

**Before the
Federal Communications Commission
Washington, D.C. 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 Services, Inc. Petition for Rulemaking;)	RM-11514
)	
American Association of State Highway and Transportation Officials Petition for Rulemaking)	RM-11531

**REPLY COMMENTS OF THE
NATIONAL ASSOCIATION OF BROADCASTERS**

The National Association of Broadcasters (“NAB”)¹ respectfully submits these brief reply comments on the above-captioned Notice of Proposed Rulemaking (“Notice”).² NAB notes the broad support in the record for a narrow expansion of the rules governing Travelers Information Stations (“TIS”)³ to allow TIS operations to provide certain additional information that will enhance the situational awareness of

¹ NAB is a nonprofit trade association that advocates on behalf of local radio and television stations and also broadcast networks before Congress, the Federal Communications Commission and other federal agencies, and the courts.

² Travelers Information Stations; American Association of Information Radio Operators Petition for Ruling on Travelers’ Information Station Rules; Highway Information Services, Inc. (n/k/a by name of new owner “Vaisala”) Petition for Rulemaking; RM-11514; American Association of State Highway and Transportation Officials Petition for Rulemaking; RM-11531, *Notice of Proposed Rulemaking*, PS Docket No. 09-19 (*rel. Dec. 30, 2010*) (“Notice”).

³ 47 C.F.R. § 90.242.

travelers (e.g., AMBER Alerts, 511 information, NOAA Radio “All Hazard” alerts).⁴

Expanding the TIS rules in this manner will provide critical additional information that will enhance travelers’ situational awareness during emergencies.⁵ The issuance of these types of emergency alerts is also subject to federal guidelines, thereby ensuring that travelers receive clear, consistent messages and information. NAB, however, continues to oppose proposals that would allow TIS operations to carry routine information not related to travelers or emergencies.⁶ Such a radical change would alter the fundamental nature of TIS operations and dilute the unique value of TIS service as a source for emergency and other travel-related information.

Importantly, NAB observes that those arguing for significant changes to the TIS service have not demonstrated that such broader changes are necessary to serve the public interest. The Commission specifically asked for comment on whether the public

⁴ See, e.g., Reply Comments of the Association of Public-Safety Communications Officials-International, Inc. (“APCO”), PS Docket No. 09-19 (filed Feb. 24, 2011) at 1-2; Comments of the American Association of State Highway and Transportation Officials (“AASHTO”), PS Docket No. 09-19 (filed Feb. 18, 2011) at 2; Comments of Daniel R. Gropper, PS Docket No. 09-19 (filed Feb. 18, 2011) at 2; Comments of National Public Radio, Inc. (“NPR”), PS Docket No. 09-19 (filed Feb. 18, 2011), at 2-3; Comments of the Maryland Highway Administrations (“MD SHA”), PS Docket No. 09-19 (filed Feb. 18, 2011), at 2-8. The Metropolitan Transportation Commission, operator of the San Francisco Bay Area’s 511 system, expresses concerns that allowing TIS operations to carry 511 information could create duplication of traveler information that might confuse travelers. Comments of the Metropolitan Transportation Commission (“SF MTS”), PS Docket No. 09-19 (filed Feb. 18, 2011) at 2. To address these concerns, the Commission could consider SF MTS’ proposal to allow TIS operations to carry information about the availability of 511 services, but not the same underlying information provided by the 511 service.

⁵ See, e.g., Comments of the National Association of Broadcasters, PS Docket No. 09-19 (filed Feb. 18, 2011) at 2-4; AASHTO Comment at 3-5.

⁶ Comments of Vaisala, PS Docket No. 09-19 (filed Feb. 18, 2011) at 2-4 (new owner of Highway Information Services, Inc. contending that TIS service should be transformed into a more generalized radio service for local governments); Comments of the American Association of Information Radio Operators (“AAIRO”), PS Docket No. 09-19 (filed Feb. 18, 2011) at 4-8 (urging expansion of TIS rules to allow NOAA weather radio and other routine, non-emergency related information).

interest would be served by expanding the scope of the TIS rules, as proposed by Vaisala. Notice at ¶ 27. However, neither the proponent of this change nor any other party offered new evidence to support this proposal. Vaisala merely repeats earlier assertions that its TIS customers believe the current rules are too restrictive. Vaisala Comments at 2.

For the foregoing reasons, NAB reiterates its support for a targeted expansion of the TIS rules. We believe that the record does not support a broader expansion, let alone a complete transformation of the TIS service.

Respectfully submitted,

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