Before the

**FEDERAL COMMUNICATIONS COMMISSION**

**Washington, DC 20554**

**Notice of Proposed Rulemaking )**

**)**

**Emergency Alert System ) FCC 17-74**

**)**

**Proposed Rule Changes to CFR-47, Part 11.31 ) PSHSB Docket No 15-94**

**)**

**Addition of New Alert Code, “Blue Alert” )**

**)**

**To: The Commission )**

**Comments of the Washington State SECC**

The Washington State Emergency Communications Committee (SECC) believes an Emergency Alert System “BLU” Alert Code is unneeded and would have a negative effect on EAS where it is adopted.

1. Law enforcement nationwide currently has a fast and effective communication system to alert affected agencies that someone who has attacked police officers or who is believed to be planning an attack is present in or is on the way to a given jurisdiction. Police departments also have means to separately inform other public agencies, as they deem appropriate.
2. The existing “LEW” Alert Code (Law Enforcement Warning) is well-suited to the proposed purpose and signals high urgency. It can be used to warn the public about someone who has attacked or plans to attack police, and to advise citizens to “report sighting but do not approach” a subject individual.
3. The public is not well-informed about existing EAS Alert Codes and what they mean. Adding a new Alert Code (“BLU”) would increase citizen confusion where it is implemented.
4. Although a new EAS Alert Code would pose minimal expense, software changes require broadcasters to update their EAS equipment and verify that it continues to operate properly. Updating computer-driven devices is subject to bugs and configuration errors. This process poses a burden on already-struggling broadcasters, especially radio stations, and particularly in situations where EAS sending and receiving equipment is operated at remote locations.
5. Washington State has methods separate from EAS to quickly inform citizens and the news media of urgent situations regarding public and police officer safety, including variable-message highway signs, highway advisory radio messages, established channels to inform the electronic media, and a computerized law-enforcement notification system to which citizens and the news media can and do subscribe.

Respectfully submitted:

**Clay Freinwald**

Clay Freinwald

Chairman

Washington State SECC

32521 107th Ave S.E.

Auburn, Wa. 98092

206-947-6115