

# SAGE ALERTING SYSTEMS

September 26, 2014

Via Electronic Filing

Marlene Dortch, Esq.  
Secretary  
Federal Communications Commission  
445 12th Street S.W.  
Washington, D.C. 20554

RE: Notice of Ex Parte Communication, EB Docket No. 04-296 (Review of the Emergency Alert System)

Dear Ms. Dortch:

On September 26, 2014, Sage Alerting Systems participated in a telephone conference with staff members of the Public Safety and Homeland Security Bureau. Present were Harold Price, President, Sage Alerting Systems; and Greg Cooke and James Wiley from the bureau. We discussed issues raised in the FCC 14-93 NPRM:

1. Sage was asked for comments on the implementation time to support the new all of US location code (000000) in time for an end of 2015 FEMA test using the NPT event code. This will require a) development, test, and deployments of new software, b) installation by end users, and c) purchase of new hardware by a small percentage of users to replace old legacy hardware that will not be updated to conform to the new standard. If the NPT code is limited to its current use as a normal EAS event, and is not redefined to function as a EAN, an update is feasible, in Sage's opinion, in less than a year. Sage suggests specifying nine months, the same length of time used by the FCC in its final extension of the original CAP rules.
2. We discussed accessibility rules. Sage believes that specific rules on text size, color, presentation speed, etc., are counterproductive and hard to implement, given the many different pieces of equipment that are used to display text to the end user. The NPRM presented a small set of rules, but they could be further simplified to: "If the message is a video crawl, or other text presentation format, it shall be displayed so that the message can be easily read and understood by viewers." We also suggest adding "The complete message must be displayed at least once, even if the audio portion of the message is shorter than the time needed to display the text".

Sage believes it is important that FCC inspections, as well as voluntary inspections, include a viewing of the video presentation of alerts so that corrections in understandability can be made.

We noted that Sage hardware plays almost no role in the presentation formats. In most modern cases, the Sage hardware presents the text of the message to downstream equipment, where it is formatted for display.

3. Sage discussed the difference between User Interface wildcards, and a device ignoring EAS protocol fields. Wildcards, as a method of simplifying the user's configuration task, should not be accidentally disallowed by coupling the term "wildcard" to the existing Part 11 requirement for a device to process all elements of the EAS protocol, as was done in para 54 of the NPRM.
4. Sage reiterated its comment to the NPRM on the manner in which the new 000000 location code is defined. In the proposed change to 11.31(f), a new state code is defined with "00". Sage believes this is the wrong approach, as it would allow the use of different P and CCC codes with an SS of 00. For example, someone might try to send an alert to "500000" meaning Central US. As there is no definition of which states are included in Central US, such a use will lead to confusion. Although our original suggestion in our comments to the NPRM are still valid, we now further recommend that a state code of 00 not be defined, and instead, a line be added to 11.31(f) stating 'A special PSSCCC code of all zeros (000000) is defined and shall be interpreted as "all of the United States", and its presence in the message shall cause any receiving device to accept that message as a match for its location"'.
5. We discussed those elements of the June 2014 report of the CSRIC National Testing and Operational Issues Task Group that were included in the docket by foot note 9 of the NPRM, but have not yet been addressed by the FCC. Sage agrees that these items may not fit within the time frame for making the 000000 change to support the FEMA national test, but we submit that they are important for proper processing of future EANs, and might require additional software changes by EAS vendors to address them.
6. Finally, we discussed the need for coordination on the upcoming national NPT among the various stakeholders, and the importance of using legacy EAS (not CAP) when using the NPT as a stand-in for EAN dissemination testing.

Respectfully submitted,

/s/

Harold Price  
President  
Sage Alerting Systems, Inc.

cc (via email) Greg Cooke  
James Wiley