How did we get to this place in the evolution of EAS since it was launched in January of 1997 where the means that EAS Participants use to comply with Part 11 do not all work the same way and there is still confusion about how they deal with the core last ditch national warning mission, the EAN?

Now that we know this is a key EAS issue, how do we fix it? The “Rosetta Stone” and “Bible” for EAS Participants (EP’s) vendors, FEMA and the National Weather Service has to be 47 CFR Part 11. This document not only sets out what EAS devices are supposed to do, but how they do it, and what EP’s have to do for their compliance.

The Partnership for Public Warning's (PPW) intent when we came up with the Common Alerting Protocol (CAP) was that CAP had to be an open, non-proprietary international standard to initiate warnings across different warning modalities, including EAS. Had we been able to keep the PPW going we might have been able to also make the point that our philosophy of CAP commonality and non-proprietary code must be extended to hardware and origination software design features and protocols peculiar to different warning systems. ALL those features should conform to ALL the requirements outlined in Part 11. Further, EAS-related hardware and software that implements CAP for public warnings must be lab certified by an independent entity as compliant and capable of “playing nice” with other links in the EAS chain all the way to the public.

I suggest that existing the vendor stakeholder entity (ECIG) and the FCC work out box differences sooner rather than later. I am sure that FEMA’s JITC, its Joint Interoperability Test Command, would be happy to help. The best experience and equipment to do EAS conformance testing most definitely resides there.

EAS has brought into being for-profit businesses that offer turnkey warning implementation and delivery services. Without me saying if I think this is right or wrong, I want to pose a question: Should such businesses be subject to some type of oversight and regulation when governments use them to deliver warnings? I know the R word will raise some hackles, but if EBS and SAME taught us anything, proprietary warning solutions do not always work well with other proprietary warning solutions.

The FCC should consider further clarifying Part 11 technical specifications so vendors interpret them exactly the same way. This may mean adding clearer statements that as far as basic handling of the EAN and possibly other core EAS codes is concerned, all boxes must do this the exact same way. Putting this in writing may be the easy part. Actually making it happen most certainly will not be an easy, painless, free, or overnight process.

Legacy EAS must have a sunset date. All the work to implement CAP is wasted when the public at risk gets their life safety warnings through a strainer that unfortunately may only give them EAS legacy “canned” crawls and messages.

The day when broadcast engineers were the key people who managed and cared about broadcast public warnings must end. We must bind Local and state EAS committees tightly to local and state emergency management, and bring in the management for all content whose streams are interrupted for emergency messaging, not just providers for on-air, cable or satellite.

Until the entire emergency management community realizes that warnings are a core response resource to be managed at the start of emergencies just like first responders, fire trucks, and emergency supplies, all the broadcast engineers in the world cannot fix what is wrong. A new dedication in the form of dollars from government for planning, training and implementation of warnings as a response tool has to happen too. Maybe we even need to have some government financial support to help correct EAS problems that have been and will be identified?

Until the day comes when we solve EAS hardware, legacy and operational issues (and realistically that day may be delayed a long time or never come) we most certainly need to recognize and clearly document differences and deficiencies that exist in EAS hardware, software and practices, and bring in all parties who are stakeholders. Short term, we need to prepare workarounds to make the best of all the problems we have identified, and those we may yet need to identify.

We also need a successor to the public-private non-profit effort that was the Partnership for Public Warning, Inc. Federal Advisory Groups (FACA's) like CSRIC are of course needed, but have rules and restrictions that PPW did not have and that a successor group must avoid. As PPW learned over a decade ago, such an entity must act as much as possible as a non-partisan stakeholder effort dedicated to help the government and the private sector save more lives and property through timely and effective public warnings of all types.