

**MATTER BEFORE THE**  
**FEDERAL COMMUNICATIONS COMMISSION**  
**The Portals, 445 Twelfth St., S.W., Rm. TW-A325**  
**Washington, D.C. 20554 USA**

**MM Docket No. 99-25**  
**FCC 99-6**

**Regarding NPRM FCC 99-25 - Seeking comments on the proposal to authorize new, low power FM (LPFM) radio stations.**

**Comments of the International Bridge, Tunnel and Turnpike Association**

**The International Bridge, Tunnel and Turnpike Association (IBTTA) hereby submits comments in favor of creating new, low power FM radio services, to enable the creation of low-power FM radio Highway Advisory Radio systems.**

**Background**

**IBTTA is the not-for-profit trade association representing the worldwide toll industry. Our United States membership includes more than 50 toll authorities operating some 135 toll roads, bridges and tunnels. These facilities encompass almost 5,000 miles of roadway, and carry over 3.35 billion vehicles each year.**

**Toll financing is an effective mechanism to finance the design, construction, operation and maintenance of road capacity.**

**Toll authorities are notable among transportation providers in that they must be very concerned about the level of service they provide their customers in return for the toll paid. In most cases, for each toll facility there is alternate, non-toll route that travelers could use instead if they feel the benefit provided by the toll road doesn't merit the payment.**

**As a result, toll authorities continually look for ways to enhance the services they provide, including the application of electronic toll collection (ETC), or Travelers Information Services (TIS) to provide drivers with traffic guidance and information.**

**The ability to communicate with highway travelers is critical to the safe and efficient movement of traffic, providing notice of planned activities that may affect traffic conditions (construction, holidays, special events) as well as accident notification and suggestions for alternate routing. This is especially significant in case of emergency services.**

**Many toll agencies operate Highway Advisory Radio (HAR) systems as currently allowed on the AM radio band. Under current FCC regulations, HAR operates in the AM radio spectrum at low power levels.**

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**Because of the inherent limitations of AM radio, coupled with low power, HAR services are known for their low broadcast quality, making the service less useful to the driving public, and thereby less useful to the agency taking the time and effort to issue the broadcasts. Paragraph 17 of the NPRM notes many difficulties associated with adding new services in the AM band, and these difficulties hold true for existing users in the AM band as well.**

**Our toll agency members represent a variety of transportation facilities; urban roads, bridges and tunnels, some with relatively short system lengths, and facilities that stretch for hundreds of miles, through both urban and rural environments.**

### **Conclusions and Recommendations**

**The potential creation of a reliable radio service, less prone to the failings of AM radio based systems, is an important tool for toll agencies and others in meeting their objectives.**

**IBTTA urges the Commission to reserve a portion of the low power band for these applications so that drivers can effectively receive traffic information within a certain frequency range.**

**Realizing that some of the more extensive toll facilities might need access to several stations within a state or region to serve their facility adequately. We therefore urge that the FCC not limit the number of stations available to serve such an application.**

We appreciate the Commission's efforts to make low power FM services available and are hopeful the suggested use of LPFM for Highway Advisory Radio and Traveler Information Services finds merit in your deliberations.

We look forward to the Commission's decisions in these matters, and would be pleased to provide any further information that would be helpful to the commission's decision-making.

Respectfully submitted,

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