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VIA ELECTRONIC SUBMISSION

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

Re: Notice of Ex Parte Statement—Review of the Emergency Alert System, EB Docket No. 04-296

Dear Ms. Dortch:

On October 1, 2014, AT&T filed a letter stating that it would submit for the record in this proceeding, a description of its review and testing process when new functionality is introduced into its IPTV system.

AT&T's Approval for Use (AFU) process is the formal authorization for network hardware/software deployed in the AT&T Network, and used to support AT&T services such as U-Verse TV. The AFU process involves, among other things, technical and system requirements development/analysis, process/M&P development, and lab/field testing all of which culminates in a Product Approval Notice (PAN).

In regards to the EAS changes proposed by the FCC in the Notice of Proposed Rulemaking (NPRM), AT&T would need to follow the AFU process to develop, test, and deploy any required firmware/software changes. The entire AFU process, including deployment of the firmware/software to the field, would take a minimum of 12 months, possibly longer, depending on the final requirements issued by the Commission & FEMA.

Based on previous experiences, AT&T's timeline is based on a minimum 6 month development/test cycle that typically requires additional development from our EAS vendor. The additional development is required because AT&T's EAS vendor first develops software code for its larger client base (Cable TV providers & Broadcasters) and then adapts this code for AT&T's IP-based U-Verse TV product. AT&T's experience has been that due to this development path, AT&T and its vendor must work closely to test and properly develop the appropriate firmware/software code through various iterations of the development/test cycle.

Once the firmware/software code is stable, and AT&T Labs has verified that it performs as expected (features & functionality), it is then introduced into an end-to-end labs network environment. The firmware/software code is then tested in the end-to-end labs network environment to ensure that there are no security impacts and/or network impacts that could adversely affect the U-Verse TV network. During this process, if any security and/or network impacts are found, routing flows and security configurations are updated and documented to ensure that the appropriate configuration is deployed out to the field. Finally, once all of the network and security impacts have been identified and the appropriate configuration applied in the end-to-end lab network environment, AT&T works with

human testers (Human Factors) to ensure that any changes to the platform do not adversely affect the customer experience. Testers rate the software/firmware updates based on various factors including, but not limited to, video/sound quality, accessibility, and overall user experience.

Thus, as stated previously, the typical development/test cycle for EAS updates is averaging 6 months. On top of the 6 month development/test cycle, it takes another 3 months for all of the business processes to play out in order to operationalize implementation, including M&P development. Once the development/test cycle and business processes are completed, AT&T estimates that deployment to the field would take another 3 months. This includes a First Field Application (FFA) and "soak" period of approximately 10 business days to ensure that all systems are configured properly in the field and that the updates are performing as expected. During the FFA/soak period, AT&T would send EAS test messages to a handful of U-Verse TV subscribers in the market area to verify performance of the network with the changes applied. Once the FFA is considered a success, then a methodical deployment to the remaining market areas would begin.

Additionally, allocating additional capital funding or headcount to the project would not in any way shorten the development/testing/deployment cycle due to the fact that there are sufficiently staffed dedicated teams assigned to each one of the processes outlined above. These teams are highly efficient and well qualified to handle their part of the process expeditiously. However, delays in the process are typically due to required code fixes found during various parts of the testing/deployment cycle. If at any point in this AFU process a defect is found in the vendor's software/firmware code, AT&T must formally document and report the error to the vendor. Each error found typically requires additional code development and the test/deployment process must begin anew.

Therefore, to summarize, based on the NPRM, the information that is readily available today regarding the NPT code, and previous EAS updates, AT&T estimates that it would take a minimum of 12 months to implement the requested changes outlined in the NPRM so long as the NPT code is transmitted as a "normal" EAS alert and not an EAN.

Respectfully Submitted,

James K. Smith

cc: James Wiley