

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

In the Matter of )  
 ) RM-11514  
TRAVELERS INFORMATION SERVICE ) PS Docket 09-19  
 )

**COMMENTS OF APCO**

The Association of Public-Safety Communications Officials-International, Inc. (“APCO”) hereby submits the following comments in response to the Commission’s *Public Notice*, 09-249 (released February 13, 2009), regarding a petition for ruling submitted by the American Association of Information Radio Operators (“AAIRO”) and a petition for rulemaking submitted by Highway Information Systems, Inc. (“HIS”). Both petitions address the type of information that may be broadcast on Travelers Information Service (“TIS”) stations.

Founded in 1935, APCO is the nation’s oldest and largest public safety communications organization. Most APCO members are state or local government employees who manage and operate communications systems for police, fire, emergency medical, forestry conservation, highway maintenance, disaster relief, and other public safety agencies. APCO is the largest FCC-certified frequency coordinator for Part 90, Public Safety Pool channels, and appears regularly before the Commission on a wide variety of public safety communications issues.

AAIRO asks the Commission to clarify that under Section 90.242(a)(7), “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, at the sole discretion of officials authorized to operate such stations.” APCO supports such a clarification.

Unfortunately, the FCC's rules regarding TIS have sometimes been construed to prohibit broadcast of information such as NOAA weather reports that would clearly promote public safety. That has discouraged some local governments from utilizing TIS to its full potential. There is wide range of public safety-related information that should be permitted for broadcast on TIS stations, such as weather reports, Amber Alerts, public health messages and other civil defense notices. APCO urges the Commission to take appropriate steps to eliminate any ambiguity in its rules that might prevent such public safety information from being disseminated to the public on TIS stations.

APCO takes no position at this time on the HIS petition for rulemaking. However, any further Commission consideration of the HIS petition should carefully consider the possible consequences of HIS's recommendation that local governments be allowed to use TIS for any noncommercial purpose, not just for public safety information.<sup>1</sup>

Respectfully submitted,

/s/

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March 16, 2009

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<sup>1</sup> HIS also recommends the TIS be renamed "Local Government Radio Service." That had previously been the name of a Part 90, land mobile radio service now part of the Public Safety Pool. Thus, if there is a name change in the direction HIS recommends, APCO suggests "Local Government AM Radio Service" as an alternative to avoid confusion.