provides service in an instant. On the road, an instant can make the difference between safety and

disaster. The TIS service is meeting its most important role when it helps tip the scales toward safety.[10]

Furthermore, TIS public safety licensees augment NOAA "all hazard" information with precise local content to further tailor critical information to the needs of travelers in their areas. Such direct communication efficiently and precisely delivers traveler-critical information to travelers where they are on their routes.

But enforcement actions have raised uncertainty that could cast a chill over the TIS community and its provision of such crucial traveler-pertinent information. Public agency licensees, local municipalities and other public safety officials want to transmit pertinent, potentially lifesaving, information – but have become wary, lest their agencies be sidetracked and embarrassed by FCC enforcement action. TIS is not their main business – but is simply a tool to assist in the protection of lives and property, in this instance the lives and property of travelers. If TIS efforts lead to sanctions, many reasonable agency administrators may hesitate to transmit useful information for fear of being sanctioned or may curtail TIS activities altogether. The big loser will be the traveling public – which will be deprived of an important source of pertinent and often urgent information.

If information is kept from reaching travelers, even when FCC staff is well-intentioned in its erroneous interpretation of the TIS Content Rule, people can be hurt – even killed – and property will be put at risk. This is why the Commission must issue the ruling requested here.

---

[10] In the face of well-documented recent increases in severe weather events, access to NOAA Weather Radio has become even more crucial. This is especially true, as adoption of digital technology has allowed for localized micro-forecasts providing travelers with data of previously unprecedented localized precision. This reality is evident, even as this document is filed with Commission amidst this 2008 hurricane season, which has already seen mass evacuations and damage from Gustav, Hanna and Ike.

Ultimately, nothing is more important to a traveler than arriving and returning safely. Information makes realization of those goals more likely.[11]

Crucial Protection to Save Lives, Prevent Injury and Protect Property

47 C.F.R. Sec. 90.407 ("Emergency Information Provision"), explicitly allows for TIS to communicate emergency information "during a period of emergency in which the normal facilities are disrupted as a result of a hurricane, flood, earthquake or similar disaster." Unquestionably, TIS licensees may provide emergency evacuation and other relevant information during the period of a natural disaster, hazardous materials spill, or terrorist attack and or similar emergencies.

Indeed, the "permissible communications" for all services authorized under Part 90 of the Commission's Rules, include "[any] communication related directly to the imminent safety-of-life or property. " 47 C.F.R. Sec. 405(a)(1). It is a mission TIS operators take to heart – and, through this petition, wish to ensure.

AAIRO believes that TIS's single most important role is to save lives, prevent injury and protect property. Ultimately, no reason exists to limit the public safety role TIS plays; proactive announcements are as important to lives and property as are instanteous warnings. To protect people and property, TIS licensees need a robust TIS service – and the Commission must state as much, lest the effectiveness of a crucial public safety and civil defense tool be curtailed.

---

[11] It is odd that the FCC would hinder such efforts. Clearly, the Federal Government recognizes the importance of such traveler-directed information, because federally-owned TIS facilities, coordinated by the National Telecommunications and Information Administration ("NTIA") rather than the FCC, transmit exactly this type of information in such places wholly under Federal Jurisdiction as National Parks and Forests, military bases, US Border Crossings as well as such federal campuses as the National Institutes of Health ("NIH") near Washington, DC. The NTIA's Government Master File Database (US Navy TIS 1610 kHz at China Lake, CA) specifically notes that the station is tasked to transmit "pertinent base status information to the military and local communities." Are travelers in areas under non-federal jurisdiction any less entitled to information that protects health, safety and property?

No reason exists to prevent full use of the TIS service. In establishing TIS regulations, the Commission paid homage to a pilot project in Wyoming that provided "road conditions, travel restrictions, and weather forecasts to motorists." *TIS Order* at para. 15. It seems inexplicable that similar transmission of weather information today has led to enforcement action.

The Commission must act, before additional enforcement actions undermine this important public interest and safety service.

Conclusion

No logical reason exists to hinder public safety and civil defense functions that were intended to be part of TIS. It would be illogical to engage TIS public safety tools only after an emergency situation has developed to prevent further harm when people and property could be proactively protected by provision of crucial information at all times. Therefore, the Commission must unequivocally state that proaction will NOT lead to sanction, citation or forfeiture. The rules need no rewriting – just a Ruling to alleviate confusion among regulatory personnel that public safety comes first.

Therefore, a Ruling should issue that any message concerning the safety of life or protection of property that may affect any traveler or any individual in transit or soon to be in transit, may be transmitted on Travelers' Information Stations ("TIS"), at the sole discretion of officials authorized to operate such stations.

Specifically, AAIRO seeks a Ruling that (1) weather reports, forecasts and similar forward looking information affecting traveler journeys is permissibly transmitted by TIS and (2) any emergency and safety information that has been, in good faith, determined by government

officials in charge of TIS stations to provide traveler-relevant information, may be transmitted on TIS in the normal course.

Failure to clarify this principal, as stated, would put the Commission at odds with the Communications Act, which established the FCC, in part, "for the purpose of promoting safety of life and property" through radio communication, 47 U.S.C. Sec. 151, as well as its own findings in establishing TIS services.

Respectfully submitted,

Joseph M. Di Scipio
Michael W. Richards
Counsel to American Association of Information Radio Operators

Fletcher, Heald & Hildreth, P.L.C.
1300 North 17th Street, 11th Floor
Arlington, VA 22209
(703) 812-0400

September 9, 2008

EXHIBIT A

AAIRO MEMBERS

Agency	City	State
Hudson County Emergency Management	Secaucus	NJ
Wayne County Airport Authority	Detroit	MI
State of Colorado Telecomm Services	Glenwood Springs	CO
City of Beverly Hills	Beverly Hills	CA
City of Malibu	Malibu	CA
Salt Lake Department of Airports	Salt Lake City	UT
South Houston OEM	Houston	TX
University of California Santa Barbara	Santa Barbara	CA
Lake County Division of Transportation	Libertyville	IL
State University of New York Buffalo SUNY	Amherst	NY
Los Alamos County OEM	Los Alamos	NM
California State University Fresno	Fresno	CA
Northrop Grumman IT	Kettering	OH
City of Charleston Police Dept	Charleston	SC
General Mitchell International Airport	Milwaukee	WI
Saint Charles Parish Emergency Preparedness	Hahnville	LA
California State University Long Beach Police	Long Beach	CA
City of Lansing Michigan	Lansing	MI
Texas Children's Hospital	Houston	TX
Galveston County Office of Emergency Management	Dickinson	TX
City of Orlando Office of Emergency Management	Orlando	FL
Kansas City Aviation Department	KANSAS CITY	MO
Lower Colorado River Authority	Austin	TX
Port of Portland	Portland	OR
City of Gadsden	Gadsden	AL
Fort Bend County	Richmond	TX
Fort Bend County CERT	Richmond	TX
Fort Bend County Constable	Richmond	TX
Fort Bend County Constables Office Precinct 3	Sugar Land	TX
Fort Bend County Emergency Management	Richmond	TX
Fort Bend County Health and Human Services	Rosenberg	TX
Wildland Residents Association San Marcos Pass VFD	Santa Barbara	CA
Information Station Specialists Inc	Zeeland	MI
All Warning Systems Inc	Hudsonville	MI
Alpine County Sheriff	Markleeville	CA
Ashland Fire and Rescue	Ashland	OR
Battle Creek Emergency Services Homeland Security	Battle Creek	MI
BayComm Inc	Wilmington	DE
Berry Creek Fire Safe Council	Berry Creek	CA

Agency	City	State
Borough of Avalon	Avalon	NJ
Braniff Communications Inc	Crestwood	IL
Brazos County Texas	Bryan	TX
Brookside Village OEM	Pearland	TX
Burlington County	Westampton	NJ
Butte County Fire Safe Council	Paradise	CA
Cass County	Fargo	ND
Chesterfield County Radio Shop	Chesterfield	VA
Chusei USA	Pasadena	TX
Cinnaminson Township Police Department	Cinnamnson	NJ
City of Auburn	Auburn	WA
City of Aurora	Aurora	IL
City of Baytown	Baytown	TX
City of Beasley	Beasley	TX
City of Brigantine Police Department/OEM	Brigantine	NJ
City of Coral Springs	Coral Springs	FL
City of Cranford	Cranford	NJ
City of Cuyahoga Falls	Cuyahoga Falls	OH
City of Ellendale	Ellendale	ND
City of Farmers Branch Fire Department	Farmers Branch	TX
City of Fort Stockton	Fort Stockton	TX
City of Issaquah	Issaquah	WA
City of Keller	Keller	TX
City of La Porte OEM	La Porte	TX
City of Libby	Libby	MT
City of Long Branch	Long Branch	NJ
City of Marysville	Marysville	MI
City of Missouri City	Missouri City	TX
City of North Miami Beach Police Dept	North Miami Beach	FL
City of Orchard	Orchard	TX
City of Puyallup	Puyallup	WA
City of Redmond OEM	Redmond	WA
City of Richmond	Richmond	CA
City of Santa Paula Fire	Santa Paula	CA
City of Sugar Land	Sugar Land	TX
City of Tukwila	Tukwila	WA
City of Urbandale Iowa	Urbandale	IA
City of Weslaco	Weslaco	TX
City of Weston	Weston	FL
Clearfield City Corp	Clearfield	UT
Clifton Office of Emergency	Clifton	NJ
County of Burlington Public Safety	Westampton	NJ

Agency	City	State
County of Hudson	Jersey City	NJ
Culver City Fire Department	Culver City	CA
Dickey County Emergency Mgmt	Ellendale	ND
El Segundo Fire Dept	El Segundo	CA
Fairchild Fire Department	Needville	TX
Foster City Police Department	Foster City	CA
Frontline Systems	Roseburg	OR
George Foundation	Richmond	TX
Geosun International	Missouri City	TX
Hanover County Emergency Communications Dept	Hanover	VA
Hennes Communications	Cleveland	OH
Home Port Alliance for Battleship New Jersey	Camden	NJ
Irvine Department of Public Safety	Irvine	CA
Irvine Police Department	Irvine	CA
Kankakee County Sheriffs Police	Kankakee	IL
Katy Independent School District	Katy	TX
Katy Police Dept	Katy	TX
Kent County Department of Aeronautics	Grand Rapids	MI
Knapp Medical Center	Weslaco	TX
La Habra Heights FireSafe Council (LHHFW)	La Habra Heights	CA
Lake Havasu City Police Department	Lake Havasu City	AZ
Lincoln County Public Health Department	Libby	MT
Lyndhurst Township Police and Emergency Mgmt	Lyndhurst	NJ
Manville Emergency Management	Manville	NJ
Manville Fire Department	Manville	NJ
Middletown Township Office of Emergency Management	Middletown	NJ
Montgomery County Emergency Management	Montgomery	TX
Murray City Fire Department	Murray	UT
Needville Police Department	Needville	TX
North Arlington Police Department	North Arlington	NJ
North of the River Municipal Water District	Oildale	CA
North Wildwood Police Department	North Wildwood	NJ
Ocean City Police Department	Ocean City	NJ
Oconee County	Watkinsville	GA
Palatine Emergency Management Agency	Palatine	IL
Peapack & Gladstone Police Department	Peapack	NJ
Pecan Grove Fire Dept and Memorial Hermann Hospital	Richmnod	TX
Polk County BoCC | Radio Services	Bartow	FL
Putnam County EMS 911	Cookeville	TN
Radio Systems Inc	Logan Township	NJ
Redmond ARES/RACES	Redmond	WA
Richmond Fire Department	Richmond	TX

Agency	City	State
San Joaquin County Office of Emergency Services	Stockton	CA
Stafford Fire Department	Stafford	TX
Texas Tech University	Lubbock	TX
Town of Breckenridge	Breckenridge	CO
Town of Fort Myers Beach	Fort Myers Beach	FL
Town of Westfield Police Department	Westfield	NJ
Township of Clark Office of Emergency Management	Clark	NJ
Union Beach Office of Emergency Management	Union Beach	NJ
VashonBePrepared	Vashon	WA
Village of Carol Stream	Carol Stream	IL
Village of lisle	Lisle	IL
Voice of Vashon	Vashon	WA
Alarmco Message Repeaters	Guilford	CT
West Point City	West Point	UT
Wharton County Junior College	Sugar Land	TX

EXHIBIT B

ENDORSEMENT - INTERNATIONAL ASSOCIATION OF EMERGENCY MANAGERS

International
Association of
Emergency Managers

IAEM Headquarters
201 Park Washington Court
Falls Church, VA
22046-4527 USA
Ph. 703-538-1795
Fax 703-241-5603

August 26, 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 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 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,

Larry J. Gispert

Larry J. Gispert
IAEM President

EXHIBIT C

ENDORSEMENTS – CLEARFIELD CITY, UTAH

Clearfield City

July 29, 2008

Federal Communications Commission
Washington, D.C. 20554

Attention: Chief, Public Communications & Outreach Division, Public Safety & Homeland Security Bureau, & Chief Policy Division

RE: Travelers' Information Stations, Provision of localized Public Safety and Emergency information

Clearfield City is a progressive community with a population of over 29,000 (the business day impact grows to 65,000); located 28 miles north of Salt Lake City, Utah; situated between the Great Salt Lake to the west, and Hill AFB, the state's largest employer, and the Wasatch Mountains (and forests) on the east. With Interstate-15 running the eastern end of the city, freight railroads, and the new Commuter Rail station, Clearfield is emerging as a centralized location of business and public and community development.

Located in Clearfield City, the Freeport Center is a manufacturing, warehousing, and distributing center to the entire West. It is home to 70 national and local companies; and 7,000,000 sq ft. in 78 buildings on 680 acres. Servicing the center and the greater Salt Lake City area, Union pacific freight rail lines run parallel to I-15, within the city and very near residential areas.

I, along with Clearfield City's Emergency Services Manager, Morton Sparks, support the recommendations of the AAIRO (American Association of Information Radio Operators) as stated in the "Petition for Declaratory Ruling" and urge the FCC to consider the importance of access to the TIS for public safety messages impacting the quality of life for the general public who live in or visit our community.

Sincerely,

Chris Hillman
Clearfield City Manager

55 South State Street, Clearfield, Utah 84015 • Phone (801) 525-2710 • Fax (801) 525-2869 • www.clearfieldcity.org

Clearfield City

July 29, 2008

Federal Communications Commission
Washington, D.C. 20554

Attention: Chief, Public Communications & Outreach Division, Public Safety & Homeland Security Bureau, & Chief Policy Division

RE: Travelers' Information Stations, Provision of localized Public Safety and Emergency information

As an elected official for the city of Clearfield, in the state of Utah; I request the FCC to consider the recommendations of AAIRO (the American Association of Information Radio Operators) as stated in the "Petition for Declaratory Ruling".

Clearfield City is a progressive community with a population of over 29,000 (the business day impact grows to 65,000); located 28 miles north of Salt Lake City, Utah; situated between the Great Salt Lake to the west, and Hill AFB, the state's largest employer, and the Wasatch Mountains (and forests) on the east. With Interstate-15 running the eastern end of the city, freight railroads, and the new Commuter Rail station, Clearfield is emerging as a centralized location of business and public and community development.

Located in Clearfield City, the Freeport Center is a manufacturing, warehousing, and distributing center to the entire West. It is home to 70 national and local companies; and 7,000,000 sq ft. in 78 buildings on 680 acres. Servicing the center and the greater Salt Lake City area, Union pacific freight rail lines run parallel to I-15, within the city and very near residential areas.

The TIS is essential to our community and emergency operations procedures are in place for this service to provide citizens an emergency early warning. Our area could be impacted greatly without public access to information concerning road conditions, traffic hazards, travel advisories, the Amber Alert, 911 outage notices, natural disasters, public health warnings, terrorist threat levels, and other civil defense notices.

This is an important issue to Clearfield City's government, city employees, national and local businesses, and the Public Safety and Emergency Services departments. Access to the TIS for public safety messages would positively impact the quality of life for the general public who live in or visit our community.

Sincerely,

Don Wood

Don Wood
Clearfield City Mayor

55 South State Street, Clearfield, Utah 84015 • Phone (801) 525-2710 • Fax (801) 525-2869 • www.clearfieldcity.org

Clearfield City

July 29, 2008

Federal Communications Commission
Washington, D.C. 20554

RE: (TIS) Travelers' Information Stations, Provision of localized Public Safety and Emergency information

Clearfield City, Utah has a population of over 29,000 and the business day impact grows to 65,000 largely due to the Freeport Center; a manufacturing, warehousing, and distributing center to the entire West. Clearfield City is in Davis County and sits between the Great Salt Lake, Hill Air Force Base, the state's largest employer, the Wasatch Mountains (and forests), and Interstate 15 (I-15) running the eastern end of the city. Heavily used Union Pacific freight railroad lines run parallel to I-15 and through Clearfield within the city and very near residential areas. The TIS could be our only public communication to provide information and instructions to the citizens; as access to areas of the city could be greatly compromised in an emergency.

The TIS is essential to our community for public access to information concerning road conditions, traffic hazards, travel advisories, Amber Alert, 911 outage notices, natural disasters, public health warnings, terrorist threat levels, and other civil defense notices. There is a large base of CERT (Community Emergency Response Team) prepared individuals whose training included use of the Travelers' Information Stations. Clearfield City's emergency plan relies on this for public announcements to facilitate medical and rescue operations. As a councilperson for Clearfield City, I support the recommendations of the AAIRO (American Association of Information Radio Operators) as stated in the "Petition for Declaratory Ruling".

Sincerely,

Vern Phipps
Clearfield City Council Member

55 South State Street, Clearfield, Utah 84015 • Phone (801) 525-2710 • Fax (801) 525-2869 • www.clearfieldcity.org

Clearfield City

July 29, 2008

Federal Communications Commission
Washington, D.C. 20554

RE: (TIS) Travelers' Information Stations, Provision of localized Public Safety and Emergency information

Clearfield City, Utah has a population of over 29,000 and the business day impact grows to 65,000 largely due to the Freeport Center; a manufacturing, warehousing, and distributing center to the entire West. Clearfield City is in Davis County and sits between the Great Salt Lake, Hill Air Force Base, the state's largest employer, the Wasatch Mountains (and forests), and Interstate 15 (I-15) running the eastern end of the city. Heavily used Union Pacific freight railroad lines run parallel to I-15 and through Clearfield within the city and very near residential areas. The TIS could be our only public communication to provide information and instructions to the citizens; as access to areas of the city could be greatly compromised in an emergency.

The TIS is essential to our community for public access to information concerning road conditions, traffic hazards, travel advisories, Amber Alert, 911 outage notices, natural disasters, public health warnings, terrorist threat levels, and other civil defense notices. There is a large base of CERT (Community Emergency Response Team) prepared individuals whose training included use of the Travelers' Information Stations. Clearfield City's emergency plan relies on this for public announcements to facilitate medical and rescue operations. As a councilperson for Clearfield City, I support the recommendations of the AAIRO (American Association of Information Radio Operators) as stated in the "Petition for Declaratory Ruling".

Sincerely,

Doyle Sprague
Clearfield City Council Member

55 South State Street, Clearfield, Utah 84015 • Phone (801) 525-2710 • Fax (801) 525-2869 • www.clearfieldcity.org

Clearfield City

July 29, 2008

Federal Communications Commission
Washington, D.C. 20554

RE: (TIS) Travelers' Information Stations, Provision of localized Public Safety and Emergency information

Clearfield City, Utah has a population of over 29,000 and the business day impact grows to 65,000 largely due to the Freeport Center; a manufacturing, warehousing, and distributing center to the entire West. Clearfield City is in Davis County and sits between the Great Salt Lake, Hill Air Force Base, the state's largest employer, the Wasatch Mountains (and forests), and Interstate 15 (I-15) running the eastern end of the city. Heavily used Union Pacific freight railroad lines run parallel to I-15 and through Clearfield within the city and very near residential areas. The TIS could be our only public communication to provide information and instructions to the citizens; as access to areas of the city could be greatly compromised in an emergency.

The TIS is essential to our community for public access to information concerning road conditions, traffic hazards, travel advisories, Amber Alert, 911 outage notices, natural disasters, public health warnings, terrorist threat levels, and other civil defense notices. There is a large base of CERT (Community Emergency Response Team) prepared individuals whose training included use of the Travelers' Information Stations. Clearfield City's emergency plan relies on this for public announcements to facilitate medical and rescue operations. As a councilperson for Clearfield City, I support the recommendations of the AAIRO (American Association of Information Radio Operators) as stated in the "Petition for Declaratory Ruling".

Sincerely,

Mark Shepherd
Clearfield City Council Member

55 South State Street, Clearfield, Utah 84015 • Phone (801) 525-2710 • Fax (801) 525-2869 • www.clearfieldcity.org