

Responses to FCC EAS R&O 18-39-A1

Re: On-line State EAS Plan Template

11/30/2018

By Rodney V. Zeigler

Chairman, Nebraska State Emergency Communications Committee

Executive Director, National Emergency Broadcast Association

Page 51 (Top) SECC Governance Structure

I would suggest that the "Title" box not be a pre-populated drop down, but entered manually. Various SECC's use different titles and allowing the SECC's to populate this with their individual titles seems to relieve the FCC of trying to determine what is needed.

Page 53 Header Codes

Considering the number of header codes available, and used, I believe it would be simpler to list those codes that the individual State EAS Plans require participants to program into their EAS equipment.

Page 54 Monitoring Assignments-Presidential Alert

I strongly request that all references to National Primary monitoring assignments be deleted. The stations in the Primary Entry Point (PEP) system have specially programmed EAS devices that override all other EAS devices in that PEP stations audio chain. They are also locked onto only those monitoring assignments which are approved and supplied by the Federal Emergency Management Agency's (FEMA) Integrated Public Alert and Warning System (IPAWS) program. The PEP program is not within the purview of State Emergency Communications Committees (SECC) and is used solely as a monitoring assignment. This system is tested on a weekly basis by FEMA to assure operational readiness.

Page 56 (Bottom) Alerting Procedures

I suggest leaving the National Weather Service (NWS) out of this particular response. NWS is a Federal agency and their alerting procedures are outside the purview of the SECC's. Should there ever be questions, they should be directed to the appropriate personnel at NWS.

Overall

I would suggest that the individual State Plans be written in such a way that they can be publicly accessible. Those States that have information within their plans that they consider to be confidential should be allowed to submit a confidential addendum with this information, if it is not included within the template. I would further suggest that all information gathered in a State template be considered confidential and available only to those listed on Page 51 (Top) and the FCC.