These reply comments are submitted by AAIRO – The American Association of Information Radio Operators - and relate to the Notice of Proposed Rulemaking regarding Travelers Information Stations (Docket 09-19). This filing is being made in this rulemaking proceeding after the March 7 reply deadline because of the March 11 earthquake in Japan which has affected the United States, and which provides valuable illustration of how the rebroadcast of NOAA Weather Radio content on Travelers Information Stations - both emergency/hazard messages, as well as routine/non-emergency preparedness messages - can protect the lives and property of travelers.

The Washington State Parks and Recreation Commission and the Oregon State Marine Board together operate twelve Travelers Information Stations, each one located at Coast Guard facilities which are situated along the Oregon and Washington coasts. The Coast Guard provides broadcast content for the TIS stations and also operates notification signs located on roadways in the vicinity. Each sign contains radio-controlled flashing beacons to tell motorists to tune in when broadcast messages are urgent. The Coast Guard facilities and their associated TIS stations are located at harbors/river mouths along the shoreline, which also are the locations most susceptible to property damage and loss of life due to a tsunami. Along the California shore, there are numerous cities which have TIS stations, each well positioned to warn citizens of an approaching tsunami. (A listing of these TIS stations is below.)

Had the above-mentioned TIS stations included NOAA Weather Receivers with S.A.M.E. relays keyed to the tsunami warning code, the NOAA tsunami warnings would have been rebroadcast to motorists on 1610 kHz AM instantly and automatically when the warnings were issued.

Had FCC rules allowed for non-emergency/preparedness messages to be broadcast well in advance of dangerous tsunami conditions, travelers could have been prepared as to what actions to take in advance of the event (eg: locations to evacuate to/areas of safety, roadways and other areas that are likely to be unsafe or closed, etc.).

The southern-most TIS station listed (below) in Oregon is at the Chetco River Coast Guard facility, which is in the harbor at the city of Brookings, OR. This location sustained significant tsunami damage on Friday, March 11th, 2011: two people and dozens of boats were swept out to sea; millions of dollars in property were lost or destroyed including 60-80% of Brookings' commercial docking facilities.

By virtue of the Specific Area Message Encoding (S.A.M.E.) function of modern NOAA Weather Receivers, TIS stations can be automatically triggered to rebroadcast NOAA-transmitted locally-relevant warning messages concerning virtually any hazard - tsunami or otherwise - instantly and without the delay.* The TIS broadcast can be programmed to revert to standard programming after

the warning has expired. This S.A.M.E function can be set up selectively, to allow the TIS station to broadcast all issued warnings for a given location or only specific classes of issued warnings, as required. A coastal TIS station can be keyed to trigger NOAA rebroadcast on issuance of a tsunami warning, while a TIS station located in conjunction with a nuclear plant could be triggered specifically to rebroadcast a NOAA-transmitted nuclear incident warning. For example, the Hanford Site in the State of Washington, operates the Columbia (Nuclear) Generating Station. In conjunction, the Hanford Site operates a pair of TIS Stations which could transmit the NOAA Hazard Warnings to travelers ("Radiological Hazard Warning" or "Nuclear Power Plant Warning") instantly when issued. The TIS stations need only be fitted with NOAA-S.A.M.E alerting equipment.

The NOAA Weather Radio Service also provides helpful non-emergency advisory information prior to and during times of crisis, which can aid motorists in avoiding a weather catastrophe and/or minimizing its severity.* For example, NOAA frequently broadcasts helpful preparedness information for travelers which can mitigate the effects of a future disaster: what motorists should do when a storm is approaching; what to do when encountering flooding in an automobile; what items to keep in ones car in case one becomes stranded in a snowstorm. And, in the larger sense, all weather forecasting is preventative in that it allows the traveler to most efficiently plan his route and avoid unforeseen hazards. Even during the emergency, such "routine" NOAA weather information may

prove critical. An example would be NOAA's predictions of wind direction and speed, as motorists attempt to avoid or flee from fallout, radiation, noxious chemical leakages, smoke and fumes that could result from a nuclear, industrial or Hazardous Materials incident.

Because of the limited transmitting range of TIS stations and the relevance of often identical broadcast messages related to a wide scale emergency such as an approaching tsunami, nuclear incident or similar hazard, the TIS ribboning technology would be helpful in that it would allow important messages to be disseminated more widely, with the goal of preserving travelers' lives and property.

(*) TIS station operators desire to have the express authority to broadcast locally-generated routine/preparedness and emergency messages, as well as those provided through the facilities of NOAA Weather Radio. The NOAA-S.A.M.E. All Hazard service adds value because it provides the additional capability for an automatic interruption of regular TIS programming in order to instantly air warnings. This, in some cases, would benefit travelers by allowing the information to be broadcast earlier than would otherwise be the case.

Respectfully submitted by AAIRO

– The American Association of Information Radio Operators

TIS STATION LOCATIONS ALONG THE US WEST COAST WHICH COULD DELIVER TSUNAMI WARNING INFORMATION

In Washington (all 1610 kHz)

La Push River (WQEL572)
Grays Harbor (WQEL572)
Columbia River (WQEL572)

In Oregon (all 1610 kHz)

Tillamook River (WQEL382)
Depoe Bay (WQEL382)
Yaquina Bay (WQEL382)
Siuslaw River (WQFH234)
Umpqua River (WQEL382)
Coos Bay (WQEL382)
Coquille River (WQFH234)
Rogue River (WQFH234)
Chetco River (Brookings) (WQEL382)

In California (various frequencies and callsigns)
Cities of:

Pescadero
Monterey
Pebble Beach
Carmel Highlands
Morro Bay
Pismo Beach
Montecito
Buenaventura
Malibu
Redondo Beach
Long Beach
Newport Beach
Encinitas

There is a TIS station at the University of California, San Diego, which includes Scripps Institution of Oceanography, which is located on the Pacific shoreline.

There are numerous coastal TIS station locations operated by Caltrans – California's Department of Transportation.