

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

**In the Matter of**

<b>Travelers' Information Stations;</b>	)	<b>PS Docket 09-19</b>
	)	
	)	
	)	
<b>American Association of Information Radio Operators Petition for Ruling on Travelers' Information Station Rules;</b>	)	
	)	
	)	
<b>Highway Information Systems, Inc. Petition for Rulemaking;</b>	)	<b>RM-11514</b>
	)	
	)	
<b>American Association of State Highway and Transportation Officials Petition for Rulemaking</b>	)	<b>RM-11531</b>

**To: The Commission**

**COMMENTS OF THE AMERICAN ASSOCIATION OF STATE HIGHWAY  
AND TRANSPORTATION OFFICIALS**

The American Association of State Highway and Transportation Officials (AASHTO) is the trade organization representing the Administration, Bureau or Department in each of the fifty states, the District of Columbia and the Commonwealth of Puerto Rico responsible for the construction, operation and maintenance of our nation's transportation system. AASHTO members operate and maintain essential services for the transportation of goods, services and passengers across all five modes – surface, water, air, rail and public. AASHTO members have installed and operate many different types of systems to inform the traveling public of road and travel conditions ranging from dynamic message signs to traveler information stations operating on both AM and FM frequencies.

AASHTO recognizes the Commission established the Traveler Information Radio Service in 1977 as a means for authorized users to provide timely and sometimes urgent information regarding road conditions, weather alerts and essential service information to travelers on a localized basis. However, since these rules were adopted the listening habits of the American traveler have changed significantly. Over the past few years AM radio stations operating between 535 and 1705 kilohertz have largely abandoned the formats of news, music and traffic reports for largely political talk and religious formats. For a great many Americans, AM radio is no longer seen as a source for news and information to the average listener as they have abandoned AM for FM stations, satellite, Internet and personal music players with their clearer reception, better fidelity and more relevant formats.

In many areas of the country, TIS stations cannot be installed because of their secondary status even when operating on their primary channel of 530 kilohertz because adjacent AM stations operating at 535 kilohertz. The Commission does not take into consideration any protection for traveler information stations already operating on this frequency when assigning the adjacent

channel to an AM station operating with several thousand watts of radiated signal. In fact, the incumbent TIS station must abandon its authorized channel to protect the newly authorized station. It is for this reason several states are beginning to license low power FM channels as they do receive protected spectrum and greater coverage as well as greater bandwidth so their critical information is clear.

AASHTO agrees with the American Association of Information Radio Operators that the bandwidth filter provision should be removed from Section 90.242 of the Commission's Rules and Regulations and that the removal of audio filters in existing stations be optional.