

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

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

**Comments of Sage Alerting Systems, Inc.  
Blue Alerts NPRM**

July 27, 2017

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**1 Introduction**

Sage Alerting Systems herein provides comments on the Commission's proposal to add a BLU event code. Sage will not address the desirability or utility of the new code, but will focus on implementation details, should the commission decide the new code is needed.

**2 Sage allows for new events to be added in the field**

Regarding the timeline question in NPRM paragraph 17, Sage has always allowed for the addition of new event and location codes by end users in the field. All Sage ENDEC users have the ability to add the contemplated Blue Alert event code, and then use that code in filters that would select it for airing.

In 2016, we were able to add the three severe weather-related EAS event codes to the software update that was required to implement the 2016 National Periodic Test/All US location code changes. Because every Sage user needed to download that software to support the NPT, they did not need to make use of the user-updatable new event code facility.

Sage may, or may not, release a software update into which we could add a new event code in the next few months, but users will be able to install the new event code using the existing new event code facility offered in our settings file. This results in no lead time for Sage for this particular new requirement.

### **3 Equipment yet to be sold**

As noted in paragraph 17 of the NPRM, the NWS Report and Order required equipment manufacturers to integrate the severe weather-related EAS event codes into equipment yet to be manufactured or sold, and suggests doing the same for the BLU event code. A strict interpretation would require that Sage reprogram equipment in its distribution channels that had yet to be sold to end users. We suggest that the FCC clarify in its R&O that the “yet to be manufactured and sold” clause is not a requirement for any equipment that is shipped with the ability for the user to add the new code as part of the installation procedure.

### **4 CAP versus legacy EAS distribution**

Paragraph 9 of the NPRM asks if there is any negative impact to Blue Alerts “...depending on whether they receive the alert through IPAWS or through the broadcast-based daisy chain.” A Blue Alert, when distributed through IPAWS with the intent to be distributed to EAS, would need to follow the same rules as any other CAP alert that is directed toward EAS. This includes the ability to send additional non-EAS rich media as well as tagging a particular audio file for broadcast use in the EAS message.

The FCC notes that legacy EAS messages do not have access to all of the rich media from the CAP message. This legacy versus CAP issue applies to all CAP/EAS alerts, and

is not unique to Blue Alerts. Sage devices, for example, currently accept the first version of an alert to arrive, legacy or CAP.

As Sage previously stated in 2016<sup>1</sup>, the FCC, or a stakeholder technical committee, should recommend a best practice for searching for a CAP alert that matches a legacy EAS alert when the legacy alert arrives first. We also noted that rules modifications may be required to allow for delays required to poll for a CAP version of an in-hand legacy alert, or in waiting for one-way distribution links to deliver a CAP message. Sage again asks for FCC to adjust the rules and set guidelines, as required, to permit a better coexistence of CAP and legacy EAS versions of the same alert.

Respectfully Submitted,

/s/

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President,  
Sage Alerting Systems, Inc.

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<sup>1</sup> Comments of Sage Alerting Systems, Inc. in regards to Emergency Alert System NPRM, at Page 8. PS 15-94, Filed June 8, 2016