



Island Community Radio

March 7, 2011

Federal Communications Commission
Washington, D.C. 20554

RE: Docket 09-19 Travelers' Information Service/AAIRO's "Petition for Ruling"

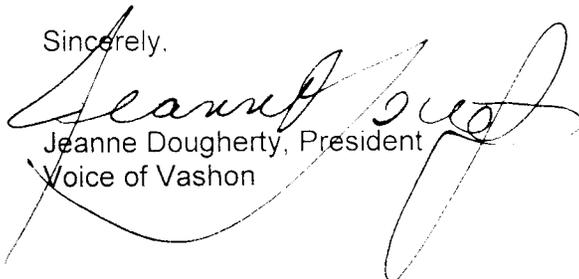
As a licensed Travelers Information Radio Station operator, I fully and emphatically support AAIRO's position regarding clarification and update of FCC Part 90.242 rules governing the Travelers Information Service.

Vashon Island is a rural community in King County, Washington accessible to the mainland by ferry only. We purchased our TIS system, along with stationery remotely activated flashing lights, to provide important safety information to our island community during times of emergency. It is critical that we be able to carry out this function, when we feel it is necessary to do so, regardless of the exact nature of the safety message that we choose to broadcast. We should not be limited to the narrow definition currently found in the TIS regulations. As such, we support AAIRO's recommendation to loosen, but not lift, content restrictions of these systems.

Vashon Island is built on complex topography. As such, the current restrictions on "ribboning" or networking of systems do not allow us to easily reach portions of our populations. This difficulty is easily remedied with a network of transmitters. We support the recommendations of AAIRO to clearly allow "ribboning" or networking of TIS stations without the burdensome and restrictive "proof" of need on the part of the license holder.

All disasters are local, and it is imperative that local operators have the expressed authority to broadcast, at their discretion, public safety information for the protection of life and property. The travelling public is a broad descriptor that at any given moment can represent a significant percentage of the total local population. The common thread for those falling under the description of travelling public is that they are all potentially victims of the same locally hazardous situation and they all deserve access to information that can facilitate their safe passage.

Sincerely,



Jeanne Dougherty, President
Voice of Vashon