

March 3, 2011

Federal Communications Commission  
Washington, DC 20554

RE: Docket 09-19 Travelers' Information Service/AAIRO's "Petition for Ruling"

Auburn, Washington is a city of more than 68,000 people, located in south King and north Pierce Counties, approximately 20 miles south of Seattle. Our 29.83 square miles contain three state highways and 211 miles of city maintained streets, as well as an elevation change of more than 600 feet. One of those highways serves as a connection between Interstate 90 and Interstate 5, for those who want more direct routing or to avoid the metro area. We are home to a college, a large mall, two significant federal facilities, a horse track and numerous large companies and regional distribution centers that both rely upon and produce items shipped in and out of the city by truck. Just a mile outside our city limits sits a motor sports track, which is host to national level professional motor sport events. All of this leads to our having a large transient daytime population who may be largely unfamiliar with our city, and to a large commuter population that traverses our roads as part of their daily commute.

We purchased our TIS system, along with stationary remotely activated flashing lights and mobile variable message signs, to provide important life safety information to our highly mobile population during times of emergency. It is critical that we be able to carry out this function, when we feel it is necessary to do so, regardless of the exact nature of the life safety message that we choose to broadcast. We should not be limited to the narrow definition currently found in the TIS regulations. As such, we support AAIRO's recommendation to loosen, but not lift, content restrictions on these systems.

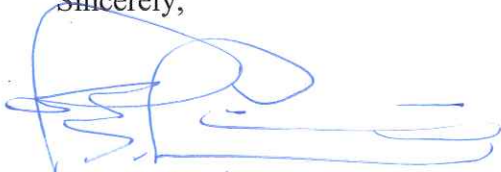
As noted in the first paragraph, the city of Auburn is built on complex topography. As such, the current restrictions on "ribboning" or networking of systems do not allow us to easily reach large portions of our population. Our complex terrain decreases the efficacy of our station, rendering it useless in parts of the city. This could be easily remedied with a network of transmitters, but current rules require that we demonstrate need, which is both burdensome and restrictive. We support the recommendation of AAIRO to clearly allow "ribboning" or networking of TIS stations without requiring proof of need on the part of the license holder.

The current requirement to filter our TIS signal also renders it useless in areas that would otherwise be easily served by the station. As recently as this week, when we utilized the system to broadcast hazardous road conditions caused by a snowstorm, we received numerous phone calls and e-mail messages from both staff and area motorists, reporting that though they could tell there was "something" being broadcast on the station, they were unable to determine what it was. We strongly support AAIRO's recommendation that the filtering requirement be eliminated.

In light of our use of our station to assist motorists in the recent snowstorm, it is obvious that these stations can be used to help motorists through the broadcast of weather conditions and forecasts and all weather-related travel information. Though this was anticipated in the TIS service's initial Report and Order, it was not made clear in the current rules. The best and most timely source of this, as well as all-hazard emergency information is the NOAA Weather Radio service, provided by our federal government's Department of Commerce. Please make it clear that excerpts of this information, which is clearly timely and valuable to motorists, may be broadcast.

We support the recommendations made by AAIRO regarding the Travelers' Information Service and urge the Federal Communications Commission to act upon them quickly and favorably, so that we may provide the safest possible environment for our area motorists.

Sincerely,

A handwritten signature in blue ink, appearing to read "Peter B. Lewis". The signature is stylized with a large, sweeping initial "P" and "L".

Peter B. Lewis  
Mayor