In reference to 47 CFR Part 11, (PS) Docket Nos. 15-94, 15-91, FCC 18-91 Emergency Alert System, Wireless Emergency Alerts, I am providing these comments for your review and consideration:

The FCC should adopt and require reporting false alerts, provided there is a clear definition of what constitutes a false alert. Without a clear definition the reporting system will be flawed. Take for examples:

* If the National Weather Service determines atmospheric conditions are conducive for creating a tornado. For obvious safety reasons, the NWS disseminated an emergency alert. If there’s no tornado event, does the warning qualify for a false alert?
* Live-code testing is another mine field where a live-code test could be misconstrued as a real-world event. If the live-code test generates confusion among members of the public, will that constitute a false alert?

The FCC’ should adopt a mechanism by which anyone can report a false alert. However, that mechanism should be separate from the FCC’s Alert Reporting System (ARS). ARS will contain a wealth of critical and sensitive information which probably should be isolated from public access.

State EAS plans should not be required to include procedures for help preventing false alerts. The responsibilities of ensuring the alert is not false and taking corrective actions if a false alert is disseminated should be with the message originator. Take for example, what if an errant message is disseminated from a national command authority, should state-level officials be responsible because the message entered the state’s network? My recommendation is to recommend all authorized message originators have internal procedures to safeguard against the possibility of a false alert submission and for prompt corrective actions should a message be transmitted by error.

Lastly, I recommend the FCC explore the possibility for creating an event code that identifies the cancellation of a previously-transmitted emergency alert message.