

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

In the Matters of:	)	
	)	
Amendment of Part 11 of the Commission's Rules	)	PS Docket No. 15-94
Regarding the Emergency Alert System	)	
	)	
EAS Handbook	)	

**Comments of David L Turnmire**

July 5, 2016

By way of introduction, I have been a television broadcast engineer since 1980, have served as the chair of the East Idaho Local Emergency Communications Committee (LECC) and as member of the Idaho State Emergency Communications Committee (SECC) since 2003, and as the chair of the Idaho SECC since 2011. The comments expressed herein are my own.

I commend the hard work put into the proposed handbook by the CSRIC and believe that is a needed improvement over the 'current' EAS Handbook. And I appreciate the Federal Communications Commission giving it the serious consideration it deserves.

I do, however, have one area of concern. That regards the statement on page A-10 of the proposed handbook "RWT tests received from outside our facility are never relayed."

I am unaware of anything in the FCC rules that indicate that "never relayed" part. I will agree the generally intended purpose is that they aren't relayed and some of our testing policy in Idaho assumes that "general" purpose. Still... as is widely known in the EAS community... and as the CSRIC acknowledges on page C-5 and D5... some broadcasters do in fact configure their boxes to relay RWTs. Sometimes that is more-or-less an accident... and sometimes a considered choice.

Should this practice be prohibited? The CSRIC repeatedly asks that this point be addressed by the FCC (A-0, B-0, C-0, C-5, D-0, and D-5). I agree that this should be addressed. I can see essentially two reasons for requiring RWTs to be ORIGINATED by an EAS Participant. One is to test the ability of their equipment to do so, and the second being to test the ability of the operator to do so. [In the specific case of LPs, you might add that their transmitted RWT also tests the ability of downstream broadcasters to receive it].

I would argue that forwarding any alert... including an RWT... accomplishes the purpose of verifying the equipment can issue a proper alert (assuming you pay attention to the result!). And I would argue that the second purpose is largely pointless for multiple

reasons. As has often been noted, many of today's stations are unmanned for most or all of the day. The State/Local Plans often don't include stations as originators, reflecting a policy decision that emergency management is more qualified to do so. And pushing a single button to issue an RWT is a longggggg way away from the skill set to originate an actual alert and thus proves little of practical value regarding operator skill.

In short, I see little practical reason for the FCC to favor locally triggered RWT origination as opposed to merely forwarding an incoming RWT. I can, however, see reasons why a station shouldn't CHOOSE to do so. The principal reason being that you will interrupt your programming much more frequently. In my community, you'll receive an RWT from the two LPs... but you'll also receive one from our NOAA weather station, which we encourage (but don't mandate) broadcasters to monitor. And each week there is a minimum of three RWTs received from IPAWS (essentially, FEMA, state, and local emergency management). So you have now interrupted your programming six times rather than the legally required once.

But... I would argue that should be the choice of the station involved. There is an exception... and that would involve stations that serve the role of Local Primary (or State Primary for the states that have them). In that case, their actions regarding EAS matters necessarily affect not just their audience, but those of other EAS Participants. While I would prefer that such issues be dealt with via SECCs and/or LECCs, I wouldn't have a significant disagreement with the FCC restricting the choices of LPs regarding forwarding of RWTs. It should, however, remain a free choice for the Participating National (PN) stations.