

Before the
Federal Communications Commission
Washington, D. C.

In the Matter of)
)
Proposal to Relax the Audio Filtering) PS Docket 09-19
Requirements for Travelers' Information)
Stations)

Comments of
Hatfield & Dawson Consulting Engineers, LLC

The consulting engineering firm of Hatfield & Dawson submits these comments in response to the April 16, 2014 Request for Comments, in which the Commission solicited comment on the matter of "relaxation" rather than elimination of Section 90.242(b)(8) of the Commission's Rules.

Hatfield & Dawson filed comments during the original comment period of this rulemaking, but they were somehow eliminated from the Commission's computer system despite evidently being successfully uploaded. In those comments, we supported elimination of the rule.

In the currently pending MB Docket 13-249 we proposed limiting the bandwidth of all MF broadcasting stations to a specific value because of the known limited bandwidth of virtually all modern MF receivers.¹ Therefore we now support a similar limitation for non-broadcast stations in the MF band, ie, TIS operations.

Respectfully Submitted, April 30, 2014

Hatfield & Dawson Consulting Engineers, LLC



Benj. F. Dawson III, P.E

¹ "Eliminate the NRSC response curve, and change the bandwidth mask for AM stations, specifying rolloff at 5 or 6 kHz to match NRSC documented receiver performance" was our recommendation in that matter. See also NPR Labs report "Consumer Testing of AM Broadcast Transmission Bandwidths and Audio Performance Measurements of Broadcast AM Receivers" 9/8/2006 and the consequent "NRSC R101" 12/2006.