

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 FURTHER NOTICE OF PROPOSED RULEMAKING 13-98

I Operation a TIS Transmitter without the audio filter should be optional, not mandatory. TIS transmitters modified to remove the filters should not require recertification.

AAIRO¹ members, as a whole, strongly support the elimination of transmitter audio filters, because they negatively impact intelligibility. However, as a practical matter, there is reason for concern. If, in the future, the FCC mandates that existing licensees may continue only with unfiltered transmitters, many smaller governmental entities would be forced to cease operation due to lack of funds for

¹ Formed in 2008, the American Association of Information Radio Operators (AAIRO) is a nonprofit organization of operators & licensees from public agencies who manage Information Radio Stations across the country to inform and protect motorists.

modifications. In a time when most agencies are looking for ways to cut costs, this requirement races in the other direction. We, therefore, urge the FCC not to require filter removal for existing licensees.

Further, if, the FCC were to mandate that all TIS licensees who wish to remove the filters must go through a new type acceptance/recertification, that requirement would present an undue financial burden, in effect preventing most from being able to make the improvement. The imposition of both the above requirements would likely cause most TIS Services to cease due to expense and logistics.

For those reasons, AAIRO asks that the FCC consider making transmitter filter removal optional for current licensees – not mandatory. This would allow operators who can afford to modify their transmitters to do so without negatively impacting those who cannot. To encourage operators to improve the TIS Service in this way, AAIRO asks the FCC to allow filtering circuitry to be removed without requiring that modified transmitters be individually recertified. We propose this in light of the fact that co-channel and first-adjacent separation standards under TIS Rules Section 90.242 are already more rigorous than for conventional broadcast stations; and voice audio, when broadcast on an unfiltered TIS station, already falls well within the NRSC mask.

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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August 29, 2013

