

OKLAHOMA DEPARTMENT OF TRANSPORTATION
200 N.E. 21st Street
Oklahoma City, OK 73105-3204

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of)	
)	
Creation of a Low Power)	MM Docket No. 99-25
Radio Service)	FCC 99-6

COMMENTS OF THE
OKLAHOMA DEPARTMENT OF TRANSPORTATION

By
Mike Woods, Communications Branch

May 28, 1999

Introduction

The Oklahoma Department of Transportation currently owns two Traveler Information Stations (TIS, under FCC Rules, Part 90.242), these units have been used statewide to disseminate information regarding alternate routes during construction projects and special events. They were utilized in Oklahoma City during the aftermath of the Alfred P. Murrah building bombing to provide entrance and exit ramp status in the downtown area. The deployment of these units has improved our ability to disseminate information to the public traveling through these areas.

Comments and Discussion

We would like to register our support for your proposal (FCC 99-6) to bring new licensing structure and frequency uses for the FM broadcast band (88-108 MHz). In particular, our support is for the 100 watt and _micropower_ (up to 10 watt) licensing for the use of activities similar to the TIS use on the 530-1700 kHz AM broadcast band. We believe this use of the new low power radio service you propose will offer superior and more dependable communication between the travel corridor user and the provider that will serve in addition to those offered by the currently available channels on the AM broadcast band.

In our support for this proposed set of rules changes, we do not support micropower service without licensing. This could create enforcement problems and increase the difficulty in resolving

interference complaints thus compromising the integrity of this program. We support your continued reservation on the 88-92 MHz portion of the band that force educational or noncommercial use of these channels. However, we support the low power channel use for TIS purposes anywhere in the entire 88-108 MHz band. [Reference paragraphs 6 and 7 of your summary in the Federal Register, Vol. 64, No. 30]

We agree with your proposal that these stations not be subject to certain technical rules currently applied to other classes of radio service in regard to third and second adjacent channel interference. [Reference paragraph 1 of your summary]

We agree and support your proposal not to authorize similar low power stations in the AM broadcast band. We agree that to do so would increase the already high interference potential and congestion in that frequency band. [Reference paragraph 5 of your summary]

We would like to comment on our wish to pursue TIS operation as a government entity, serving under the current restrictions of your rules, Part 90.243, in this new service, and, therefore, would like to comment positively on such operation. [Reference paragraph 7 of your summary]

We would like to comment on your technical proposals concerning LP100 stations selecting their frequencies. We recommend the prospective licensees be required to do a study before choosing a channel, and are required to follow your recommendations that 10 percent or less of their 60 dBu would be predicted to receive interference. [Reference paragraph 16 of your summary]

We comment positively on prohibition of translating or boosting of LP100 station signals, EXCEPT

WHERE THEY ARE USED IN AN AREA-WIDE TIS SERVICE BY GOVERNMENT ENTITIES.

A large number of channels could be consumed in a large urban area for TIS operations without allowing simultaneous, phase-locked transmissions for reporting road conditions, closings and other safety related broadcasts. [Reference paragraph 17 of your summary]

We recommend adopting the micropower radio class of station. We recommend protection of the TIS operation stations in this classification, whether or not you require protection of other stations. [Reference paragraph 20 of your summary]

We recommend modulation monitors be optional on the LPFM stations and the transmitters be certified with built-in modulation limits to avoid interference to other stations.

We request for the TIS station use by government entities mentioned above, the removal of prohibition again an entity owning more than one station in the same community. [Reference paragraph 32 of your summary]

We recommend the micropower station licensees be exempted from the main studio file rule, the public file rule and the periodic ownership reporting requirements. [Reference paragraph 43 of your summary]

We recommend you treat LPFM stations like full power stations where protection against exposure to radio frequency radiation is concerned. This should also extend to micropower stations. The simple calculations concerned, coupled with simpler antennas should allow standard calculations to be performed and warning signs posted if required. [Reference paragraph 44 of your summary]

We agree with your proposed construction permit periods mentioned in paragraph 46 of your summary.

We request renewal ability be granted TIS governmental entity station operators in the LP100 and micropower classes of LPFM station. The inherent service to the public of such stations warrants their renewal to serve the community at large. [Reference paragraph 48 of your summary]

We recommend micropower and LP100 stations be relieved of any requirement to participate in the Emergency Alert System operations. We agree with your comments that these stations will not have the coverage area, audience or finances to comply with this operation. Also, they will likely not be the station serving the whole community of listeners, thus may be excused by other, more powerful stations taking on the role of emergency alerting in the community. [Reference paragraph 49 of your summary]

We recommend assigning LPFM stations call sign that identify them as being LPFM class transmitters. We feel knowing the station call sign will always help identify malfunctioning or interfering stations, thus easing FCC efforts in controlling spurious transmitter behavior. [Reference paragraph 50 of your summary]

We feel that LPFM stations should be made available for inspection, similar to the requirements for full-power stations. We also feel it is reasonable for the Commission to require stations in LPFM class operation to immediately cease operations if these stations cause interference and the operator is notified of the problem.

We agree that, due to the likely number of applicants, the Commission allow and require electronic filing of LPFM station license applications. We comment that whatever your system of applications, the first flood of applicants could overload the application system when the LPFM licensing doors are opened. We consider that for applicants like ourselves, who have a whole state to serve, that a very short filing window would be a hardship and handicap to achieving our operations goals for TIS applications. [Reference paragraph 55 of your summary]

We recommend that the Commission license these devices without auction under the legislative intent. We believe auctioning these low-cost, local, noncommercial station licenses would be contrary to your intent in creating the service.

Conclusion

The State of Oklahoma Department of Transportation supports the LPFM licensing of LP100 and micropower stations, especially when used by government entities as TIS transmitters. We support interconnected TIS operations in areas with freeways and turnpikes to facilitate communications to the traveling public over the served areas, notifying the public of road construction and repair as well as some weather-related topics.